

- ✓ Environmental impact assessments and approvals: REFs, MW REFs, PEAs
- ✓ Ecological, Aboriginal and historic heritage assessments
- ✓ Biodiversity assessment method (BAM) assessments (BDAR) and offsetting (BSSAR)
- ✓ Commercial external landscape architecture designs for built or natural environments
- ✓ Expert witness reports and compliance audits
- ✓ Plans of Management (vegetation, biodiversity, cultural heritage, construction environmental)
- ✓ Aboriginal community engagement
- ✓ Stakeholder and community engagement
- ✓ Peer review / project briefs / budgeting assistance



Independent Environmental Audit Iberdrola Australia: Bodangora Wind Farm

Dubbo Regional Council LGA, Wellington NSW

March 2025



AREA acknowledges Traditional Owners of the country on which we work

Document controls

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AREA Person(s) Managing this Document	Addy Watson	
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V1.1	05/03/2025	Reviewed (PJC)
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Executive Summary

AREA Environmental & Heritage Consultants Pty Ltd (AREA) was engaged by Iberdrola Australia Limited (formally Infigen) to undertake the 2025 Independent Environmental Audit (IEA) for Bodangora Wind Farm Project, Project Approval MP 10_0157 (the Project).

Bodangora Wind Farm (BWF) is located approximately 15 km east of Wellington in Central West New South Wales (NSW) in the Dubbo Regional Local Government Area (LGA). The 113.2 megawatt (MW) wind farm has been operating since 2018 and comprises 33 General Electric 3.43-130 wind turbines.

This audit was conducted to address Condition D11 of Schedule D of the Approval, covering the three years of operation following the 2022 audit. The audit considers all Conditions of Consent (CoCs) for Project (however it is primarily an assessment of compliance with all conditions of consent applicable to the phase of the development that is being audited, i.e. operation) and is consistent with NSW Department of Planning, Housing and Infrastructure (DPHI) Requirement 2 Independent Audit Post Approval Requirements May 2020.

This environmental audit was conducted by AREA, led by Managing Director Philip Cameron and Senior Environmental Consultant Genevive Peel. AREA was approved and deemed as having the necessary skills and qualifications to undertake the audit by the NSW DPHI on 19 January 2025.

The IEA methodology incorporated the following:

- Discussions with BWF and its representatives to organise the audit, including the provision of documentation, the site visit and timing;
- Review of documentation provided by BWF and its representatives and preparation of compliance assessment checklists including a list of conditions of key regulatory approvals to be assessed for compliance;
- Consultation with relevant government agencies regarding any concerns or areas of particular focus during the audit;
- Site inspection including site meeting with key site personnel and review of documentation and interviews with key site and auditing personnel in February 2025;
- Consultation with key agencies, the Projects Community Consultative Committee (CCC) and / or other stakeholders as presented in this report;
- Review of additional documentation provided by other relevant parties;
- Assessment of environmental management performance through review of the implementation of key environmental management strategies, plans and programs; noncompliance's documented in annual reporting; regulatory actions; incidents; and complaints;
- Submission of a draft audit report to BWF to provide an opportunity for additional information and / or correction of fact
- Review of previous audits (conducted by J2M Systems in July 2018 and AREA in February 2022) to confirm resolution of non-compliances, noting the Project during the 2018 audit was in a construction phase (managed under a Construction Environmental Management Plan) and since October 2018 is in an operation phase (managed under an Operational Environmental Management Plan).
- Finalisation of the report.

AREA also conducted BWF's 2022 environmental audit. While some results in this report may appear identical to those from 2022, all items have been reassessed and in some cases the findings remain unchanged.

The Project is considered to be compliant with the Project Approval MP 10_0157 and the Environmental Protection Licence 20927. No Non-compliances were identified.

The BWF is committed to health, safety, and environmental protection. The Project has effective management, staff, multiple well organised policies, procedures, and systems in place to ensure compliance with all relevant conditions.

A detailed 'Independent Audit Table', outlining audit findings, comments, and recommendations, is provided in Appendix A.

The BWF project documentation and operations were found to be adequate, appropriately approved, and effectively implemented during the project's operation. Identified issues were few and minor, such as some documents being overdue for their annual review, as detailed in the audit report.

Consultation with the NSW Department of Climate Change, Energy, the Environment and Water – North West Conservation Programs, Heritage & Regulation Group (CPHR, formerly the Biodiversity Conservation Division (BCS)) revealed the department is concerned that the annual reporting within the BWF Bird and Bat Adaptive Management Plan (BBAMP) lacks sufficient analysis to fully satisfy the conditions of consent.

This audit found that BWF is compliant with all Bird and Bat Management Approval Conditions. However, it is recommended that BWF, in consultation with CPHR, review the BBAMP to ensure its future objectives align with the SMART framework (Specific, Measurable, Achievable, Relevant, and Time-bound).

Following three years of intensive monthly mortality detection and 'at risk' species monitoring, combined with five years of incidental carcass finds, the primary risks to birds and bats at BWF have been identified:

- Raptors, particularly Wedge-tailed Eagles, remain a key concern.
- Bats continue to be at risk.

Additional recommendations regarding the BBAMP are detailed in the audit report.

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1 Introduction

1.1 Background

AREA Environmental & Heritage Consultants Pty Ltd (AREA) were engaged by Bodangora Wind Farm (BWF) on behalf of Iberdrola Australia Limited (formally Infigen) to undertake an Independent Environmental Audit (IEA) for Bodangora Wind Farm Project, Project Approval MP 10_0157 (the Project). The Project was originally approved on 30/08/2013 and has been modified four times since, with Mod 4 approved in December 2017. This audit was conducted to address Condition D11 of Schedule D of the Conditions of Consent (CoC).

Bodangora Wind Farm (BWF) is located in the Dubbo Regional LGA approximately 15 km east of Wellington New South Wales in the area originally inhabited by the Wiradjuri people, Figure 1-1.

Figure 1-1: Location map (Source: BBAMP)



The 113.2 MW wind farm has been operating since 2018 and comprises 33 General Electric 3.43-130 wind turbines.

BWF was developed, constructed and continues to be operated by Iberdrola Australia. A Power Purchase Agreement for electricity and Large Generation certificates (LGCs) for 60% of Bodangora Wind Farm's electricity generation is in place with Energy Australia until 31 December 2030.

The engineering, procurement and construction (EPC) of the project was undertaken by the civil engineering construction Principal Contractor company CATCON, partnered with GE Renewable Energy (GE). GE continues as the contractors for the Operation and Management (O&M) of the BWF, in conjunction with Iberdrola.

The development of the project began in 2009. It received planning approval in August 2013, construction began in July 2017 and the wind farm began grid commissioning in October 2018. The BWF achieved practical completion and commenced commercial operation under the power purchase off-take agreement on 8 March 2019 and has continued to operate in this capacity up to the present.

1.2 Audit Team

This assessment was carried out by appropriately qualified and experienced ecologists (Table 1-1).

Table 1-1: Summary of AREA project team qualifications

Name	Position	CV Details	Role in this project
Phillip Cameron	Managing Director	<ul style="list-style-type: none"> BSc. Major in Biology. Macquarie University Ass Dip App Sci. University of Queensland Cert III Captive Animal Management Certified Environmental Practitioner (EIANZ) and practicing member NSW DPIE Biodiversity Assessment Method Assessor: accreditation number BAAS17082 NSW OEH Scientific License: 101087 NSW DPI Ethics Approval 17/459 (3) Practicing member of the NSW Ecological Consulting Association Former president of the NSW Malleefowl Recovery Group 	Lead auditor Report editing
Addy Watson	Manager Biodiversity	<ul style="list-style-type: none"> Grad. Dip. Captive Vertebrate Management, Charles Sturt University Grad. Cert. Social Impact, University of NSW B. Env. Sc. University of New England. NSW DPIE Biodiversity Assessment Method Assessor: accreditation number BAAS19066 Diploma Project Management 	Project manager
Genevieve Peel	Senior Ecologist	<ul style="list-style-type: none"> Bachelor of Science, Environmental (Hons) UNSW Cert III Captive Animal Management Cert IV Veterinary Nursing 	Auditing Team Leader, site visitor and Report writer
Dr Heidi Kolkert	Principal Ecologist	<ul style="list-style-type: none"> PhD (Science) University of New England BSc. (Hons) and Bachelor of Arts University of Tasmania Practicing member of the NSW Ecological Consulting Association 	Bird and Bat Management Plan advice
Mel Hancock	Administrator	<ul style="list-style-type: none"> Justice of the Peace and is currently has undertaken training as an Audit Team Leader in WHS, Environment and Quality including integrated management systems with Global-Mark (certification pending). 	Auditor and site visitor

1.3 Declarations

Declarations of Independence and the Independent Audit Report Declaration Form are included as Appendix E.

1.4 Audit Objectives

In accordance with Condition 8 of Schedule D of the conditions of consent (CoCs) the objectives of this IEA were to:

1. assess whether the project complies with the relevant requirements in the approval and any strategy, plan or program required under this approval; and

2. recommend appropriate measure or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under the approval.

1.5 Audit scope

The audit considers all CoC for Project Approval MP 10_0157 and is consistent with NSW DPHI Requirement 2 Independent Audit Post Approval Requirements May 2020, hereafter 'IAPARs 2020'.

1.6 Audit period

The 2022 audit covered commissioning of the Project and the three-year post construction period 2019-2021 managed under an Operational Environmental Management Plan (OEMP).

This audit covers the three years of operation since the 2022 audit, from the beginning of 2022 to the beginning of 2025 as per CoC D8.

2 Audit methodology

The processes for this IEA involved a review of documentation (plans, programs, statutory requirements), consultation with relevant parties as well as a site inspection and audit interviews with BWF site management team to determine the level of environmental performance and compliance with requirements.

2.1 Selection and endorsement of audit team

The environmental audit was conducted by AREA Environmental & Heritage Consultants (AREA), led by Managing Director, Phillip Cameron and Senior Ecologist, Genevieve Peel. AREA was approved and deemed as having the necessary skills and qualifications to undertake the audit by the NSW DPHI on 19 January 2025, see letter attached in Appendix D.

2.2 Independent Audit scope development

The processes for this IEA involved a review of documentation (plans, programs, statutory requirements) and consultation with relevant parties, as well as a site inspection and audit interviews with BWF site management team to determine the level of environmental performance and compliance with requirements.

AREA also consulted with the relevant government departments and other relevant stakeholders to obtain their input into the scope of the audit. Comments received during consultation are recorded in this report.

Specific environmental issues raised during consultation have been investigated. Steps undertaken and findings of the investigation are recorded in this report.

2.3 Compliance evaluation

This Independent Audit is based on verifiable (primary) evidence. Evidence has been collected using the following methods, as appropriate in the circumstances:

- physical review / sighting of relevant records, documents, plans, strategies and reports;
- face to face and phone / team interviews with relevant site personnel;
- photographs (including aerial imagery);
- GIS figures and associated shapefiles;
- onsite inspections of relevant locations, activities and processes.

All relevant and publicly available project documentation was downloaded for review. Discussions were held with the BWF Owners Representative regarding the currency of these documents and the availability of site records to demonstrate compliance. During the planning phase, relevant Government agencies and other stakeholders were consulted to identify any specific issues or information they believe should be considered as part of the audit.

When evaluating post-approval documents (such as Environmental Management Plans and Sub-plans), the auditor has considered whether:

- they have been developed in accordance with the conditions of consent and approvals applicable to the development and their content is adequate; and
- they have been implemented in accordance with the conditions of consent for the development.

The adequacy of documents has been determined based on whether:

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

The evidence used to verify the compliance status descriptor (see Section 3.7) chosen with respect to each condition is documented in an Independent Audit Table, along with any relevant observations and notes, including any opportunities for improvement, as they see fit in relation to any compliance requirement or any other aspect of the development.

The Independent Audit Table for this IEA is provided as Appendix A.

2.4 Site inspection

A site inspection (by foot and vehicle) to review key site-based activities was undertaken on Thursday 13 February by two AREA auditors Genevieve Peel and Mel Hancock.

2.5 Site interviews

The audit site interview took place on Thursday 13 February on site with the BWF Owners Representative, Michael Bullock, and two AREA auditors to discuss the objectives of the audit, the scope of the audit, the resources required and methodology to be applied. Vikas Mahajan – GE Owners Representative was also present and available for questioning at the time of inspection.

The site visit commenced with visitor sign-in (following online induction), tour of existing information platforms (posters and computer-based systems) relevant to the audit, then a meeting to discuss and clarify matters of compliance, review of records and site inspection.

A closing meeting was held with the BWF Owners Representative, Michael Bullock via phone on Thursday 6 March 2025 to present preliminary audit findings, recommendations and any post-audit actions required.

2.6 Consultation

Part of the audit requires consultation with a range of stakeholders and AREA's consultation focussed on stakeholders relevant to Environmental Assessment or Conditions of Consent.

The following stakeholders were contacted:

- NSW Department of Planning, Housing and Infrastructure - Compliance Department
- NSW Department of Climate Change, Energy, the Environment and Water - North West Conservation Programs, Heritage & Regulation Group (formally Biodiversity Conservation Division (BCS))
- NSW Department of Primary Industries and Regional Development (formally DPI)
- NSW Department of Planning, Housing and Infrastructure – Crown Lands
- NSW Environment Protection Authority (EPA)

- Chairperson of the Community Consultative Committee (CCC) and
- Dubbo Regional Council.

Results of consultation have been included in the relevant parts of this audit.

2.7 Compliance status descriptions

As per the IAPARs 2020, the compliance status of each requirement in the Audit Table must be determined using the relevant descriptors in Table 2-1 below, having regard to their meanings. No other terms may be used to describe the compliance status.

Table 2-1: Compliance status descriptions

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.

The terms partial compliance, partial non-compliance, not verified or administrative non-compliance or other similar terms are not used.

As part of the audit evaluation, the auditor may make observations, including identifying opportunities for improvement related to compliance requirements or other aspects of the project. These observations are supplementary to the compliance status descriptor assigned to each requirement which are limited to the descriptors outlined in Table 2-1.

3 Audit findings

3.1 Approval and document list

This audit considers all conditions of consent (CoCs) for Project Approval MP 10_0157.

Relevant documentation obtained during the planning phase was reviewed and a compliance checklist was established before the audit site inspection.

The Construction Environmental Management Plan (CEMP) was replaced by the Operational Environmental Management Plan (OEMP) on 16 December 2018 which is administered by Iberdrola.

The following documents were reviewed and considered during this audit:

1. Environmental Protection Licence (EPL) 20927
2. Bird and Bat Adaptive Management Plan
3. Design & Landscape Plan
4. Decommissioning & Rehabilitation Plan
5. Operational Environmental Management Plan
 - Operation Soil and Water Management Plan
 - Flora and Fauna Management Sub Plan
 - Heritage Management Sub Plan
 - Bushfire Risk Management Sub Plan
 - Noise Management Plan
 - Waste Management and Re-use Sub Plan
 - Fuel and Oil Management Sub-Plan
 - Greenhouse and Energy Management Strategy
 - Air Quality Management Strategy
 - Design and Landscape Sub Plan
6. Pollution Incident Response Plan
7. Bushfire Management Plan
8. Compliance Tracking Program
9. GE Environmental Management Plan
10. GE Emergency Response Plan
11. GE Simplified Work Plan
12. Biodiversity Offset Package.

Additional specialist reports, correspondence and approval letters were requested and reviewed where relevant.

3.2 Compliance performance

The Project is considered to have achieved compliance with the Project Approval MP 10_0157 and the Environmental Protection Licence 20927.

No Non-compliances were identified.

The BWF has an effective management structure and team who are committed to safety, environment, and rehabilitation. It has multiple well organised policies, procedures, and systems in place to ensure compliance with all relevant conditions.

3.3 Summary of agency notices, orders, penalty notices or prosecutions

No agency notices, orders, penalty notices or prosecutions have been issued during the audit period.

3.4 Audit Non-compliances

No Non-compliances were identified.

3.5 EPL Non-compliance

In the past, two non-compliances (NC) have been recorded against the BWF Environmental protection Licence (EPL) 20927.

- 1) One on 10/08/2018 has already been reported in the 2018 audit related to erosion and sediment control has been actioned and resolved.
- 2) Another on 02/04/2019 was recorded as follows: *Wind direction and speed are to be measured at a height of 10m. Actual measurements are being taken at 20m. This was due to the incorrect specification of the metmast instrumentation. Discussing with EPA if existing configuration can remain. EPA has written to licensee regarding non-compliance and relevant action.* This NC has also been resolved.

No further NC's against the EPL have been recorded in the audit period.

3.6 Previous audit recommendations

A previous construction IEA conducted by J2M Systems in July 2018 under the CEMP identified wide-ranging compliance for the majority of the conditions of Project Approval with records requested readily available, legible and complete. The 2018 audit identified four (4) non-compliances across seven (7) conditions of the project approval and a further six (6) Opportunities for Improvement were identified across seven conditions of the project approval. The 2022 audit by AREA Environmental & Heritage Consultants (AREA) determined compliance issues highlighted by the 2018 audit are now either considered compliant or are no longer relevant as the project has moved from construction to operation phase.

The 2022 audit undertaken by AREA identified only one Non-compliance for Condition F9. A further nine recommendations were made. The 2022 findings, and their current status are outlined in Table 3-1 below.

Table 3-1: 2022 IEA recommendations

Relevant Condition of Consent	2022 Recommendation	Current status 2025
Condition B7	The Decommissioning and Rehabilitation Plan (DRP) is scheduled to be updated in May 2022 and needs to include Modification 4.	Following consultation with the Planning Department, BWF was informed that, as per Modification 4, there is no requirement to update and post this plan, as such it has been removed from the website and has not been updated. AREA has sighted this correspondence.
Condition B9	EPL (01/02/2019) on BWF website needs to be updated to most recent version (4/11/2020)	Most recent license is currently available online, however previous version (01/02/2019) is also there and should be removed.
Condition C6(b)	Monthly monitoring report May 2021 not evidenced. The addition of this report would total 24 months (2 years) of monitoring.	The monthly monitoring report for May 2021 was provided to the auditor. The number of monthly reports now totals 24 months as required by the BBAMP.
Condition C7	The Biodiversity Offset Package needs additional information demonstrating how offset obligations have been met through payment into the BCT.	The Biodiversity Offset Package has been updated with additional information demonstrating how offset obligations have been met through payment into the BCT. This document is available on the BWF website.
Condition D4	Some documents on the Project website need updating to current versions, dates inserted (since the project shifted from construction to operation), or are overdue for an annual review: <ul style="list-style-type: none"> EPL license needs most recent version online Compliance Tracking Program needs updating regarding relevant dates and timing as the project has moved from construction to operation since the program was developed. Also, the reference to the CEMP should be replaced with the OEMP. Pollution Incident Response Management Plan overdue for annual review OEMP overdue for annual review. Biodiversity Offset Package needs additional information demonstrating how offset obligations have been met through payment into the BCT.	These documents have been updated since the 2022 audit, however some documents online are again overdue for their annual review. BWF reports these documents are currently going through the internal review process.
Condition D5	The Compliance Tracking Program Document needs updating in regard to relevant dates and timing updated as well as change the reference to the superseded CEMP to current OEMP.	This document has been updated since the 2022 audit, however the version online is again overdue for their annual review. BWF reports this document is currently going through the internal review process.
Condition D9	As per the letter from the Secretary dated 31/8/2018, the 2018 IEA and IEA action plan should be uploaded to the company website.	These documents are currently available on the BWF website.
Condition F5	Non-Compliant Consultation with the CL&W and DPI (Fisheries) within six months of the cessation of construction activities at the relevant area did not occur. The proponent was recommended to contact CL&W and DPI (Fisheries) regarding this	Consultation with the compliance department resulted in the following correspondence (available on the BWF website): <i>The 1 (one) non-compliance identified in the IEA in relation to Condition F5, i.e a lack of consultation with relevant agencies, has been assessed in accordance with the Department's</i>

Relevant Condition of Consent	2022 Recommendation	Current status 2025
	Condition and provide a copy of the Niche Revegetation Monitoring Report.	<i>Compliance Policy and on this occasion, determining to record the breach with no further enforcement action.</i> The relevant agencies have since been consulted with, see Appendix A, Condition F5, and this matter is considered closed.
Condition F10	Have the results (of noise monitoring within 3 months of commissioning) been provided to DPE within one calendar month of completion of the monitoring and assessment report? If this has been done the OEMP needs to be updated accordingly. If it has not been done the results need to be submitted to DPE.	AREA has sighted correspondence regarding submission and confirmed compliance of post construction noise monitoring report to the department in May 2022. OEMP has been updated accordingly and is available on the BWF website.
Condition F19	As per the OEMP Approval letter it is unclear if: <i>further works are required to determine specific sector management measures that will be used by Bodangora to ensure noise criteria are not exceeded.</i> This needs to be clarified and the OEMP updated accordingly if required. The OEMP is overdue for annual review and needs to be updated as required.	OEMP has been updated accordingly and it, as well as the Department approval letter, is available on the BWF website.

3.7 EMP, Sub-plans and compliance documents adequacy

An assessment of the general adequacy and compliance against Project Approval conditions of key management plans was undertaken and is provided in Appendix A. It should be noted that AREA did not undertake a detailed or technical review of these management plans.

Overall, the Operational Environmental Management Plan (OEMP), sub-plans and compliance were found to be adequate, have been provided by appropriately qualified and experienced personnel, received the appropriate approval and have been satisfactorily actioned during operation of the BWF.

Some documents are overdue for an annual review, and all should be checked closely for minor typographical, formatting and timing errors:

- Compliance Tracking Program overdue for annual review
- Pollution Incident Response Management Plan overdue for annual review
- OEMP overdue for annual review.

Recommendations and opportunities for improvement are further discussed in Section 4.

3.8 Consultation outcomes

Consultation outcomes are as follows (see Appendix C for copy of emails). Any questions raised within the consultation period have been addressed during the audit and relevant findings will be reported back to consulted parties.

NSW Department of Planning, Housing and Infrastructure - Compliance Department

Planning provided the following in response:

The Audit needs to ensure it reviews all conditions of Bodangora Wind Farms consent MP10_0157 and addresses the requirements for the Independent Environmental Audit, outlined in Schedule D, Condition D8 and D9.

Addresses the following aspects:

- Ensure that any comments from agencies and/or stakeholders consulted have been adequately addressed in the report, consultation should include but not limited to Biodiversity Conservation Division (BCS), Community Consultative Committee (CCC) and Dubbo Regional Council;*
- Include a status update for any actions identified from any previous audits;*
- Provide a high-level assessment as to whether the Environmental Management Plans and sub-plans required by the consent / approval are adequate;*
- Include a review of the environmental performance of the development, including an assessment of actual and predicted impacts documents in the EIS;*
- Identify any additional environmental management improvement opportunities; and*
- Clearly identified key strengths of the development's environmental management and performance*

These points have been addressed by this audit. The Compliance Department also suggested the auditor consult with NSW Crown Lands regarding this IEA.

NSW Department of Planning, Housing and Infrastructure – Crown Lands

At the suggestion of the Compliance department, NSW Crown Lands was contacted by email on 13/02/2025 and 26/02/2025. A reply was received on 28/02/2025 reporting NSW Crown Lands note compliance with Condition F5 and do not have any comment to add at this time.

NSW Environment Protection Authority (EPA)

The NSW EPA was contacted by email on 05/20/2025 and 26/02/2025, an automatic reply acknowledging receipt of email was received but no formal reply.

BWF provided a letter from the EPA Regulatory Operation Regional Acting Unit Head regarding 'Environmental Risk Assessment Outcomes – EPL 20927 – Bodangora Wind Farm' dated 06/09/2023 was sighted which stated:

The EPA has conducted its 5-yearly review of the licensee's environmental risk assessment. The assessment considered impacts of the day-to-day activities at the premise on the environment (air, odour, water and noise) and the risk of a pollution incident. Based on the recent assessment, the overall regulatory priority for the premises remains at Low.

NSW Department of Primary Industries and Regional Development

NSW Department of Primary Industries and Regional Development was contacted by email on 04/02/2025 and the following reply was received by David Ward on 05/02/2025:

Thank you for providing me with the opportunity to provide comment from our department with respect to compliance with consent conditions for this project and the independent audit.

DPIRD Fisheries were consulted and asked to review the Bodangora Windfarm Revegetation Monitoring-Third Visit Report dated 18th March 2021 as per conditions F5 and F6 of the Development Consent to determine whether the department was satisfied with rehabilitation of areas of disturbance to watercourses and associated riparian vegetation and that revegetation measures had been undertaken consistent with these requirements.

DPIRD Fisheries reviewed the independent report and responded that our department was satisfied with the revegetation rehabilitation adjacent to mapped hydrolines and Key Fish Habitat and were satisfied with the rehabilitation of disturbances adjacent to waterway crossings. Our department was satisfied that a site inspection by DPIRD Fisheries was not warranted.

DPIRD Fisheries have no further requirements or concerns that need to be raised with regards this development and compliance with the development conditions.

Dubbo Regional Council

Dubbo Regional Council (DRC) was contacted by email on 04/02/2025 and 12/02/2025. A reply requesting more information was received on 12/02/2025 with additional information provided on 13/02/2025. A follow up email to DRC was sent on 26/02/2025 and a reply was received 04/03/2025. Councils' response is as follows (see also Appendix C).

Council email

The email has been forwarded to appropriate officers within Dubbo Regional Council, and the only issue raised related to:

- 1) 2022 Independent Audit Findings and Recommendations
 - a) The 2022 Audit often stated: This current audit relates to operation of the project, conditions related to Construction have not been fully explored as they are not relevant to this audit. For example, Condition C9 relates to waterway crossings, but this wasn't deemed relevant to the 2022 Audit? This is similar, with regard to Condition No's C12, 13, 14 & 15.
- 2) Planning Agreement
 - a) With regard to Condition B16, the contributions requirement is operating satisfactorily.
- 3) Biodiversity
 - a) Council notes that condition C1 limits clearing to 1.32 hectares, but that the Secretary amended this area to 3.0 hectares on 24/11/2017, it seems inconsistent that the consent hasn't been amended accordingly.
- 4) Bird and bat monitoring and management
 - a) Council notes a significant number of bird and bat strikes and is interested in the proponents response to mitigating this issue, in addition to the additional monitoring.
- 5) Design and Landscape Plan
 - a) Council raises concerns as to whether the Design and Landscape Plan has been implemented.

Audit response

In response to issues raised by council:

- 1) As per the *Independent Audit Post Approval Requirements May 2020*, page 8, an IEA includes an assessment of compliance with **all conditions of consent applicable to the phase of the development that is being audited**. The 2022 audit and this audit relate to operation of the project which is why conditions related to construction were not fully explored, particularly conditions that were to occur 'prior to the commencement of construction'. Regardless, all audits to date have considered all conditions of consent. Adequate consultation with DPI (Fisheries) has occurred, as evidenced by consultation with this department in the previous section. As per section 3.16 of this report, where this IEA indicates information has been provided to by third parties, AREA has made no independent verification of this information as it is beyond the scope of the audit.
- 2) No response required.
- 3) Condition C1 (a) states the proponent must ensure that no more than 1.32 hectares (ha) of native vegetation is cleared for the Project, **unless the Secretary agrees otherwise**. A letter from the nominee of the secretary dated 24/11/2017 is included in Appendix F which demonstrates the 'Secretary agrees otherwise':

'I understand that Infigen is seeking approval to allow as increase in clearing to around 3 hectares. The Department has agreed to Infigen's request to increase the clearing limit for the project'.

This is consistent with the Project Approval.
- 4) See Section 3.9 of this report re: audit findings and recommendations regarding the BWF BBAMP.
- 5) As per assessment of Condition C26 the Design and Landscaping Plan has been prepared and approved as per Project Approval and relevant parts of it have been implemented as discussed in Conditions C19, C20, C21, C24 and C25.

Community Consultative Committee (CCC)

The independent chairman, Ian Rogers, was contacted via email on 04/02/2025. He responded as follows:

I have chaired the Bodangora Wind Farm CCC since late 2015 and continue to do so. During that time Infigen Energy and now Iberdrola have both been highly effective in supporting the functioning of the CCC in accordance with the Community Consultative Committee Guidelines. I am familiar with the Community Consultative Committee Guidelines for State Significant Projects (November 2016; updated January 2019) and believe that the Bodangora Wind Farm CCC has been operating within those guidelines.

The NSW Department of Climate Change, Energy, the Environment and Water - North West Conservation Programs, Heritage & Regulation Group (CPHR, formally Biodiversity Conservation Division (BCS))

When consulted, CPHR expressed the following (see full response in Appendix C):

CPHR continues to engage with Bodangora Wind Farm in regards their Bird and Bat Management Plan (BBAMP). CPHR has been consistently disappointed with the lack of analysis in these reports. We have requested the reports provide a degree of analysis that may provide insights into the success of mitigation actions or environmental conditions that may influence blade strike or carcass detection.

Condition C6 specifies that the BBAMP “shall incorporate Monitoring, and a Decision Matrix that clearly sets out how the Proponent will respond to the outcomes of monitoring”. Condition C6 (d) states that the proponent must “identify ‘at risk’ bird and bat groups” while Condition C6 (f) states that the proponent must “identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the application of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success”. CPHR is concerned that the annual reporting is not providing sufficient analysis to satisfy these conditions.

We request that the audit include an assessment of the annual BBAMP reports and whether the appropriate approval conditions are being met.

This audit determined, as per Appendix A, the BBAMP continues to meet the CoC, however some observations and recommendations have been made, refer to the following section.

3.9 Bodangora Wind Farm Adaptive Management Plan (BBAMP)

The roll out of the Bodangora Wind Farm Bird and Bat Adaptive Management Plan (BBAMP) is discussed in the following section and compliance is addressed in Appendix A.

3.9.1 Background

The reporting of the Bodangora Wind Farm Adaptive Management Plan (BBAMP) has unfolded as follows:

- BBAMP approved in June 2017
- BWF farm began grid commissioning in October 2018.
- Mortality detection at BWF commenced June 2019.
- First annual report (Nature Advisory **August 2020**) was submitted following June 2019 to May 2020 mortality detection surveys.
- Second Annual report (Nature Advisory **September 2021**) was submitted following June 2020 to May 2021 mortality detection surveys.
- Third annual report (Nature Advisory **November 2022**) was submitted following incidental surveys by BWF staff June 2021 to May 2022.
- Fourth annual report (Nature Advisory **November 2023**) was submitted following incidental surveys by BWF staff June 2022 to December 2023 and mortality detection surveys January to June 2023.

- Fifth annual report¹ (Nature Advisory **November 2024**) was submitted following mortality detection surveys July to December 2023 and incidental surveys by BWF staff to May 2023.

Nature Advisory's concluding recommendations from the Fifth annual report are as follows:

- Bat mortality is ongoing at a relatively high rate and is of concern given the local viable population of bats is unknown and what the impact on this is.
- Continued Monitoring: Due to continuing mortality and significant inter-annual variation in mortality, regular bat-specific carcass searches and raptor monitoring should continue which will help in understanding long-term trends and the effectiveness of mitigation measures.
- Continued Flying-fox camp monitoring.
- Mitigation Measures:
 - Mitigation measures implemented during the monitoring period to be continued (removal of carrion, control of stock, pest management)
 - Consider implementing or enhancing mitigation measures such as adjusting turbine operation during high-risk periods for birds and bats, especially during migration seasons or peak activity times as mentioned in Supplementary Mitigation Measures.
- Further Research: Conduct detailed studies to understand the specific factors contributing to bat mortality, including behavioural studies and acoustic monitoring, to develop targeted mitigation strategies. This could also include deploying Songmeters and seasonal observation of roosting of flying foxes at Wellington Camp and prolific flowering of eucalypts on site if there is roosting and feeding activity, mitigation measures described in Section 6.2 could be implemented.
- Stakeholder Engagement: Engage with local wildlife conservation groups and stakeholders to share findings and collaborate on improving wildlife protection measures around wind farms.

The total mortality detections for the three years of intensive mortality detection surveys are summarised below, as well as the 'actual mortality estimates' based on modelling (by symbolix) following carcass scavenging and detection rate trials:

Table 3-2: Mortality detection results (including incidental finds)²

Year	Bird	Bat	Annual Total
1 (2019/2020)	47	41	88
2 (2020/2021)	141	344	485
3 (2023)	56	45	101
Species Total	244	430	674
Monte carlo simulations actual mortality estimate over 3 years	1441	5990	

¹ Not yet available on website as it is still being reviewed by the Department

² Exact numbers were difficult to collate due to the different ways these numbers have been presented throughout the annual reports, therefore there may be some inconsistency with other tallies. For example, some totals in the reports include incidental finds or pre survey finds, sometimes they do not; some include the LRFF and Nankeen kestrel events, some do not. Regardless, these numbers give an illustration of trends for the purposes of this audit.

The monitoring results, trigger events and other surveys or trials undertaken during each annual report period are summarised in Table 3-3³ below:

Table 3-3: Annual report summary

Reporting period	MORTALITY detection	Other surveys/trials (population monitoring)	Trigger events
First annual report (Nature Advisory August 2020)	<p>June 2019 to May 2020 12 x monthly mortality detection surveys plus incidental surveys by BWF staff</p> <p>A total of 41 bat strikes were recorded within the BWF site during its first-year monitoring period and an additional two bat strikes were recorded prior to the commencement of the first-year monitoring period.</p> <p>A total of 47 bird* strikes were recorded within the BWF site during its first-year monitoring period and an additional bird strike was recorded prior to the commencement of the first-year monitoring period.</p> <p>*Wedge-tailed Eagles = 5</p>	<ul style="list-style-type: none"> • Detectability trial July 2020 • Scavenger trial July 2020 • Grey-crowned Babblers – vulnerable BC Act; pre-construction survey July 2017 then monthly surveys of for the 12 month period August 2019 to July 2020 • Superb Parrot – vulnerable BC and EPBC Act; pre-construction survey 2017 /2018⁴ then monthly Incidental reporting of all Superb Parrot observed was conducted across the entirety of each field visit. • Incidental reporting of all raptors observed was conducted across the entirety of each field visit. • Incidental reporting of White-throated Needletail – vulnerable BC and EPBC Act observed was conducted across the entirety of each field visit. 	<ul style="list-style-type: none"> • One Black Falcon (Vulnerable) was found April 2019 by BWF staff • Three Grey-headed Flying Fox GHFF (– vulnerable BC and EPBC Act) carcasses were found by BWF staff April – July • One Yellow-bellied Sheathtail Bat (vulnerable under the BC Act) was found during formal searches on 16th April 2020
Second Annual Report (Nature Advisory September 2021)	<p>June 2020 to May 2021 12 x mortality detection surveys</p> <p>A total of 344 bat strikes were recorded within the BWF site during this period – mostly from flying-foxes (7 x grey-headed flying foxes – vulnerable BC and EPBC Act and 269 Little-red Flying Foxes LRFF)</p> <p>A total of 141 bird* strikes were recorded within the BWF site during this monitoring period.</p> <p>*Wedge-tailed Eagles = 8</p>	<ul style="list-style-type: none"> • Detectability trials July 2020 and March 2021 • Scavenger trial April 2021 • Grey-crowned Babblers – vulnerable BC Act; – ‘continued to be’ recorded December 2020 through to May 2021 • Superb Parrot – vulnerable BC and EPBC Act; – incidental observations Feb 2020 to April 2021 • Incidental reporting of all raptors observed was conducted across the entirety of each field visit. • Incidental reporting of White-throated Needletail – vulnerable BC and EPBC Act observed was conducted across the entirety of each field visit. One flock was observed in March 2021. 	<ul style="list-style-type: none"> • Non-threatened species trigger investigation for Nankeen Kestrel during May 2021 after a high number (45) of mortalities occurred during April and May 2021 (mouse plague) • One Yellow-bellied Sheathtail Bat (vulnerable under the BC Act) was found during formal searches on 6th March 2021 • Non threatened species impact trigger for LRFF in March 2021, a total of 299 mortalities detected, plus four GHFF

³ This summary has been roughly collated by the auditor to get an understanding of the BBAMP timeline and significant events, it is not an in-depth analysis of these events and reports

⁴ The results of the surveys are outlined in the report by Brett Lane and Associates 2018, Bodangora Wind Farm, targeted Superb Parrot survey, Report No. 15124 (6.3), May 2018 (BL&A 2018).

Reporting period	MORTALITY detection	Other surveys/trials (population monitoring)	Trigger events
		<ul style="list-style-type: none"> • LRFF monitoring and mitigation measure trials following non threatened species impact trigger (2 x separate reports) • A bat utilisation survey was undertaken 2021 which identified up to 17 bat species inhabiting the site. • Mortality estimates by Symbolix 	
Third annual report (Nature Advisory November 2022)	Covers 2021/2022 Two bats and no birds	<ul style="list-style-type: none"> • Bird and bat incidental carcass finds (BWF staff) • LRFF and GHFF observations, weekly to fortnightly by BWF staff • NOTE: BCS requested trigger point for WTE to be revised down to two carcasses per year, to be implemented in 2022/2023 monitoring, also complete another 12 months of carcass monitoring using scent detection dogs 	<ul style="list-style-type: none"> • One Yellow-bellied Sheathtail Bat (vulnerable BC Act) was found by BWF staff March 2022
Fourth annual report (Nature Advisory August 2023) Fifth annual report (Nature Advisory November 2024)	Jan 2023 to Dec 2023 12 x monthly mortality detection surveys plus incidental surveys by BWF staff with scent detection dog One incidental GHFF find by BWF staff 56 bird mortalities* 45 Bat mortalities *Wedge-tailed Eagles = 2 October and Nov 2023 – NOT reported as a trigger point	<ul style="list-style-type: none"> • LRFF and GHFF observations, weekly August to November 2021) to fortnightly (March – August 2022) by BWF staff then monthly from January 2023 • Mortality detection trials Sept and Nov 2023 • Incidental raptor monitoring • Mortality estimates by Symbolix# 	<ul style="list-style-type: none"> • One Grey-headed Flying Fox GHFF (vulnerable BC and EPBC Act) carcasses were found by BWF May 2023 • One Yellow-bellied Sheathtail Bat (vulnerable BC Act) was found during formal searches in March 2023 <p><i>Wedge-tailed Eagles = 2 October and Nov 2023 – NOT reported as a trigger point</i></p>

Simulation estimates for cumulative mortality over three years was estimated at 5,990 bats and 1,441 birds

3.9.2 Observations

The following observations of the BBAMP and its associated reports have been made:

- Annual reporting is not lining up with calendar year and it makes it hard to keep track of annual trends – especially for the 12 months of carcass monitoring using scent detection dogs from January to December 2023 which was reported over two annual reports. If annual reporting is not going to line up with annual monitoring events, it was recommended to seek approval to make them align.
- As per approval conditions, annual reports should be delivered within two months of completion of monitoring.
- The time delay between when a monitoring finishes, is then reported and then actioned means that long periods of time are going by without any meaningful data being collected, such as:
 - 18 months between the end of monthly carcass detection surveys in May 2021 and the recommencement of detection surveys in January 2023

- Carcass detection surveys were completed in December 2023 and reported in the Fifth annual report dated November 2024. Already more than 12 months have passed without any further planning in regard to future monitoring actions.
- Incidental finds by BWF staff have been steadily declining since 2021, see Table 3-4 below. BWF Owners Representative reports that ad hoc visits to each turbine occur less frequently once the initial start-up issues were resolved and the turbines operate relatively consistently. It was also surmised that the animals are ‘learning’ and there are less carcasses to find. Whilst no other formal surveys occur, unless routine carcass searches become a core, actionable and reportable duty of BWF staff, incidental finds may not be able to be relied upon as a measure of impact.

Table 3-4: BWF staff incidental finds

BWF Incidental finds	Number
2020	15
2021	71
2022	2
2023	1
2024	0

- In 2023 two Wedge-tailed eagles (WTE) mortalities were not reported as a trigger event. This is inconsistent with BCS instruction in 2022 revising down the trigger point for WTE to two carcasses per year. The Fifth annual report also states that ‘*WTE mortality to be documented photographically to ensure the age estimate can be recorded, and to be reported to BCS as soon as possible within 5 business days of species identification*’ – it is unclear if this occurred for the two WTE mortalities detected in 2023.
- All turbines were searched in the initial two years of survey. The correlation between WTE flight observations and the location of turbines searched for carcasses in 2023 is unclear. There is potential for undetected WTE carcasses to lie under unsearched turbines in 2023.
- WTE mortalities trends were incorrectly reported in fifth annual report as ‘*There was also a slight reduction trend in detected Wedge-tailed Eagle mortalities with 5 casualties observed in Year 1 followed by **3 casualties** and 2 casualties in Year 2 and Year 3 respectively*’. The correct numbers were - **8 casualties in Year 2**. Impact trends for WTE need to be re-assessed.
- It is unclear how many personnel from Nature Advisory are consistently present for onsite surveys (the reports state that the investigation was undertaken by a ‘team’ from Nature Advisory but does not specify the personnel or the role of each person) and how these influences ‘incidental monitoring’ results – i.e. the number of personnel on site may influence the number and accuracy of observations. A summary of staff and their roles in the investigation would be helpful.
- The fourth and fifth annual reports state that incidental raptor ‘*monitoring observations were taken opportunistically using binoculars while conducting carcass searches under turbines and while traversing the site*’. Similarly, it is unclear who and how many personnel are on site at a time – if there is only one person on site, how do they traverse the site, handle a scent detection dog, search for carcasses and look for raptors with binoculars at the same time? Are they suitably qualified and experienced to handle this multitasking? A clear identification of staff and their skills set and separation of duties is recommended to ensure survey results are accurate and can be relied upon.
- An executive summary for annual reports would assist with the readers’ ability to extract the most meaningful data from reports.

- To enhance readability and improve data extraction in annual reports, reducing repetitive methodologies and overly detailed explanations of past results is recommended. Presenting trends in summary tables (with total columns where applicable) would allow for clearer comparisons, while large tables of survey results may be more effectively placed in Appendices, with key findings summarised in the main body of the report.
- The action and success of standard mitigation measures is vague. The BWF Owners Representative reports that, as the turbines are located on private land and BWF staff are generally limited to access roads and hardstand areas under turbines, they do not have much knowledge of what is happening beyond these immediate areas. The Fifth annual report summarises the following results for mitigation measures during the most recent monitoring period. These do not demonstrate active mitigation:
 - Removal of carrion: In the 2023 period there were no instances of an animal carcass within 200 metres of a turbine being reported by BWF personal
 - Control of stock (i.e. no grain feeding or lambing within 200 metres of turbines): It is acknowledged that BWF cannot control what landholders do on their property or farming practices
 - Pest Management: During the monitoring year, rabbit warrens and activity have not been reported within 200 metres of turbines.

3.9.3 Recommendations

The BBAMP states: “This management plan is adaptive; further refinements to the program will be included in periodic reports.”

Following three years of intensive monthly mortality detection and ‘at risk’ species monitoring, along with five years of incidental carcass finds, the primary risks to birds and bats at BWF have been identified. Raptors, particularly Wedge-tailed Eagles, and bats remain ongoing concerns.

It is recommended that Iberdrola, in consultation with BCS/CPHR, review and revise the BBAMP to ensure that its future objectives are Specific, Measurable, Achievable, Relevant, and Time-bound (SMART)

Other recommendations are:

1. The two Wedge-tailed Eagle mortalities in October and November 2023 should be recorded as a non-threatened species impact trigger. Additionally, on page 24 of the Fifth Annual Report, the Wedge-tailed Eagle mortality recorded in Year 2 should be corrected, and impact trends for this species reassessed.
2. Annual reports should be completed and any follow-on actions implemented more promptly to ensure timely responses to identified issues.
3. The timing of annual reports should be reviewed, in consultation with the Secretary, to align with calendar years or key monitoring events for improved consistency and comparability.
4. Comparing bird and bat mortality rates at BWF with other wind farms would provide valuable context, what constitutes a ‘normal’ or ‘acceptable’ mortality limit? As recommended in the Fifth Annual Report, greater stakeholder engagement and collaboration with third parties would enhance knowledge of wind farm impacts on wildlife and improve mitigation measures.

5. Revising the structure of the annual BBAMP report such as including an executive summary would enhance readability and help readers extract key findings more efficiently

6. In consultation with BCS/CPHR, a research collaboration with the scientific community (e.g., sponsoring a study on Wedge-tailed Eagle and/or bat populations and mortality at BWF) could reduce the financial burden of repeated carcass detection surveys while contributing meaningful data to the BBAMP. Another alternative is to explore remote sensing technology.

3.10 Complaints

No complaints from the public have been recorded since the 2022 audit.

3.11 Incidents

No incidents have been reported since the 2022 audit.

3.12 Environmental performance

Measurement of environmental performance in this audit has been assessed by:

- 1) An assessment of compliance with the conditions of the Project Approval and EPL and the adequacy of strategies, plans or programs required under the Project Approval
- 2) A review of the relevant environmental management plans still being implemented on site
- 3) An assessment of regulatory action, environmental incidents and complaints as an indicator of environmental performance.

Overall environmental performance of the BWF is adequate. The BWF has an effective management structure and team, is committed to safety, environment and rehabilitation. It has multiple policies, procedures and systems in place to ensure compliance with all relevant conditions

This is demonstrated by the Health, Safety and Environment Commitments outlined in the Iberdrola Health, Safety & Environment policy which is prominently displayed within the BWF O&M building:

At the core of our values is the health and safety of our people and the environment and communities in which we operate. This means we are in relentless pursuit of creating a future where our peoples, communities and environment thrive and are not harmed by our activities.

3.13 Actual verses predicted environment impacts

As discussed in the 2022 audit, the clearing registers show 1.04 hectares of native vegetation clearance for the establishment of the wind farm and 1.3175 hectares for the electricity transmission line, totalling an impact to 2.3275 hectares of native vegetation. This total is less than the three hectares approved by the Secretary on 24/11/2017. Offset obligations for this impact to biodiversity have been met through payment into the NSW Biodiversity Conservation Trust (BCT).

Revegetation monitoring concluded areas requiring rehabilitation overall had become 'well-established, in good health and self-sustaining' and all areas are now considered to have met the performance criteria and can therefore said to be compliant.

Community concerns, including noise, visual amenity, shadow flicker, weeds, pests, and aerial spraying, appear to have been adequately managed, with no reported community complaints.

Bird and bat impact analysis under the BBAMP remains ongoing.

For details on the compliance assessment of environmental impacts, refer to Appendix A.

Review of documentation and site inspection indicated the environmental impact of the project has been within the predicated and approved limits.

3.14 Site inspection and interviews

Site inspection and interview revealed BWF is a well-organised and well-resourced. All requested information was readily available, legible, complete, stored in a cloud-based filing system in logical categories and willingly provided.

Findings of the site inspection and interviews are outlined against relevant Approval conditions in Appendix A.

3.15 Key strengths

BWF is committed to safety, environment and rehabilitation. It has multiple policies, procedures and systems in place to ensure compliance with all relevant conditions and is upholding its commitments to value the health and safety of the people and the environment and communities in which they operate.

One of the key strengths is BWFs ongoing commitment to community engagement and contributions which focusses on building strong relationships and giving back to the community in practical and meaningful ways⁵.

Iberdrola has a commitment to fostering a circular economy and giving back to the environments in which they operate and aim to a target of being net positive in biodiversity. This is exhibited by their collaboration with the scientific community to install Spotted-tail Quoll dens and nesting boxes (designed to last 40-50 years) for sugar gliders and possums on site at BWF⁶ in 2024.

3.16 Limitations

The findings of this Independent Environmental Audit (IEA) are based on visual observations of the BWF site and its vicinity, interviews with site personnel, and review of documentation provided during the audit process.

An assessment of the general adequacy and compliance of key management plans against Project Approval conditions was conducted. However, AREA did not perform a detailed or technical review of all management plans and associated documents.

Where this IEA references information provided by third parties, AREA has not independently verified this information, except where explicitly stated (e.g., actual native vegetation clearing has not been cross-checked against clearing registers). AREA assumes no liability for any inaccuracies or omissions in third-party data.

⁵ See Youtube video which illustrated BWFs community involvement [IBERDROLA AUSTRALIA; BODANGORA COMMUNITY INVOLVEMENT](#).

⁶ See Youtube video which illustrated Iberdrolas net positive biodiversity commitment [Helping Spotted-tail Quoll populations to recover in NSW's Central West](#)

Due to the sampling nature of this audit, some issues, non-compliances, or areas for improvement may not have been identified in this report. However, this does not imply that such issues do not exist or that all aspects comply.

Employees, management, and other stakeholders remain responsible for ongoing quality management by continuously identifying and addressing compliance requirements to ensure adherence to project conditions and relevant legislation.

The findings and opinions in this report reflect the site conditions at the time of the audit and are based on information provided by BWF and GE representatives, as well as government agencies. Any changes to this information or additional details not disclosed at the time of the audit are not considered in this report.

4 Recommendations

4.1 Non-compliances

No Non-compliances were identified.

4.2 Opportunities for improvement

Areas recommended for improvement are outlined in Table 4-1 below.

Table 4-1: Areas recommended for improvement

Relevant Condition of Consent	Recommendation
Condition C6 – Bird and Bat Monitoring and Management	<p>Two Wedge-tailed Eagle (WTE) mortalities, recorded in October and November 2023, should be classified as a non-threatened species impact trigger. Additionally, on page 24 of the Fifth Annual Report, the WTE mortality recorded in Year 2 should be corrected. Given this discrepancy, impact trends for this species should be reassessed.</p> <p>The Fifth Annual Report also states that “WTE mortality is to be documented photographically to ensure an age estimate can be recorded and reported to BCS within five business days of species identification.” It is unclear whether this procedure was followed for the two WTE mortalities detected in 2023.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Annual reports should be completed promptly, with follow-up actions implemented in a timelier manner. • The timing of annual reports should be reviewed, in consultation with the Secretary, to better align with calendar years or key monitoring events. • Following three years of intensive monthly mortality detection and ‘at-risk’ species monitoring, along with five years of incidental carcass findings, the primary risks to birds and bats at BWF have been identified with raptors (particularly Wedge-tailed Eagles) and bats remaining an ongoing concern. • Iberdrola, in consultation with BCS, should review and revise the BBAMP to ensure its future objectives align with the SMART framework (Specific, Measurable, Achievable, Relevant, and Time-bound).
Condition D4 – Provision of Electronic Information	<p>The following documents are overdue for their annual review:</p> <ul style="list-style-type: none"> • Compliance Tracking Program – Requires an annual review. Additionally: <ul style="list-style-type: none"> • Table 3.3 should be updated to reflect the completion of the 2018 audit. • On page 10, the reference to CEMP should be corrected to OEMP. • Pollution Incident Response Management Plan – Overdue for annual review. • Operational Environmental Management Plan (OEMP) – Overdue for annual review. <p>While annual reviews are an internal requirement of the proponent, they are necessary to maintain consistency within these documents. The BWF Owners Representative has reported that the 2024 annual reviews are currently in progress within the internal review process.</p> <p>Recommendation:</p> <p>Consider expediting the internal review process to ensure reviews occur in a more timely manner, or reassess the review timetable to improve efficiency.</p>

5 Conclusion

No non-compliances were identified.

A detailed 'Independent Audit Table', outlining audit findings, comments, and recommendations, is provided in Appendix A.

The compliance performance of BWF is assessed as adequate, supported by an effective management structure and team with a strong commitment to health, safety, environment, and rehabilitation. The project has established comprehensive policies, procedures, and systems to ensure compliance with all relevant conditions.

The BWF Project is considered compliant with Project Approval MP 10_0157 and Environmental Protection Licence 20927. Project documentation and operations were found to be sufficiently robust, had received the necessary approvals, and were effectively implemented during both the commissioning and operational phases. However, some documents are overdue for their annual review.

Following five years of bird and bat mortality monitoring, it is recommended that Iberdrola, in consultation with CPHR (formally BCS), review and revise the BBAMP to ensure its future objectives align with the SMART framework (Specific, Measurable, Achievable, Relevant, and Time-bound).

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Appendix A – Independent Audit Table

Definition of Compliance Status (as per DPIE Independent Audit Post Approval Requirements)

C	Compliant
NC	Non-compliant
NT	Not triggered

A note about the different entities referred to in this IEA:

Bodangora Wind Farm (BWF) is a wholly owned subsidiary of Iberdrola. Iberdrola was formally known as Infigen. The engineering, procurement and construction (EPC) of the BWF project was undertaken by the civil engineering construction Principal Contractor company CATCON, partnered with GE Renewable Energy (GE). GE continues on as the contractors for the Operation and Management (O&M) of the BWF, in conjunction with Iberdrola.

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
SCHEDULE B – ADMINISTRATIVE CONDITIONS					
TERMS OF APPROVAL					
B1	The Proponent shall carry out the Project: (a) generally in accordance with the EA; and (b) in accordance with the conditions of this approval	All evidence collected to inform this IEA outlined in this table is relevant to the EA and Bodangora Wind Farm (BWF) Project Approval Conditions. Generally, the Project has been carried out in accordance with the EA and Project Approval.	Considered compliant	C	-
B2	In the event of an inconsistency between the documents referred to in condition B1, the most recent document shall prevail to the extent of any inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	Noted	Not triggered	NT	-
B3	The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> any strategies, plans, programs, reviews, audit correspondence that are submitted in accordance with the requirements of this approval; any report, reviews or audits commissioned by the Department regarding compliance with this approval; and the implementation of any actions or measures contained in these documents. 	Evidence was available during the audit to demonstrate that the Proponent complies with all requests from the Secretary.	Considered compliant	C	-
B4	Subject to confidentiality, the Proponent shall make all documents required under this Approval available for public inspection on request.	The auditor is unaware of any refused request.	Considered compliant	C	-
LIMITS OF APPROVAL					
B5	This Approval lapses 5 years after the date of this Approval unless the Proponent has confirmed to the satisfaction of the Secretary that orders have been placed for wind turbines, or demonstrated that work subject of this Approval has been completed on the Site before the date on which the Approval would otherwise lapse under this condition. Work, for the purpose of this condition includes at least one of the following: (a) internal track construction; (b) civil works associated with the construction of the foundations for the wind turbine footings; (c) control room construction; (d) electrical substation construction; (e) underground cabling; or (f) internal overhead transmission line construction.	Work on the project is now complete and the Project is now in operation.	Considered compliant	C	-
B6	The Project shall not exceed 33 wind turbines.	Evidence: <ul style="list-style-type: none"> Review of approval documents Satellite imagery Site inspection. 	Considered compliant	C	-
B7	Prior to the commencement of construction, the Proponent shall provide written evidence to the satisfaction of the Secretary that the lease agreements with the site landowners have adequate provisions to require that the that decommissioning occurs in accordance with this Approval and is the responsibility of the Proponent.	As discussed in the construction IEA conducted by J2M Systems in July 2018 this issue is considered by Infigen (Iberdrola) to have been managed prior to project funding and approval to proceed. Evidence: <ul style="list-style-type: none"> BWF Decommissioning & Rehabilitation Plan 23 June 2017 which states: <i>'The Bodangora Wind Farm lease agreements have adequate provisions to require that decommissioning occurs in accordance with the Approval and is the responsibility of Bodangora Wind Farm Pty Ltd. In compliance with Project Approval B7, written evidence has been provided to the Department of Planning and Environment (DPE). Approval of this was received from the DPE on 14th December 2016.'</i> 	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		<ul style="list-style-type: none"> Director General's Environmental Assessment Report – Major Project Assessment: Bodangora Wind Farm, Page 52 which states: <i>'The Department is satisfied that these matters (in regard to decommissioning) have been adequately addressed.'</i> 			
B8	If any wind turbine is not used for the generation of electricity for a continuous period of 12 months, it shall be decommissioned by the Proponent, unless otherwise agreed by the Secretary. The Proponent shall keep independently verified annual records of the use of wind turbines for electricity generation. Copies of these records shall be provided to the Secretary upon request. The relevant wind turbine and any associated infrastructure is to be dismantled and removed from the site by the Proponent within 18 months from the date that the wind turbine was last used to generate electricity.	<p>All 33 turbines are currently commissioned and operational – Iberdrola, and its maintenance partner GE, have multiple platforms and systems which continuously monitor turbine function and output.</p> <p>All records are available for audit or verification if required such as for EPA, DPIE and Australian Energy Market Operator (AEMO).</p>	Considered compliant	C	-
Statutory Requirements					
B9	The Proponent shall ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the Project. No condition of this approval removes the obligation of the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the Project.	<p>BWF was approved under (since repealed) Section 75J of the Environmental Planning & Assessment Act as a <i>Part 3A Major infrastructure and other projects</i>. Original Project Approval (MP 10_0157) has since been modified 4 times, current version is Modification 4, December 2017.</p> <p>Project Approval and Environmental Protection Licence (EPL) are the main licences, permits, and approvals required and obtained for the project.</p> <p>Evidence sighted:</p> <ul style="list-style-type: none"> Environmental Protection Licence 20927(29-Jun-2017), due for review 29 Jun 2022. EPL available on website and sighted during the audit Project Approval available on website and sighted. 	Considered compliant	C	-
B10	For the purpose of section 75S(2)(b) of the EP&A Act, the relevant provisions, as defined in section 75S(1A) of the EP&A Act, apply to this approval. <i>Note: This condition is relevant to construction and occupation certificates for the Project</i>	<p>This Condition relates to erection and occupation of buildings. As discussed in the construction IEA conducted by J2M Systems in 2018, construction certificates were provided on request.</p> <p>Occupation Certificate OC-18360 from Blackett Maguire and Goldsmith dated 31/01/2019 was sighted.</p>	Considered compliant	C	-
STAGING					
B11	<p>With the approval of the Secretary, the Proponent may submit any plan or program required by this approval on a progressive basis.</p> <p>To ensure the plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Proponent may prepare any revised plan or program without undertaking consultation with all the parties referred to under the relevant condition of this approval.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <i>While any plan or program may be submitted on a progressive basis, the Proponent must ensure that all development being carried out on site is covered by suitable plans or programs at all times.</i> <i>If the submission of any plan or program is to be staged, then the relevant plan or program must clearly describe the specific stage to which the plan or program applies, the relationship of this stage to any future critical stages, and the trigger for updating the plan or program.</i> 	<p>The Project was not staged but has been modified four times since original approval. All plans and programs required by this approval have been submitted and approved. Construction is now complete and this condition is not triggered.</p>	Not triggered	NT	-
B12	Deleted	-	-	-	-
COMPLIANCE					
B13	Deleted	-	-	-	-
B14	Deleted	-	-	-	-
B15	In the event of a dispute between the Proponent and a public authority, in relation to an applicable requirement in this Approval or relevant matter relating to the Project, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	The auditor was not aware of any such matter.	Not triggered	NT	-
PLANNING AGREEMENT					
B16	The Proponent shall implement the Planning Agreement entered into with Council, dated 12 March 2012 (or as updated), unless otherwise agreed by Council. The contributions shall be consistent with the general terms of agreement between Council and the Proponent, including: (a) development contributions towards a community benefit fund, road maintenance, and Project related Council Administration; and (b) agreed arrangements regarding the Traffic Study to be undertaken and the consequential road upgrade works, at the expense of the Proponent.	<p>The Construction IEA conducted by J2M Systems in 2018 states this condition appears to have been managed.</p> <p>The planning Agreement between Wellington Council (now Dubbo Regional Council) and BWF 01/03/2013 was accessed via Dubbo Regional Council Website.</p> <p>Correspondence with Peter James from Dubbo Regional Council on 21/5/2019 was viewed which stated:</p> <p><i>I have reviewed the Post-Construction Dilapidation Road Report for the Bodangora Wind farm that you have provided and agree that all items required in the construction phase of the Voluntary Planning Agreement (between CATCON and Dubbo Regional Council) have been satisfactorily closed out.</i></p>	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		Dubbo Regional Council was contacted in February 2025 for comment and to confirm that BWF has been meeting the obligations of the Planning Agreement and has making ongoing contributions to the Bodangora Community Fund. A reply from council was received on 04/03/2025 which reported <i>the contributions requirement is operating satisfactorily</i> , see Section 3.8 and Appendix C. BWF Owners Representative reports regular positive engagement with council staff over various matters and development contributions are made as per the Planning Agreement.			
MICRO-SITING RESTRICTIONS					
B17	The Proponent may micro-site the wind turbines and ancillary infrastructure without further approval provided: (i) no wind turbine is moved more than 100 metres from the relevant GPS coordinates in Appendix 1; (ii) the revised location of the wind turbine is at least 30 metres from existing hollow-bearing trees; or where the approved turbine location is already within 30 metres of existing hollow-bearing trees, the revised location of the turbine is not moved any closer to existing hollow-bearing trees; (iii) no ancillary infrastructure (other than access tracks) is moved more than 100 metres from the location shown on the figure in Appendix 1; (iv) any access tracks remain within the access track corridor shown on the figure in Appendix 1; and (v) the revised location of the wind turbine and/or ancillary infrastructure would not result in any non-compliance with the conditions of this approval. <i>Note: Turbines 28 and 31, the section of access track between turbine 25 and 26 and the section of underground cabling between turbine 26 and 27 cannot be micro-sited further from the locations shown in Appendix 1.</i>	This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states this condition appears to have been managed.	Not triggered	NT	-
FINAL LAYOUT PLANS					
B18	Prior to the commencement of construction, the Proponent must submit detailed plans of the final layout of the Project to the Secretary, including: (a) details on the micro-siting of any wind turbines and/or ancillary infrastructure; and (b) the GPS coordinates of the final wind turbine locations. <i>Note: If the construction of the Project is to be staged, then the provision of these plans may be staged.</i>	This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states this condition appears to have been managed.	Not triggered	NT	-
NOTIFICATION TO DEPARTMENT					
B19	Prior to the commencement of the construction, operation and/or decommissioning of the Project or the cessation of operations, the Proponent must notify the Department in writing of the date of commencement or cessation. If the construction, operation and/or decommissioning of the Project is to be staged, then the Proponent must: (a) notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage; and (b) inform the local community and the Community Consultation Committee (CCC) about the proposed staging plans.	No commencement of construction, operation or commissioning has occurred in this audit period. This condition has not been triggered.	Not triggered	NT	-
SCHEDULE C – ENVIRONMENTAL PERFORMANCE					
BIODIVERSITY					
Operating Conditions					
C1	The Proponent must: (a) ensure that no more than 1.32 hectares (ha) of native vegetation is cleared for the Project, unless the Secretary agrees otherwise; (b) minimise: • impacts on hollow-bearing trees; • impacts on threatened bird and bat populations; and • the clearing of native woodland vegetation and fauna habitat.	This condition was addressed in the 2022 audit: Whilst the original approval for the project allowed for a clearing limit of 1.32 hectares, detailed investigation of the transmission line route and consultation with TransGrid identified that the project would result in additional clearing of native vegetation to minimise the bushfire risk associated with operation in the transmission line, requiring the clearing limit be increased from 1.32 hectares to 3 hectares. The proponent consulted with the DPE and OEH and was granted approval to increase the clearing limit, providing the additional area is appropriately offset (see Condition C7). The clearing registers show 1.04 hectares of native vegetation clearance for the establishment of the wind farm and 1.3175 hectares for the electricity transmission line, totaling 2.3275 hectares of native vegetation. This total is less than the 3 hectares approved by the Secretary on 24/11/2017. Impacts to fauna habitat and vegetation has been minimised as far as possible – review of aerial imagery shows how trees have been avoided as far as possible by strategic placement of wind turbines and roads.	Considered compliant	C	-
C2	Tree trunks and major branches from cleared trees should be used, to the fullest extent practicable, to enhance habitat (coarse woody debris) in rehabilitated areas or in derived native grassland (either in offset areas or areas adjoining impacted areas) and details	This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit.	Not triggered	NT	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	included in the Construction Biodiversity Management Plan required by condition E21(f).	The Construction IEA conducted by J2M Systems in 2018 states this condition appears to have been managed.			
C3	Deleted	-	-	-	-
C4	Deleted	-	-	-	-
C5	Deleted	-	-	-	-
Bird and Bat Monitoring and Management					
C6	Prior to the commencement of construction, the Proponent shall prepare and submit for the approval of the Secretary a Bird and Bat Adaptive Management Program, which takes into account bird / bat monitoring methods identified in the current editions of AusWEA Best Practice Guidelines for the Implementation of Wind Energy Projects in Australia and Wind Farm and Birds: Interim Standards for Risk Assessment. The Program shall be prepared in consultation with OEH and implemented by a suitably qualified expert, approved by the Secretary. The Program shall incorporate Monitoring, and a Decision Matrix that clearly sets out how the Proponent will respond to the outcomes of monitoring. It shall:	<p>The Bird and Bat Adaptive Management Program (BBAMP) dated June 2017 is available on lberdrola Website. The BBAMP states the following in Section 1.2:</p> <p><i>'The consent condition for the BODW1 (BWF) requires that this program be informed by AusWEA (2005), the Australian interim bird risk assessment standards for wind farms. The methods and reporting standards in this document have been adopted, with adaptation to reflect more recent technical development and regulator input'</i></p> <p>The BBAMP for Bodangora Wind Farm (BWF) was approved by the Secretary June 2017 (letter dated 07/06/2017) which states:</p> <p><i>'The Department has reviewed the final version of the BBAMP and is satisfied that it is consistent with the requirements of Condition C6 of the project approval. The Department also notes that the BBAMP has been prepared in consideration of comments provided by the Office of Environment and Heritage (OEH) and that OEH is satisfied that its comments have been adequately addressed.'</i></p> <p>The program was developed as per AusWEA Best Practice Guidelines for the Implementation of Wind Energy Projects in Australia and Wind Farm and Birds: Interim Standards for Risk Assessment. The program incorporates monitoring and a decision making framework for identifying and mitigating impact triggers. Consultation with OEH has occurred throughout the implementation of the BBAMP.</p> <p>The BBAMP is compliant with this condition.</p>	Considered compliant	C	-
	(a) incorporate an ongoing role for the suitably qualified expert;	<p>Evidence sighted</p> <ul style="list-style-type: none"> Curriculum Vitae for Brendan O'Callaghan Curriculum Vitae for Brett Lane Nature Advisory website (formerly Brett Lane and Associates) was accessed in February 2025. <p>Nature Advisory is a specialist ecological consultancy with a wealth of experience in preparing and implementing bird and bat impact monitoring programs for wind farms. Brendan O'Callaghan, Senior Ecologist and Project Manager, and Brett Lane, Principal Consultant at Nature Advisory were nominated in the approved plan and nominated to implement the plan.</p> <p>The BBAMP is compliant with this condition.</p>	Considered compliant	C	-
	(b) set out monitoring requirements in order to assess the impact of the Project on bird and bat populations, including details on survey locations, parameters to be measured, frequency of surveys and analyses and reporting. The monitoring program shall be capable of detecting any changes to the population of birds and / or bats that can reasonably be attributed to the operation of the Project, that is, data may be required to be collected prior to the commencement of construction;	<p>The BBAMP refers to pre-approval and pre-construction investigations and has incorporated this data into the program.</p> <p>The BBAMP also states a range of approaches will be utilised post-construction to meet the requirements of the conditions of approval.</p> <p>The key species and groups identified in the BBAMP risk assessment, and during discussions with OEH were: Superb Parrot, Grey Crowned Babbler, Wedge-tailed Eagle, Raptors and the White-Throated Needletail.</p> <p>Monthly mortality assessment occurred for 24 months from June 2019 to May 2021 as well as the following local population census' and surveys:</p> <ul style="list-style-type: none"> Grey-crowned Babblers – pre-construction survey July 2017 then monthly surveys of for the 12 month period August 2019 to July 2020 Superb Parrot – pre-construction survey 2017 /2018 then monthly incidental reporting of all Superb Parrot observed was conducted across the entirety of each field visit. Incidental reporting of all raptors observed was conducted across the entirety of each field visit. Incidental reporting of White-throated Needletail observed was conducted across the entirety of each field visit. A bat utilisation survey was undertaken 2021 which identified up to 17 bat species inhabiting the site. <p>All turbines have been sampled during the initial 24 month mortality assessments.</p> <p>Another 12 months of monthly mortality detection surveys plus incidental raptor monitoring occurred January 2023 to December 2023. Incidental finds have continued to be reported throughout the construction and operation of the project. On site freezer to store incidental carcass finds was sighted during site inspection in February 2025, see Photo Reference 9.</p> <p>Findings, recommendations and results have evolved throughout the BBAMP implementation. At the end of the initial 24 month monitoring period, the risk to Grey-crowned Babblers, White-throated Needletail and Superb Parrot was considered low and no further surveys were recommended.</p>	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		Raptors and bats remain an ongoing concern. The BBAMP is compliant with setting out monitoring requirements which continue to evolve.			
	(c) incorporate a decision making framework that sets out specific actions and when they may be required to be implemented to reduce any impacts on bird and bat populations that have been identified as a result of the monitoring;	<p>Section 5 of the BBAMP outlines 'Impact triggers' and decision making framework which identifies the circumstances that result in notification, further investigation and additional mitigation for both threatened and non-threatened birds and bats ('impact triggers'). If an impact trigger is met, there must be an investigation into the cause of the impact, and whether the event was likely to be a one-off occurrence or a regular event. The decision making framework in the BBAMP outlines the steps to take for identifying and mitigating impact triggers.</p> <p>Multiple impact trigger events have occurred throughout implementation of the BBAMP, see Table 3-2 in Section 3.9 of this audit report, which have followed the decision making framework. Most of the events were determined to be a one-off occurrence unlikely to be significant at a regional population scale.</p> <p>During the 2021 Little-Red Flying Fox incident trigger mortality event, Biodiversity, Conservation & Science (BCS) collaborated with Iberdrola and their consultants, Nature Advisory. Following the 2021 Little-Red Flying Fox incident trigger mortality event a lighting trial was undertaken at BWF, which was subject to a permit amendment prior to having permission to be implemented, with the aim of deterring LRFF from approaching turbines and reducing mortality. The concept involved lighting the base and surrounding hardstand of turbines with flood lights to see if LRFF flying through the wind farm would be deterred from the turbine. Unfortunately, the LRFF had vacated the region before the efficacy of the measure could be tested, however this is planned to be trialed again, much sooner, if the species returns.</p> <p>The final Little Red Flying Fox Impact Report that was produced can serve as a solid basis in implementing timely mitigation measures should a similar event occur in the future and illustrates that the BBAMP meets this condition.</p> <p>The third annual BBAMP (2022) states the following: <i>BCS has requested the trigger point for investigation of Wedge-tailed Eagle (WTE) mortality at BWF be revised down to two carcasses found per year (BCS 2022). Which is to be implemented during the 2022/2023 monitoring period.</i></p> <p>The Fifth annual BBAMP report⁷ (November 2024) recorded two WTE eagle mortalities in October and November 2023 which were not recorded as an impact trigger, as per the agreement mentioned in the third annual report. Page 24 of the Fifth annual report also incorrectly reports past WTE mortality at BWF, as there were actually 8 casualties recorded in Year 2 (not 3).</p> <p>The Fifth annual report also states that <i>'WTE mortality to be documented photographically to ensure the age estimate can be recorded, and to be reported to BCS as soon as possible within 5 business days of species identification'</i> – it is unclear if this occurred for the two WTE mortalities detected in 2023.</p> <p>The BBAMP is considered compliant with incorporating a decision making framework. However, the WTE trigger in 2023 needs to be enacted and page 24 of the fifth annual report needs to be updated.</p>	<p>Considered compliant</p> <p>Recommendation: Two Wedge-tailed mortalities in October and November 2023 should be recorded as a non-threatened species impact trigger. Page 24 of the Fifth annual report, Wedge-tailed eagle mortality in Year 2, should be corrected.</p>	C	-
	(d) identify 'at risk' bird and bat groups, seasons, and / or areas within the Project site which may attract high levels of mortality and include monthly mortality assessments and periodic local population census' and bird utilisation surveys;	<p>Section 2 of the BBAMP outlines a 'Risk Assessment for Bodangora Wind Farm' which was used to identify 'at risk' bird and bat groups.</p> <p>The key species and groups identified in the BBAMP risk assessment, and during discussions with Department of Climate Change, Energy, the Environment and Water (DCCEEW) were: Superb Parrot, Grey Crowned Babbler, Wedge-tailed Eagle, Raptors and the White-Throated Needletail.</p> <p>Monthly mortality assessment occurred for 24 months from June 2019 to May 2021 as well as the following local population census' and surveys:</p> <ul style="list-style-type: none"> • Grey-crowned Babblers (BC Act) – pre-construction survey July 2017 then monthly surveys of for the 12 month period August 2019 to July 2020 • Superb Parrot (BC and EPBC Act) – pre-construction survey 2017 /2018⁸ then monthly Incidental reporting of all Superb Parrot observed was conducted across the entirety of each field visit. • Incidental reporting of all raptors observed was conducted across the entirety of each field visit. • Incidental reporting of White-throated Needletail (BC and EPBC Act) observed was conducted across the entirety of each field visit. • Following the 2021 Little-Red Flying Fox incident trigger mortality event a bat utilisation survey was undertaken 2021 which identified up to 17 bat species inhabiting the site. 	Considered compliant	C	-

⁷ The report is not yet available on the BWF website

⁸ The results of the surveys are outlined in the report by Brett Lane and Associates 2018, Bodangora Wind Farm, targeted Superb Parrot survey, Report No. 15124 (6.3), May 2018 (BL&A 2018).

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		<p>Another 12 months of monthly mortality detection surveys plus incidental raptor monitoring occurred January 2023 to December 2023. Incidentals finds have continued to be reported throughout the construction and operation of the project.</p> <p>All turbines have been sampled during the initial 24 month mortality assessments and the BBAMP - Second Annual Report, Nature Advisory, September 2021 summarises the spatial distribution of mortality which found that overall, higher mortality occurred at open/cleared turbines than at Woodland turbines.</p> <p>Findings, recommendations and results have evolved throughout the BBAMP implementation. At the end of the initial 24 month monitoring period, the risk to Grey-crowned Babblers, White-throated Needletail and Superb Parrot was considered low and no further surveys are recommended.</p> <p>Raptors, particularly Wedge-tailed Eagles, and bats remain an ongoing concern.</p> <p>The BBAMP is compliant with identifying 'at risk' bird and bat groups.</p>			
	(e) identify potential mitigation measures and implementation strategies in order to reduce impacts on birds and bats such as minimising the availability of raptor perches, swift carcass removal, pest control including rabbits, use of deterrents, and sector management including switching off turbines that are predicted to or have had an unacceptable impact on bird / bat mortality at certain times; and	<p>Section 4 of the BBAMP outlines standard mitigation measures to be implemented as required:</p> <ul style="list-style-type: none"> Removal of carrion Grain feeding (stop grain feeding practices within 250m of operating wind turbines), <p>and Section 5.3 outlines some Supplementary Mitigation measures 'which could be implemented in the event of an unacceptable impact trigger occurring' outlined in Section 5.3.</p> <p>Mitigation measures and implementation strategies are identified and discussed within the BBAMP annual reports.</p> <p>Following the 2021 Little-Red Flying Fox incident trigger mortality event a lighting trial was undertaken at BWF, which was subject to a permit amendment prior to having permission to be implemented, with the aim of deterring LRFF from approaching turbines and reducing mortality. The concept involved lighting the base and surrounding hardstand of turbines with flood lights to see if LRFF flying through the wind farm would be deterred from the turbine. Unfortunately, the LRFF had vacated the region before the efficacy of the measure could be tested, however this is planned to be trialed again, much sooner, if the species returns.</p> <p>The final Little Red Flying Fox Impact Report that was produced can serve as a solid basis in implementing timely mitigation measures should a similar event occur in the future and illustrates that the BBAMP meets this condition.</p> <p>Fifth annual report summarises the following results for mitigation measures during the most recent monitoring period:</p> <ul style="list-style-type: none"> Removal of carrion: In the 2023 period there were no instances of an animal carcass within 200 metres of a turbine being reported by BWF personnel Control of stock (ie no grain feeding or lambing within 200 metres of turbines: It is acknowledged that BWF cannot control what landholders do on their property or farming practices Pest Management: During the monitoring year, rabbit warrens and activity have not been reported within 200 metres of turbines. Supplementary Mitigation Measures: Supplementary mitigation measures will be implemented in consultation with BCS if an impact trigger occurs. The purpose of supplementary mitigation measures will be to prevent a specific impact from continuing to occur. Specific mitigation measures will be implemented depending on the nature, cause and significance of any impact recorded and in response to the results of investigations of the event and of the species concerned on the wind farm site. The purpose of investigations will be to identify clearly the most relevant and effective mitigation measures. <p>The BBAMP is compliant with 'identifying potential mitigation measures and implementation strategies in order to reduce impacts of birds and bats'.</p> <p>The final Little Red Flying Fox Impact Report that was produced can serve as a solid basis in implementing timely mitigation measures should a similar event occur in the future and illustrates that the BBAMP meets this condition.</p>	Considered compliant	C	-
	(f) identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the application of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success.	<p>The BBAMP Section 3.5 outlines 'Routine reporting and Review Meetings requirements': <i>Reports will be submitted to the Secretary and OEH as per the project approval conditions. Matters to be addressed in the report include, but will not be limited to:</i></p> <ul style="list-style-type: none"> A description of the BBAMP activities undertaken during the reporting year; A summary of the search methodologies and searches undertaken Details and results of the carcass searches Observation from the Superb Parrot surveys Observation from the Babbler monitoring and Any identified impact triggers and/or recommended updates to the BBAMP risk assessment 	<p>Considered compliant</p> <p>Recommendation: It is recommended that Iberdrola, in consultation with BCS, review the BBAMP moving forward to ensure the future objectives of the plan are Specific, Measurable, Achievable,</p>	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		<ul style="list-style-type: none"> Any recommended changes to survey effort based on the results of the surveys. <p>At the end of the second year of post-construction monitoring, an overall assessment will be made of all the data obtained during the first two years of BBAMP implementation, details of the management practices implemented, as well as recommended adjustments. The results of the review and its implications will be discussed with OEH.</p> <p>Annual reports prepared for years beyond the first two years will include the results of any monitoring activities undertaken for that year and a discussion regarding any impact triggers or unacceptable impacts identified, mitigation measures implemented and application of the decision making framework.</p> <p>The second annual BBAMP report (2021) addressed all the points mentioned above and concluded:</p> <p>Two years of mortality search data have provided a useful baseline set of data to gain an understanding of the impact that the wind farm is having on bird and bat species in the region. Extension of the formal carcass monitoring program is not recommended.</p> <p>In-depth research and discussion with BWF and BCD regarding new potential mitigation measures would be required to understand how any such further measure might apply in modern Australian wind farm settings and whether these would be viable.</p> <p>Mitigation measures are addressed in periodic reports. The final Little Red Flying Fox Impact Report that was produced sets an example of implementing timely mitigation measures should a similar event occur in the future and illustrates that the BBAMP meets this condition.</p> <p>The third annual BBAMP (2022) states the following:</p> <p>Consultations between BCS, BWF and Nature Advisory since the second annual report have resulted in the decision to implement a third year of carcass monitoring, using a scent detection dog. A new program of carcass monitoring was implemented, targeting detection of small (i.e. microbat) carcasses as well as collecting further details on Wedge-tailed Eagle mortalities over time. This will consist of monthly searches out to 60 m to target small carcasses and searches every 4 months out to 100 m (to detect WTE) using the scent detection dog (Nature Advisory 2022a, BCS 2022). The results of this monitoring will inform the need for further monitoring to understand patterns of bird and bat mortality at BWF over time.</p> <p>This monitoring program occurred January 2023 to December 2023.</p> <p>The third BBAMP report also stated:</p> <p>BCS has requested the trigger point for investigation of Wedge-tailed Eagle (WTE) mortality at BWF be revised down to two carcasses found per year (BCS 2022). Which is to be implemented during the next 2022/2023 monitoring period. It is further suggested that continued effort is made to remove prey items of WTE from close proximity of operating turbines. This includes rabbits and their warrens, and any dead sheep or kangaroo carcasses within this distance (discussed further in Section 5). Wind farm personnel should continue to record any carcasses identified due to incidental finds at BWF as per the incidental carcass finds process.</p> <p>The fifth annual BBAMP report⁹ (November 2024) recorded two WTE eagle mortalities in October and November 2023 which were not recorded as an impact trigger, as per the agreement mentioned in the third annual report. Page 24 of the fifth annual report also incorrectly reports past WTE mortality at BWF, as there were actually 8 casualties recorded in Year 2 (not 3).</p> <p>As per its' title, the BWF BBAMP is an 'adaptive' program, section 3.5 states:</p> <p>As this management plan is adaptive, further refinements to the program will be included in periodic reports following the second year of post-construction monitoring and will be based on the outcomes of monitoring surveys and report and impacts'</p> <p>BWF continues to take on feedback from BCS/CPHR about the BBAMP. Correspondence from CPHR dated 20/02/2025 regarding the Fifth Annual BBAMP Report was sighted which stated:</p> <p>We have reviewed the revised report and note that revisions to the plan have been made that address comments made in our correspondence dated 14 October 2024.</p> <p>CPHR is satisfied that the Fifth Annual BBAMP fulfills the requirements of the BBAMP.</p> <p>The BBAMP is considered compliant with identifying matters to be addressed in periodic reports and has demonstrated that progress with mitigation is possible.</p> <p>Recommendation:</p> <p>Following three years of intensive monthly mortality detection and 'at risk' species monitoring, combined with 5 years of incidental carcass finds, the main risks to bird and bats by BWF have been identified – raptors, particularly Wedge-tailed eagles and bats</p>	Relevant and Time bound (SMART).		

⁹ The report is not yet available on the BWF website

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		<p>remain an ongoing concern. It is recommended that Iberdrola, in consultation with BCS, review the BBAMP moving forward to ensure the future objectives of the plan are Specific, Measurable, Achievable, Relevant and Time bound (SMART). See Section 3.9.3 of this report for more specific recommendations.</p> <p>Additionally, the WTE trigger in 2023 needs to be enacted and the Wedge-tailed eagle mortality in Year 2 on page 24 of the fifth annual report needs to be updated.</p>			
	<p>The Reports referred to under part (e¹⁰) shall be submitted to the Secretary and OEH on an annual basis for the first five years of operation and every two years thereafter (unless otherwise agreed to by the Secretary) and shall be prepared within two months of the end of the reporting period. The Secretary may, at the request of the Proponent at anytime, vary the reporting requirement or period by notice in writing to the Proponent.</p>	<p>Annual reports have been submitted to the Secretary and OEH on an annual basis for the first 5 years of operation (up to 2024).</p> <p>Annual reports are mostly not dated within two months of the end of the reporting period – particularly the 5th annual report which appears to only cover July 2023 to December 2023 and is dated November 2024. The time delay between when a monitoring finishes, is then reported and then actioned means that large periods of time are going by without any meaningful data being collected, such as:</p> <ul style="list-style-type: none"> • 18 months between the end of monthly carcass detection surveys in May 2021 and the recommencement of detection surveys in January 2023 • Carcass detection surveys were completed in December 2023 and already more than 12 months have passed without any further planning in regard to future monitoring actions <p>Annual reports should be completed, then determined follow-on actions enacted in a timelier fashion.</p> <p>Annual reporting not lining up with calendar years makes it hard to keep track of annual trends – especially for the 12 months of carcass monitoring using scent detection dogs from January to December 2023 which was reported over two annual reports.</p> <p>Timing of annual reports should be reviewed, in consultation with the Secretary.</p>	<p>Considered compliant</p> <p>Recommendation:</p> <p>Annual reports should be completed, then determined follow-on actions enacted in a timelier fashion.</p> <p>Moving forward, timing of annual reports should be reviewed, in consultation with the Secretary, to line up with calendar years or monitoring events.</p>	C	-
	<p>The Proponent is required to implement feasible and reasonable mitigation measures as identified under part (d¹¹) where the need for further action is identified through the Bird and Bat Adaptive Management Program, or as otherwise agreed with the Secretary.</p>	<p>Mitigation measures and implementation strategies are identified and discussed within the BBAMP annual reports.</p> <p>Following the 2021 Little-Red Flying Fox incident trigger mortality event a lighting trial was undertaken at BWF, which was subject to a permit amendment prior to having permission to be implemented, with the aim of deterring LRFF from approaching turbines and reducing mortality. The concept involved lighting the base and surrounding hardstand of turbines with flood lights to see if LRFF flying through the wind farm would be deterred from the turbine. Unfortunately, the LRFF had vacated the region before the efficacy of the measure could be tested, however this is planned to be trialed again, much sooner, if the species returns.</p> <p>The final Little Red Flying Fox Impact Report that was produced can serve as a solid basis in implementing timely mitigation measures should a similar event occur in the future and illustrates that the BBAMP meets this condition.</p> <p>The BBAMP has demonstrated it can implement feasible and reasonable mitigation measures when required.</p> <p>Considered compliant</p>	<p>Considered compliant</p>	C	-
Biodiversity Offset Package					
C7	<p>Following final design, and prior to commencement of construction in areas requiring native vegetation clearing, or as otherwise agreed to by the Secretary, the Proponent shall develop and submit a Biodiversity Offset Package for the approval of the Secretary. The Package shall detail how the ecological values lost as a result of the Project will be offset. The Biodiversity Offset Package shall be developed in consultation with the OEH and shall (unless otherwise agreed by the Secretary) include, but not necessarily be limited to:</p> <p>(a) the identification of the extent and types of habitat that would be lost or degraded as a result of the final design of the Project;</p> <p>(b) the objectives and biodiversity outcomes to be achieved (including 'improve or maintain' biodiversity values), and the adequacy of the proposed offset considered;</p> <p>(c) the final suite of the biodiversity offset measures selected and secured, including but not necessarily limited to:</p> <ol style="list-style-type: none"> an offset proposal which is supported by a suitable metric method (such as the Biobanking Assessment Methodology); details of the relative condition and values of communities on the offset site in comparison to those to be impacted, including all areas of derived native grassland in moderate to good condition; and 	<p>Evidence cited:</p> <ul style="list-style-type: none"> • Biodiversity Offset Package July 2022 available on BWF Website • Letter from Mike Young on behalf of the secretary on 24/11/2017 stating approving the increase in clearing limit and the BOP • Letter from Infigen to the Biodiversity Conservation Trust (BCT) with the following attachments: <ol style="list-style-type: none"> 1. Cover letter from Infigen to the BCT dated 09/10/2018 2. Application form for payment into the Biodiversity Conservation Fund by Infigen dated 08/10/2018 3. Statement of assessment of reasonable equivalence of biodiversity credits from OEH to BWF dated 3/08/2018 4. Biodiversity Offset Payment Calculator results dated 01/08/2018 5. Project boundary shape file • Section 6.33 certificate Statement confirming payment into the BCF for an offset obligation dated 31/8/2018 which is used to demonstrate to the consent authority that this biodiversity credit obligation has been met. 	<p>Considered Compliant.</p>	C	-

¹⁰ The auditor believes this actually should be a referral to part (f) and has addressed this as such

¹¹ The auditor believes this actually should be a referral to part (e) and has addressed this as such

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	<p>iii. proposed management actions and expected gains;</p> <p>(d) the monitoring requirements for compensatory habitat works and other biodiversity offset measures proposed to ensure the outcomes of the package are achieved, including:</p> <p>i. the monitoring of the condition of species and ecological communities at offset locations;</p> <p>ii. the methodology for the monitoring program(s), including the number and location of offset monitoring sites, and the sampling frequency at these sites; and</p> <p>iii. provisions for the annual reporting of the monitoring results for a set period of time as determined in consultation with the OEH;</p> <p>(e) timing and responsibilities for the implementation of the provisions of the Package;</p> <p>(f) evidence that the offset(s) has been acquired and / or is permanent and secure prior to the commencement of construction;</p> <p>(g) how securing the site addresses the residual impacts of the action on threatened species;</p> <p>(h) proposed long term funding for management actions as well as roles and responsibilities; and</p> <p>(i) key milestones, performance indicators, corrective actions and timeframes for the completion of all actions outlined in the Package.</p> <p>Land offsets shall be consistent with the Principles for the use of Biodiversity Offsets in NSW (OEH, 2011) and the Environmental Protection and Biodiversity Conservation Act 1999 – Environmental Offset Policy. Any land offset shall be enduring and be secured by a conservation mechanism which protects and manages the land in perpetuity. Where land offsets cannot solely achieve compensation for the loss of habitat, additional measures shall be provided to collectively deliver an improved or maintained biodiversity outcome for the region.</p> <p>Where monitoring indicates that biodiversity outcomes are not being achieved, feasible and reasonable remedial actions shall be undertaken to ensure that the objectives of the Biodiversity Offset Package are achieved.</p>	<p>The Biodiversity Offset Package (BOP) for the proposal was developed as per this condition and in consultation with the OEH to offset the impact of 3 hectares of native vegetation (as per Section B3). The BOP has been approved by the Secretary and is available on the proponent's website. The sequence for calculating and fulfilling the offsetting requirement occurs as follows:</p> <ol style="list-style-type: none"> 1. Infigen developed the approved Biodiversity Offset Package (BOP) under the Biobanking Scheme which concluded the project needed 40 credits of PCT281 and 73 credits of PCT266 (PCT = plant community type) 2. Initially Infigen was going to enter into a Biobanking agreement and establish an offset area within 'Glen Oak' to offset the credit requirement 3. In 2017 the change in legislation meant the Biobanking Assessment Methodology (BBAM) was replaced by the Biodiversity Assessment Method (BAM) 4. Infigen (Tim Maddever) then consulted with OEH and chose to pay into the Biodiversity Conservation Fund (BCF) under BAM rather than enter into the biobanking agreement 5. OEH then calculated a 'reasonable equivalence' of biodiversity credits and decided that 40 credits of PCT281 and 56 credits of PCT266 was needed to be offset for the project 6. Infigen paid the into the BCF for this offset obligation (\$254,451.42 on 31/8/2018) 7. The offset obligation has been met; no further action is required. <p>The Biodiversity Offset Package has been updated with additional information demonstrating how offset obligations have been met through payment into the BCF as per the 2022 audit, the updated document, dated July 2022, is available on the BWF website.</p> <p>A letter from the Planning department dated 18/11/2022 regarding the Biodiversity Offset Package was sighted which states:</p> <p><i>The Department notes that the BOP has been updated to confirm offset obligations and payment into the Biodiversity Conservation Trust in place of the original intent to offset via a Biobanking Agreement.</i></p> <p><i>Both the Department and Biodiversity Conservation Division (BCD) have reviewed the revised BOP and note that reasonable equivalence of biodiversity credits was obtained for the offset requirements and that payment to the Biodiversity Conservation Fund (BCF) was made to retire the biodiversity credit obligation in full.</i></p> <p><i>The Department and BCD have carefully reviewed the document and is satisfied that offset obligation has been retired in accordance with the NSW Biodiversity Offset Scheme.</i></p> <p><i>Accordingly, as nominee of the Secretary, I approve the revised Biodiversity Offset Package (Revision V2, dated 6 July 2022).</i></p> <p>No monitoring relevant to biodiversity offsetting is required.</p>			
WATER QUALITY AND HYDROLOGY					
C8	Except as may be provided by an EPL, the Project shall be constructed and operated to comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters.	<p>No water pollution incidents were reported to or identified by the auditor. The EPA public register for EPL 20927 shows no non-compliances recorded on annual returns since February 2019.</p> <p>A letter from the EPA Regulatory Operation Regional Acting Unit Head regarding Environmental Risk Assessment Outcomes – EPL 20927 – Bodangora Wind Farm dated 06/09/2023 was sighted which stated:</p> <p><i>The EPA has conducted its 5-yearly review of the licensee's environmental risk assessment. The assessment considered impacts of the day-to-day activities at the premise on the environment (air, odour, water and noise) and the risk of a pollution incident. Based on the recent assessment, the overall regulatory priority for the premises remains at Low.</i></p> <p>A Jira log reporting GE annual testing of the Pollution Incident Response Management Plan was sighted during the audit. <i>On 18/08/2023 the GE site team dealt with a pollution scenario and the team did extremely well in this simulation acting swiftly to contain the spill, set up an exclusion zone and notify applicable persons. Testing of the PIRMP must take place every 12 months.</i></p> <p>All evidence demonstrates BWF commitment to pollution prevention.</p>	Considered compliant	C	-
C9	Waterway crossings shall be designed and constructed in consultation with CL&W and DPI (Fisheries) and consistent with DPI (Fisheries) guidelines, Policy and Guidelines for Fish Friendly Waterway Crossings (2004) and Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004).	<p>The Construction IEA conducted by J2M Systems in 2018 states during construction this condition appears to have been managed citing the following evidence:</p> <p><i>Email from NSW DPI dated 14/11/2017 regarding Spicers Creek crossing. Email outlines approved under Condition C9 and E15, which required DPI consultation. Controlled activity license is not required as it is within the proposed construction areas. Gillinghall Road culverts not modified.</i></p> <p>See also Condition E13(b). This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit. CL&W and DPI Fisheries did not raise any concerns about waterway crossings during consultation in 2025.</p>	Not triggered	NT	-
NOISE					
C10	Any overhead transmission line associated with the Project shall be designed, constructed and operated to minimise the generation of corona and aeolian noise as far as feasible and reasonable at nearest existing non-associated residences.	The Construction IEA conducted by J2M Systems in 2018 states this condition seemed to be managed during construction.	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		There have been no official noise complaints recorded regarding generation of corona and aeolian noise from overhead transmission lines.			
HAZARDS AND RISK					
C11	Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with: (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997). In the event of an inconsistency between the requirements listed from (a) to (c) above, the most stringent requirement shall prevail to the extent of the inconsistency.	Substances are centrally stored and sheltered. Policies and Procedures appear well constructed and executed. Site visit on 13/02/2025 incorporated viewing the chemical storage policies, procedures and facilities, SDS sheets, see Appendix B Photo Reference 1. GE have a ChemCERT membership which allows them easy access to SDS's etc.	Considered compliant	C	-
Aviation Obstacles and Hazards					
C12	Prior to the commencement of construction, the Proponent shall consult with: (a) aerodrome operators that have an aerodrome located within 30 kilometres of the boundaries of the site, to determine any impact on Obstacle Limitation Surfaces at such aerodromes; (b) AirServices Australia, to determine potential impacts on instrument approach procedures at aerodromes, navigational aids, communications and surveillance facilities; and (c) Aerial Agriculture Association Australia, to determine potential hazards to aerial application and related operations. Feasible and reasonable mitigation measures for each of the potential impacts and hazards identified, shall be determined in consultation with the respective groups identified in this condition, prior to the commencement of construction.	The Construction IEA conducted by J2M Systems in 2018 states this condition seemed to be managed during construction: <i>A register of correspondence and consultation with regard to aviation hazards and obstacles has been established and maintained by Infigen (sighted). Consulted (or advised) parties include:</i> <ul style="list-style-type: none"> • Bodangora Airport • AirServices Australia • Aerial Agricultural Association Australia • Civil Aviation Safety Authority • Royal Australia Air Force (RAAF) • Wellington Aero Club Inc. This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit.	Not triggered	NT	-
C13	Prior to the commencement of construction, the Proponent shall provide the following information to the Civil Aviation Safety Authority, Airservices Australia, Royal Australian Air Force - Aeronautical Information Services, the Aerial Agricultural Association of Australia, as well as all known users of privately owned local airfields: (a) coordinates in latitude and longitude of each wind turbine generator; (b) final height of each wind turbine generator in Australian Height Datum; and (c) ground level at the base of each wind turbine generator in Australian Height Datum.	This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not triggered	NT	-
C14	Should increases to the costs of aerial agricultural spraying on any non-associated property surrounding the site be attributable to the operation of the Project, the Proponent shall fully fund to the affected landowner, the reasonable cost difference between pre-construction aerial agricultural spraying and the increased cost, as agreed between the relevant parties.	No increase to the costs of aerial spraying on surrounding properties has been reported.	Not triggered	NT	-
Radio Communication					
C15	Prior to the commencement of construction, the Proponent shall: (a) consult with the NSW Government Telecommunications Authority and other registered communications licensees (including emergency services) to ensure that risks to these services are minimised as far as feasible and reasonable. This may include the installation of additional radio sites or services to ensure coverage of radio communications are not degraded; (b) in the event that any disruptions to radio communication service links (installed before construction of the Project) arise as a result of the Project, the Proponent shall undertake appropriate remedial measures in consultation with the NSW Government Telecommunications Authority and relevant licensee to rectify any issue, including arranging the deployment of temporary measures in order to maintain effective coverage whilst more permanent measures are effected, within three months of the problem being identified, and at the expense of the Proponent; (c) consider remedial measures, including: <ul style="list-style-type: none"> i. modification to or relocation of the existing antennae; ii. installation and maintenance of additional radio sites or services; iii. installation of a directional antennae; and / or iv. installation of an amplifier to boost the signal strength. 	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not triggered	NT	-
Bushfire Risk					
C16	The Proponent shall ensure that all Project components on site are designed, constructed and operated to minimise ignition risks, provide for asset protection consistent with relevant RFS design guidelines (<i>Planning for Bushfire Protection 2006</i> and <i>Standards for Asset Protection</i>) and provide for necessary emergency management including appropriate fire-fighting equipment and water supplies on site to respond to a bush fire.	The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition in regard to construction of the project. BWF is located in a dry rural area which is designated bush fire prone land. Bushfire Risk is something BWF takes very seriously as evidenced by their commitment to reducing the risk of bushfire and to enable appropriate response in the case of fire as evidenced by a multi layered bushfire management system.	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		<p>Evidence includes:</p> <ul style="list-style-type: none"> OEMP Bushfire Management Sub Plan Fire Management Plan for Bodangora Wind Farm, developed by Australian Bushfire Protection Planners Pty Ltd 28/04/2021 Site inspection 2025 where maintenance schedules and management systems including 'Smartsheet', 'Risk wizard' 'Jira' and 'Gensuite' which are set with reminders to carry out regular consultation, drills, inspections etc. and have capacity to report results, hazards, incidents etc. BWF is in the process of transitioning to OneHS as the reporting platform for all HSE related items. This will include Audits, Incident reporting, Hazards etc. By next audit this would have effectively replaced the JIRA platform currently used. Evidence of use of Indji Watch. This platform provides live information on fires, lightning, high winds, temperature warnings, flooding via both email and text messages and webpage. BWF Owners Representative regularly (usually September) consults with RFS and is a member of the local brigade BWF Owners Representative is also a member of the Orana Bush Fire Management Committee. This committee meets quarterly at Dubbo RFS headquarters with agencies such as the RFS, DRC, NSW Police, Ambulance, SES, Essential Energy etc. Visitor Induction to BWF which covers what to do in case of bushfire <p>Bushfire prevention and management measures employed by BWF include:</p> <ul style="list-style-type: none"> Fire extinguishers in vehicles, throughout O&M building etc Electrical tools tagged and tested monthly Lightning protection measures adopted Diesel cars, regularly maintained Safe storage of Hazardous chemical and dangerous goods RFS website checked twice daily during fire season Iberdrola Operations Control Centre (24/7) monitors the daily Fire Danger Ratings for the area and any fires nearby site and notifies the Owners Representative as per the Notification Protocol. Effective liaison with emergency services established Liaison, regular drills, and regular fire prevention inspections by the Rural Fire Service and implementation of any recommendations, occurring annually in Aug/Sept. Mobile water tank plus water storage tanks on site (see Photo Reference 2, Appendix B) Regular maintenance of vegetation growth around intrastate and facilities. BWF tractor and slasher sighted, weed spraying occurring regularly. 			
C17	Throughout the operational life of the Project, the Proponent shall regularly consult with the local RFS about details of the Project, including the construction timetable and the final location of all infrastructure on the site. The Proponent shall comply with any reasonable request of the local RFS to reduce the risk of bushfire and to enable fast access in emergencies.	<p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition in regard to construction of the project.</p> <p>See evidence listed in Condition C16 above including regular consultation with local RFS.</p> <p>BWF bushfire readiness and commitment to collaboration with RFS has been demonstrated by its involvement in two local fires:</p> <ul style="list-style-type: none"> 14/11/2023 – Grass fire on western side of Mount Bodangora and approximately 1km south of BWF Substation. Cause of fire was from a lightning strike to a tree. Total area burnt would be approximately 20ha. Once alerted to the fire the BWF Owners Representative was in constant contact with the RFS fire ground controller and attended the area at the substation with the water trailer though it was not needed. The BWF Owners Representative assisted with directing assets to the fire ground via the BWF network of access tracks. In addition, BWF was called upon to turn off turbines to allow an aerial attack on the fire, which they complied with. A potentially catastrophic fire was averted and effective communication with RFS was carried out through the emergency. 27/12/2024 a small grass fire burnt an area on less than a hectare adjacent to Turbine 15. The cause of the fire was from a tree branch falling on to Essential Energy's distribution powerlines. BWF was advised of the fire by a local landholder and attended immediately. The RFS also attended and collaborated to extinguish the fire. BWF was also in contact with Essential Energy and able to direct them to the downed line. 	Considered compliant	C	-
VISUAL AMENITY					
Views					
C18	All non-associated receptor's whose dwelling may be subject to moderate to high visual impact, as defined in the EA, shall be consulted regarding impact minimisation measures. The outcomes of this consultation process shall be used to inform the Design and Landscape Plan, required under condition C26.	<p>This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit.</p> <p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.</p>	Not triggered	NT	-
C19	At the request of any owners of non-associated residential dwellings with views of a turbine(s) located within five kilometres of their dwellings, the Proponent shall provide and bear the full cost of reasonable landscaping treatments to visually screen these dwellings.	The approved Design and Landscaping Plan prepared by Moir Landscape Architecture 17/5/2018 (available on the BWF website) was reviewed (see also Condition C26). As per Section 3 of this Plan: Development & Design Measures for Visual Impact Mitigation:	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	Such a request may be made in writing by the owner of the dwelling within six months from the commencement of operation of the Project, and landscaping treatments agreed between the parties shall be implemented and completed within 12 months of such an agreement. Should the parties not be able to reach agreement on the scope of landscaping treatments, then either party may refer the matter to the Secretary for resolution. The Secretary's decision on such a referral shall be final and binding on the parties.	<p><i>The landowner may negotiate to install the landscape themselves at an agreed cost. If the landholder chooses to install the landscape then BWFPL is released from all future obligations relating to maintenance and monitoring.</i></p> <p>The BWF Owners Representative reports that letters were sent to all relevant owners of non-associated residential dwellings offering landscape treatments. Multiple landholders took up the offer. However, due to the severe drought at the time (2016-2020) the idea was physical planting was abandoned due to the high risk of failure. Instead, an agreement was made with the landowners to be paid to undertake the landscape treatments themselves once climate conditions allowed. All relevant landowners have been compensated, and the matter is considered closed.</p> <p>This is consistent with the approved Design and Landscaping Plan (refer item 4 in the table on page 9). The plan includes the option for the landowners to do it themselves at an agreed cost. The landscape plan was approved, hence, no need for separate email or letter from DPE on this matter.</p> <p>Landholders were appropriately compensated. As it was a commercial matter with each of the landowners no further details as to payments were provided. The auditor assumes this has occurred, BWF is dedicated to maintaining a positive and amicable relationship with landholders.</p>			
C20	Landscaping works to reduce the visual impact of the Project shall generally comprise of indigenous and locally occurring species.	<p>As per Condition C19 agreements were made with the landowners wanting visual screens to be paid to undertake the landscape treatments themselves once climate conditions allowed. All relevant landowners have been compensated, and the matter is considered closed.</p> <p>The Design and Landscaping Plan prepared by Moir Landscape Architecture 17/5/2018 was reviewed in the 2022 audit. Section 5 of this plan includes a schedule of suitable screen plant species which locally occurring species appropriate for screen planting. The list of pasture planting species for soil stabilization has four native species but also three introduced species. This list of species is only recommended for pasture planting in areas where existing vegetation has been cleared.</p> <p>Bodangora Windfarm Revegetation Monitoring Report – third site visit, Niche Environment and Heritage 18/03/2021 shows only areas which have previously been completely cleared being rehabilitated by direct seeding of exotic pasture grasses. This does not necessarily relate to Visual Amenity but it is however in accordance with the Design and Landscaping Plan.</p>	Considered compliant	C	-
Turbine and Associated Infrastructure External Design					
C21	The Proponent shall maximise the use of building materials and treatments for associated infrastructure which visually complement the surrounding environment.	<p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.</p> <p>The Design and Landscaping Plan prepared by Moir Landscape Architecture 17/5/2018 was reviewed in this audit. This plan shows how this condition has been managed for example:</p> <ul style="list-style-type: none"> The substation is located out of view from residences and public roads Substation buildings and other buildings are single story and in keeping with the rural vernacular. External finish is Colorbond Surf Mist. Buildings are of height, bulk and scale consistent with typical farm buildings. Material and colour is low contrast to surrounding landscape. <p>Site inspection on 13/02/2025 confirmed infrastructure has been constructed as per Design and Landscaping Plan.</p>	Considered compliant	C	-
C22	The turbines shall be painted off-white / grey. The blades shall be finished with a surface treatment that minimises any potential for glare or reflection. No advertising, signs or logos shall be mounted on the turbines, except where required for safety purposes.	Upon visual inspection the turbines appear painted in off-white/grey which is non-reflective. The auditor did not see advertising, signs or logos mounted on turbines.	Considered compliant	C	-
Shadow Flicker					
C23	Shadow flicker from the Project must not exceed 30 hours / annum at any residence not associated with the Project.	<p>The BWF Owners Representative confirmed there is no shadow flicker occurring at non-associated residence exceeding the defined limit.</p> <p>No complaints have been received regarding shadow flicker.</p>	Considered compliant	C	-
Substation					
C24	The substation and associated facility site shall be designed and constructed to minimise visual intrusion to the nearest sensitive receivers as far as feasible and reasonable including appropriate external finishes to minimise glare or reflection, landscape planting to screen views and external lighting requirements in accordance with Condition C25.	<p>This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit.</p> <p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.</p>	Not triggered	NT	-
Night Lighting					
C25	<p>With the exception of aviation hazard lighting implemented in accordance with the requirements of this condition, no external lighting other than low intensity security night lighting is permitted on site unless otherwise agreed or directed by the Secretary, or required by Civil Aviation Safety Authority.</p> <p>Prior to the commencement of construction, the Proponent shall consult with the Civil Aviation Safety Authority on the need for aviation hazard lighting in relation to the wind turbines. Any aviation hazard lighting shall be implemented in a manner that minimises</p>	<p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.</p> <p>The Design and Landscaping Plan shows how this condition has been managed:</p> <ul style="list-style-type: none"> No aviation lighting is required Only low intensity security lighting and personnel lighting is required at substation and buildings. <p>Site survey and meeting confirmed no external lighting other than occasional low intensity security night lighting.</p> <p>No official complaints have been received regarding the aviation hazard lighting or night lighting.</p>	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	visual intrusion to surrounding non-associated residences as far as feasible and reasonable.				
Design and Landscape Plan					
C26	<p>A Design and Landscaping Plan shall be prepared to outline measures to ensure appropriate development and maintenance of landscaping on the site to achieve adequate landscape buffers and address the visual impacts arising from the Project, including turbines, site access roads and associated above ground infrastructure, as far as is feasible and reasonable.</p> <p>The Plan shall be prepared by a qualified landscape architect and where relevant meet any requirements of Council. The Plan shall include design treatments for the turbines and ancillary infrastructure, including, but not necessarily limited to:</p> <ul style="list-style-type: none"> (a) the landscape screening measures at non-associated residences in close proximity to the Project site and along nearby roadsides to screen potential moderate to significant views of the Project, including an outline of additional measures available for requested landscaping treatments; (b) landscape elements and built elements, including proposed treatments, finishes and materials of exposed surfaces (including colour specifications); (c) lighting; (d) a schedule of species to be used in landscaping; (e) details of the timing and progressive implementation of landscape works; and (f) procedures and methods to monitor and maintain landscaped areas. <p>The Plan shall be submitted for the approval of the Secretary prior to the commencement of permanent built works and / or landscaping, unless otherwise agreed by the Secretary. The Plan may be submitted in stages to suit the staged construction program of the Project.</p>	<p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition however the proponent was still awaiting approval of the plan at that time.</p> <p>The Design and Landscaping Plan prepared by Moir Landscape Architecture 17/5/2018 was reviewed in this audit which is available on the proponent's website. The landscaping plan outlines and meets all the relative conditions of consent.</p> <p>A letter from Steve O'Donoghue as nominee of the Secretary dated 06/09/2018 approving this plan was sighted.</p>	Considered compliant	C	-
UTILITIES AND SERVICES					
C27	Utilities, services and other infrastructure potentially affected by construction and operation shall be identified prior to construction to determine requirements for access to, diversion, protection, and / or support. Consultation with the relevant owner and / or provider of services that are likely to be affected by the Project shall be undertaken to make suitable arrangements for access to, diversion, protection, and / or support of the affected infrastructure as required. The cost of any such arrangements shall be borne by the Proponent.	<p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.</p> <p>No new utilities, services and other infrastructure have potentially been affected by operation.</p>	Not triggered	NT	-
WASTE MANAGEMENT					
C28	The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> , if such a licence is required in relation to that waste.	<p>Iberdrola Owners Representative reported that no waste has been, or is planned to be, received on site.</p> <p>No outside waste was identified during site inspection.</p>	Considered compliant	C	-
C29	The Proponent shall maximise the reuse and / or recycling of waste materials generated on site by the Project, to minimise the need for treatment or disposal of those materials outside the site.	<p>The Construction IEA conducted by J2M Systems in 2018 considered the proponent compliant with this condition during construction.</p> <p>Minimal waste materials are generated during operation. Evidence of reuse and recycling of waste materials was sighted during site visit on 13/02/2025 (See photo Reference 3 Appendix B). The onsite septic system is regularly pumped out and waste removed from site.</p> <p>Waste minimisation strategies are outlined in both the BWF Operational Environmental Management Plan and the GE Environmental Management Plan. The waste register was sighted during site visit in February 2025.</p>	Considered compliant	C	-
C30	The Proponent shall ensure that no green waste associated with the Project is burnt on site during the life of the Project.	Iberdrola Owners Representative reported no burning of green waste is allowed on site.	Considered compliant	C	-
C31	The Proponent shall ensure that all liquid and / or non-liquid waste generated on the site is assessed and classified in accordance with Waste Classification Guidelines (DECC, 2008), or any future guideline that may supersede that document, and where removed from the site is only directed to a waste management facility lawfully permitted to accept the materials.	<p>The Construction IEA conducted by J2M Systems in 2018 stated there was an opportunity for improvement regarding this condition.</p> <p><i>'The register tracking waste removal off site could be improved by capturing the type, volume and disposal location. Record (receipt) of disposal at licensed facilities could also be maintained.'</i></p> <p>Site visit on 13/02/2025 confirmed the waste register managed by GE via 'Smartsheet' has subsequently been updated as per recommendation and is currently in use and up to date.</p>	Considered compliant	C	-
PROPERTY IMPACTS					
Crown Land					
C32	Prior to the commencement of construction of the Project, the Proponent shall consult with and comply with the requirements of the CL&W in relation to any Crown land affected by the Project to enable the lawful use of that land by the Project.	<p>This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit.</p> <p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.</p>	Not triggered	NT	-
C33	Prior to the commencement of construction of the Project, the Proponent shall, with the agreement of Council, assume full maintenance responsibility for any Crown road	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit.	Not triggered	NT	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	reserves associated with the Project which are identified as requiring dedication to Council during the life of the Project. The Proponent shall retain full maintenance responsibility for any such road(s) for the duration of their dedication to Council during the life of the Project.	The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.			
Trigonometric Reserves					
C34	Disturbance to Trigonometric Reserves shall be avoided during the life of the Project, unless otherwise approved by the Surveyor General and the relevant licence under the <i>Crown Lands Act 1989</i> is obtained by the Proponent.	No Trigonometric Reserves have been impacted.	Considered compliant	C	-
Mineral Resources					
C35	Prior to the commencement of relevant construction works, the Proponent shall consult with the Division of Resources & Geoscience and holders of mineral, mining and exploration titles or tenements, with respect to measures to be applied during construction and operation of the Project so as to minimise the potential for any sterilisation of resources on the tenement.	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not triggered	NT	-
SCHEDULE D – COMMUNITY INFORMATION, REPORTING AND AUDITING					
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT					
Community Consultative Committee					
D1	From the commencement of construction, the Proponent must operate a CCC for the Project to the satisfaction of the Secretary, in accordance with the Community Consultative Committee Guidelines for State Significant Projects (2016) or its latest version.	The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition during construction. Consultation with the CCC independent Chairperson, Ian Rogers, in February 2025 (see Appendix C) who stated: <i>I have chaired the Bodangora Wind Farm CCC since late 2015 and continue to do so. During that time Infigen Energy and now Iberdrola have both been highly effective in supporting the functioning of the CCC in accordance with the Community Consultative Committee Guidelines.</i> The CCC Annual Report for 2024 is not yet available, however all past meeting minutes and Annual reports are available on the BWF website.	Considered compliant	C	-
Complaints and Enquiries Procedure					
D2	Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall ensure that the following are available for community enquiries and complaints for the life of the Project (including construction and operation) or as otherwise agreed by the Secretary: (a) a 24 hour telephone number(s) on which complaints and enquiries about the Project may be registered; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a complaints management and mediation system for complaints unable to be resolved. The telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the commencement of construction and prior to the commencement of operation. This information shall also be provided on the website (or dedicated pages) required by this Approval.	The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition during construction. The Iberdrola website currently outlines contact details for feedback or complaints as well as the company's <i>Community and Stakeholder Engagement Policy, Complaints Handling Standard, Whistleblower Policy and Retail Customer Complaints Handling Standard.</i>	Considered compliant	C	-
D3	Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement a Complaints Management System consistent with AS 4269: <i>Complaints Handling</i> and maintain the System for the life of the Project. Information on all complaints received, including the means by which they were addressed and whether resolution was reached, with or without mediation, shall be maintained in a complaints register and included in the construction compliance reports required by this Approval. The information contained within the System shall be made available to the Secretary on request.	As per the 2018 audit, JIRA is still currently system used to track incidents, complaints etc. JIRA captures details such as date, time, person details, nature of incident etc. The system was witnessed in action during site visit on 13/02/2025 and contains for example: <ul style="list-style-type: none"> reports of farmers stock out carcasses found person ringing complaint hotline to see if it works road repairs required. Complaints recorded on JIRA during previous audit in 2018 could still be reviewed and were all resolved. BWF is in the process of transitioning to OneHS as the reporting platform for all HSE related items. This will include Audits, Incident reporting, Hazards etc. By next audit this would have effectively replaced the JIRA platform currently used. No complaints to the EPA have been reported in the audit period. The proponent welcomes feedback and acts on all complaints swiftly and seriously.	Considered compliant	C	-
Provision of Electronic Information					
D4	Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the Project, for the life of the Project. The Proponent shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to: (a) information on the current implementation status of the Project;	The Bodangora Wind Farm website is active and can be readily accessed: https://www.infigenenergy.com/our-assets/owned-renewable-energy-assets/bodangora/ Project approval and modifications documents are not available directly on the Bodangora Wind Farm website, but a link is available which connects directly to the approval documents on the NSW Planning Portal.	Considered compliant Recommendation: Updates documents overdue for annual review. Consider revising internal review process to occur in a	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	(b) a copy of the documents referred to under condition B1 of this Approval, and any documentation supporting modifications to this Approval that may be granted; (c) a copy of this Approval and any future modification to this Approval; (d) a copy of each relevant environmental approval / consent, licence or permit required and obtained in relation to the Project; (e) a copy of each current strategy, plan, program or other document required under this Approval; (f) the outcomes of compliance tracking in accordance with condition D5 of this Approval; and (g) details of contact point(s) to which community complaints and enquiries may be directed, including a telephone number, a postal address and an email address.	EPL license needs old version (2019) removed from website (new 2020 version is already available) Considered compliant Recommendation: Some documents are overdue for annual review: <ul style="list-style-type: none"> Compliance Tracking Program overdue for annual review Pollution Incident Response Management Plan overdue for annual review (also update Table 3.3 re: completion of 2018 audit, and page 10 change reference from CEMP to OEMP) OEMP overdue for annual review Noting that this is the proponent's internal requirement, and the annual reviews need to occur for the documents to be consistent with themselves. BWF Owners Representative reports the annual reviews are currently going through the internal review process. Consider revising internal review process to occur in a timelier fashion or reassess review timetable.	timelier fashion or reassess review timetable.		
COMPLIANCE MONITORING AND TRACKING					
Compliance Tracking Program					
D5	The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this Approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the life of the Project. The Program shall include, but not necessarily be limited to: <ul style="list-style-type: none"> (a) provisions for the notification of the Secretary prior to the commencement of construction and prior to the commencement of operation of the Project (including prior to each stage, where works are being staged); (b) provisions for periodic review of the compliance status of the Project against the requirements of this Approval; (c) provisions for periodic reporting of compliance status to the Secretary, including a Pre-Construction Compliance Report, during construction reporting, and a Pre-Operation Compliance Report; (d) a program for independent environmental auditing in accordance with <i>ISO 19011:2003 - Guidelines for Quality and / or Environmental Management Systems Auditing</i>; (e) mechanisms for recording environmental incidents during construction, and actions taken in response to those incidents; (f) provisions for reporting environmental incidents to the Secretary and relevant public authorities (including Council) during construction and for the life of the Project; (g) procedures for rectifying any non-compliance identified during environmental auditing, and review of compliance or incident management; and (h) provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this Approval relevant to their respective activities. 	The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition and sighted the submission and approval letters for the Program. The Bodangora Wind Farm compliance tracking program available on the website. This document was reviewed in this 2022 audit. This program has been approved. Considered compliant Recommendation: This document needs updating regarding relevant dates and timing updated as well as change the reference to the superseded CEMP to current OEMP.	Considered compliant	C	-
Incident Notification					
D6	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Proponent becomes aware of the incident. The notification must identify the project (including the project application number and the name of the project if it has one), and set out the location and nature of the incident.	No incidents have been reported since the 2022 audit.	Not triggered	NT	-
Non-Compliance Notification					
D7	The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Proponent becomes aware of any non-compliance. The notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	No non-compliances have been reported since the 2022 audit.	Not triggered	NT	-
INDEPENDENT ENVIRONMENTAL AUDIT					
D8	Within 1 year of the commencement of construction, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. These audits must: <ul style="list-style-type: none"> (a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) be carried out in consultation with the relevant agencies; (c) assess whether the project complies with the relevant requirements in this approval and any strategy, plan or program required under this approval; and (d) recommend appropriate measures or actions to improve the environmental performance of the project, and any strategy, plan or program required under this approval. 	The Construction IEA conducted by J2M Systems in 2018, the 2022 Audit undertaken by AREA and this audit meet this condition.	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
D9	Within 3 months of commencing an audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report and a timetable for the implementation of the recommendations.	The 2018 and 2022 audit and Audit action plans have been submitted to and approved by the Secretary and are available on the BWF website.	Considered compliant	C	-
D10	The recommendations must be implemented to the satisfaction of the Secretary.	The 2022 audit considered the proponent was compliant with this condition for the 2018 audit. The 2022 audit and audit action plan were submitted to the Secretary on 9 March 2022, the reply below was received on 30/03/2022: <i>The Department considers the IEA report to generally satisfy the reporting requirements of the consent/approval. The 1 (one) non-compliance identified in the IEA in relation to Condition F5, i.e a lack of consultation with relevant agencies, has been assessed in accordance with the Department's Compliance Policy and on this occasion, determining to record the breach with no further enforcement action. However, please note that recording the breach does not preclude the Department from taking alternative enforcement action, should it become apparent that an alternative response is more appropriate.</i>	Considered compliant	C	-
D11	Within 3 years of the commencement of the operation of the project, or within 3 months of the submission of an: (a) incident report under condition D6; (b) audit under condition D8; or (c) any modification to the conditions of this approval, the Proponent shall review, and if necessary revise, the strategies, plans and programs required under this approval to the satisfaction of the Secretary.	This 2025 audit meets this condition.	Considered compliant	C	-
SCHEDULE E – CONSTRUCTION ENVIRONMENTAL MANAGEMENT					
DUST GENERATION					
E1	The Project shall be constructed in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust and tracking of material onto public roads. All Project related activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, the Proponent shall identify and implement all feasible and reasonable dust mitigation measures, including cessation of relevant works as appropriate such that emissions of visible dust cease.	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not triggered	NT	-
HERITAGE					
E2	In undertaking the Project, impacts to heritage, shall to the greatest extent practicable, be avoided and minimised. In particular: (a) clearly identify and avoid the stone procurement artefact area (SU18/L1), and the Kaiser Mine, and include methods for restricting access to these sites as part of the Construction Heritage Management Plan required by condition E21(e); and (b) where impacts as assessed in the EA are unavoidable, works shall be undertaken in accordance with the strategy outlined in the Construction Heritage Management Plan required by condition E21(e).	The Construction IEA conducted by J2M Systems in 2018 reported this as a non-compliance due to accidental impact to the stone procurement artefact area (heritage site SU18/L1). Corrective actions were taken in response to the NSW DPE Penalty notice. This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. As per the 2022 audit, stone procurement artefact area (SU18/L1) remains adequately fenced and signed and the visitor induction clearly states this area has been fenced off and is not to be accessed. Kaiser Mine remains avoided by BWF, it has however been accessed by exploration drilling unrelated to the BWF operation see Appendix B Photo reference 4.	Considered compliant	C	-
E3	Clearly identify the level of construction vehicles required to use the Sandy Hollow to Maryvale Railway line, and the ability of the existing road to accommodate heavy vehicles. Should widening or other enhancements be required to safely accommodate heavy vehicles, a Statement of Heritage Impact is required in accordance with relevant Heritage Council guidelines, in consultation with the Heritage Branch of the OEH, and to the satisfaction of the Secretary.	The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition during construction. Currently the Operation Environmental Management Plan states: <i>Sections of the Sandy Hollow to Maryvale Railway are currently utilised as a farm road within the project area. The roadway was temporarily utilised for wind farm access during construction and may be used by light vehicles only during operation of the project.</i> The visitor induction undertaken during site visit in 13/02/2025 includes a section informing visitors about heritage sites and how to avoid them.	Considered compliant	C	-
NOISE AND VIBRATION					
Construction or Decommissioning Hours					
E4	The Proponent shall only undertake construction or decommissioning activities between: (a) 7:00am to 6:00pm Mondays to Fridays; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or NSW public holidays. The following construction activities may be undertaken outside these hours: • activities that are inaudible at any non-associated residence; • activities approved under an out-of-hours (OOHW) work protocol (see condition E21(b)(vi)); • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not triggered	NT	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance											
	<ul style="list-style-type: none">emergency work to avoid the loss of lives, property and/or prevent environmental harm.															
E5	Deleted	-	-	-	-											
E6	Deleted	-	-	-	-											
Construction Noise and Vibration																
E7	The Proponent shall only carry out blasting on site between 9am and 5pm Monday to Friday and 9am to 1pm Saturday. No blasting is allowed on Sundays or NSW public holidays.	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not Triggered	NT	-											
E8	<div>The Proponent shall ensure that any blasting carried out during construction of the project does not exceed the criteria in Table 1.</div> <div>Table 1 – Blasting criteria<table><tr><th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr><tr><td rowspan="2">Residence on privately-owned land</td><td>120</td><td>10</td><td>0%</td></tr><tr><td>115</td><td>5</td><td>5% of total number of blasts over a 12 month period</td></tr></table></div>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Residence on privately-owned land	120	10	0%	115	5	5% of total number of blasts over a 12 month period	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not Triggered	NT	-
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance													
Residence on privately-owned land	120	10	0%													
	115	5	5% of total number of blasts over a 12 month period													
E9	Deleted	-	-	-	-											
E10	Deleted	-	-	-	-											
PROPERTY IMPACTS																
E11	Access to private property shall be maintained during construction unless otherwise agreed with the affected property owner in advance. Access that is physically affected by the Project shall be reinstated by the Proponent to at least an equivalent standard, in consultation with the affected property owner.	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not Triggered	NT	-											
E12	Any damage caused to property as a result of the Project shall be rectified or the property owner compensated, within a reasonable timeframe, with the costs borne by the Proponent.	This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition.	Not Triggered	NT	-											
SOIL, WATER QUALITY AND HYDROLOGY																
E13	The Proponent must: (a) 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 <i>Managing Urban Stormwater - Soils and Construction Volume 1</i> (Landcom, 2004) and <i>Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads</i> (DECC, 2008), or their latest versions, to minimise erosion and control sediment generation;	<div>The Construction IEA conducted by J2M Systems in 2018 states the proponent was non-compliant with this condition. This has since been actioned and was considered compliant in 2022.</div> <div>The following evidence was viewed:<ul style="list-style-type: none">Bodangora Windfarm Revegetation Monitoring Report – third site visit, Niche Environment and Heritage 18/03/2021Bodangora Wind Farm End of Warranty Inspections - DNV GL Energy 18/03/2021OEMP – subsection Operation Soil and Water Management Sub Planaerial imagerysite visit.</div> <div>The Niche revegetation monitoring concluded that areas requiring rehabilitation overall had become ‘well-established, in good health and self-sustaining’ (see Condition F6) and stated: <i>Due to significant rains prior to the follow up assessment and on-going management actions by CATCON, all areas are now considered to have met the performance criteria and can therefore said to be compliant.</i></div> <div>The combination of cessation of construction, adequate rainfall and appropriate drainage and erosion and sediment controls have satisfactorily minimised erosion and sediment generation across the project area.</div> <div>Since the 2022 audit, 21 items relating to access Tracks, Drainage and Hardstands have undergone warranty repairs by CATCON. Erosion and sediment controls have evidently been employed across the site, see Photo reference 5, Appendix B, as per recommendations such as:<ul style="list-style-type: none">Rock placement (riprap)Drain constructionGeofabricCulvertsContouringDirect seedingSediment controls (eg hay)</div>	Considered compliant	C	-											

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		The OEMP also outlines mitigation strategies and monitoring and reporting requirements in relation to ongoing soil and water management to minimise erosion and control sediment generation.			
	(b) ensure all waterway crossings are constructed in accordance with the: <ul style="list-style-type: none"> Water Guidelines for Controlled Activities on Waterfront Land (2012), or its latest version; and Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version; 	As per Condition C9 the Construction IEA conducted by J2M Systems in 2018 stated: <i>Email from NSW DPI dated 14/11/2017 regarding Spicers Creek crossing. Email outlines approved under Condition C9 and E15 (deleted), which required DPI consultation. Controlled activity license is not required as it is within the proposed construction areas. Gillinghall Road culverts not modified.</i> The 2022 audit considered the proponent compliant with this condition and concluded the proponent is committed to effective management, rehabilitation and maintenance, See also Condition E13(a) and F6. This current audit relates to operation of the project, Conditions related to construction have not been fully explored as they are not relevant to this audit. Drainage line crossings sighted during site visit in February 2025 appeared to be adequately constructed and managed by pipe culverts with rock fill and there were no obvious areas of erosion or sedimentation Considered compliant.	Considered compliant.	C	-
	(c) store and handle all dangerous or hazardous materials on site in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version; (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.	As per Condition C11 site visit on 13/02/2025 incorporated viewing the chemical storage policies, procedures and facilities, SDS sheets, see Appendix B Photo Reference 1. Hazardous and dangerous substances are centrally stored and sheltered and suitable bunded. Policies and Procedures appear well constructed and executed. BWF is evidently committed to health, safety and environment.	Considered compliant	C	-
E14	Deleted	-	-	-	-
E15	Deleted	-	-	-	-
TRAFFIC AND TRANSPORT					
E16	Unless otherwise agreed by the Secretary, the Proponent shall commission an independent, qualified person or team to undertake the following in consultation with the relevant road authority: (a) prior to the commencement of construction, review the proposed route and existing access provisions to the Wind Farm site to determine whether the route and existing provisions allow for safe access of construction and operational vehicles associated with the Project (including appropriate site distances, [specifically at the intersection of Goolma Road and Gillinghall Road], appropriate setback of gate[s] at property entry and exit location[s] to ensure safety for other road users and provisions for over-mass or over-dimensional transport and safety with other road users). Where improvements or changes to the proposed route are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of construction and at the full expense of the Proponent; and (b) assess all roads proposed to be used for over-mass and / or over-dimensional transport (including intersections, bridges, culverts and other road features) prior to the commencement of construction to determine whether the existing road condition can accommodate the proposed over-mass and / or over-dimensional haulage. Where improvements are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of construction and at the full expense of the Proponent. Upon determining the haulage route(s) for construction vehicles associated with the Project, and prior to construction, undertake a Road Dilapidation Report . The Report shall assess the current condition of the road(s) and describe mechanisms to restore any damage that may result due to traffic and transport related to the construction of the Project. The Report shall be submitted to the relevant road authority for review prior to the commencement of haulage. Within three months of completion of construction, a subsequent Report shall be prepared to assess any damage that may have resulted from the construction of the Project (including mechanisms to restore any damage) and submitted to relevant road authority for review. Measures undertaken to restore or reinstate roads affected by the Project shall be undertaken in accordance with the reasonable requirements of the relevant road authority (including timing requirements), and at the full expense of the Proponent.	The Construction IEA conducted by J2M Systems in 2018 states the proponent was non-compliant with this condition however works to address this non-compliance were complete by the end of the audit. The Off-Site post-Construction Dilapidation Report prepared by CATCON for BWF dated 31/01/2019 was viewed. Correspondence with Peter James from Dubbo Regional Council on 21/5/2019 was also viewed which stated: <i>I have reviewed the Post-Construction Dilapidation Road Report for the Bodangora Wind farm that you have provided and agree that all items required in the construction phase of the Voluntary Planning Agreement (between CATCON and Dubbo Regional Council) have been satisfactorily closed out.</i> The intersection of Gillinghall and Goolma was viewed during site visit 13/02/2025. The intersection appears safe, well signposted and maintained.	Considered compliant	C	-
ANCILLARY FACILITIES					
E17	Unless otherwise approved by the Secretary, the location of Ancillary Facilities shall: (a) be located more than 50 metres from a waterway; (b) be located within or adjacent to the Project; (c) have ready access to the road network; (d) be located to minimise the need for heavy vehicles to travel through residential areas;	This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit. The Construction IEA conducted by J2M Systems in 2018 stated there was opportunity for improvement regarding this Condition:	Not triggered	NT	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	<p>(e) be sited on relatively level land;</p> <p>(f) be separated from nearest residences by at least 200 metres;</p> <p>(g) not require vegetation clearing beyond that already required by the Project;</p> <p>(h) not impact on heritage sites (including areas of archaeological sensitivity) beyond those already impacted by the Project;</p> <p>(i) not unreasonably affect the land use of adjacent properties;</p> <p>(j) be above the 20 ARI flood level unless a contingency plan to manage flooding is prepared and implemented; and</p> <p>(k) provide sufficient area for the storage of raw materials to minimise, to the greatest extent practical, the number of deliveries required outside standard construction hours.</p> <p>The location of the Ancillary Facilities shall be identified in the Construction Environmental Management Plan required under condition E20 and include consideration of the above criteria. Where the above criteria cannot be met for any proposed Ancillary Facility, the Proponent shall demonstrate to the satisfaction of the Secretary that there will be no significant adverse impact from that facility's construction or operation. Such assessment(s) can be submitted separately or as part of the Construction Environmental Management Plan.</p>	<p><i>The approved Ancillary Facilities Management Plan (005 and 006) are to be included in the revised CEMP post approval by NSW DPE.</i></p> <p>Since the project moved from construction to operation the CEMP has been replaced by the OEMP. This condition is believed to have been managed, see Condition D9 and D10.</p>			
E18	All construction ancillary facility sites shall be rehabilitated to at least their pre-construction condition, unless otherwise agreed by the affected landowner.	<p>Bodangora Windfarm Revegetation Monitoring Report – third (and final) site visit, Niche Environment and Heritage 18/03/2021 concluded that areas requiring rehabilitation overall had become 'well-established, in good health and self-sustaining' (see Condition F6).</p> <p>The BWF Owners Representative reports that agreements with landholders varied, and some ancillary facilities do not need to be rehabilitated as the land holders wished to take ownership of them such as gravel piles and fences. In particular the construction compound next to the O&M still has fencing and gravel piles present at the landowner's request. These findings are consistent with the findings of the site visits by AREA in 2022 and 2025.</p> <p>Review of aerial photography shows the state of rehabilitation over time with areas that were heavily disturbed during construction now rehabilitated to pre-construction condition (see photo references 6 and 7, Appendix B, except for access roads and blade laydown areas which will remain unrehabilitated for the life of the project.</p> <p>A letter from the Planning Department dated 08/06/2022 was viewed which states the department had reviewed the Niche Revegetation Monitoring Report and:</p> <p><i>The department has carefully reviewed the report and notes that due to significant rain prior to the assessment and on-going management actions by CATCON, the disturbed areas shown in Figure 3 of the Report are now considered compliant with Condition F6 and no longer require monitoring as part of this condition. It is also noted that DPI Fisheries and Crown Lands have also reviewed the Report and are satisfied with the rehabilitation status.</i></p>	Considered compliant	C	-
ENVIRONMENTAL REPRESENTATIVE					
E19	<p>Prior to the commencement of construction of the Project, or as otherwise agreed by the Secretary, the Proponent shall nominate for the approval of the Secretary a suitably qualified and experienced Environment Representative(s) that is independent of the design and construction personnel. The Proponent shall employ the Environmental Representative(s) for the duration of construction and operation, or as otherwise agreed by the Secretary. The Environment Representative(s) shall:</p> <p>(a) be the principal point of advice in relation to the environmental performance of the Project;</p> <p>(b) monitor the implementation of environmental management plans and monitoring programs required under this Approval and advise the Proponent upon the achievement of these plans / programs;</p> <p>(c) have responsibility for considering and advising the Proponent on matters specified in the conditions of this Approval, and other licences and approvals related to the environmental performance and impacts of the Project;</p> <p>(d) ensure that environmental auditing is undertaken in accordance with the Proponent's Environmental Management System(s);</p> <p>(e) be given the authority to approve / reject minor amendments to the Construction Environment Management Plan. What constitutes a "minor" amendment shall be clearly explained in the Construction Environmental Management Plan required under condition E20;</p> <p>(f) be given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur; and</p> <p>(g) be consulted in responding to the community concerning the environmental performance of the Project where the resolution of points of conflict between the Proponent and the community is required.</p>	<p>A letter from Mike Young as the Secretary's nominee dated 14/12/2016 re: <i>Condition E19 – Environmental Representative</i> identifies Ms. Heather Tilley as the Environmental representative for the Bodangora Wind farm.</p> <p>This appointment remains unchanged and BWF has had no need to communicate or consult with their Environmental Representative during this audit period.</p>	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN					
Conditions E20 and E21 relate to the CEMP	These conditions relate to the Construction Environmental Management Plan which for the purposes of this audit have been superseded by the OEMP	This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit. The CEMP has been superseded by the OEMP which is discussed in Condition F19.	Not Triggered	NT	-
SCHEDULE F – OPERATION ENVIRONMENTAL MANAGEMENT					
HAZARD AND RISK					
Bushfire Risk					
F1	Throughout the operational life of the Project, the Proponent shall regularly consult with the RFS to ensure its familiarity with the Project. The Proponent shall comply with any reasonable request of the RFS to reduce the risk of bushfire and to enable fast access in emergencies.	<p>Evidence includes:</p> <ul style="list-style-type: none"> OEMP Bushfire Management Sub Plan Fire Management Plan for Bodangora Wind Farm, developed by Australian Bushfire Protection Planners Pty Ltd 28/04/2021 Site inspection 2025 where maintenance schedules and management systems including 'Smartsheet', 'Risk wizard' 'Jira' and 'Gensuite' which are set with reminders to carry out regular consultation, drills, inspections etc. and have capacity to report the results, incidents etc. BWF is in the process of transitioning to OneHS as the reporting platform for all HSE related items. This will include Audits, Incident reporting, Hazards etc. By next audit this would have effectively replaced the JIRA platform currently used. Visitor Induction to BWF which covers what to do in case of bushfire. <p>See Condition C16 and C17 for more information regarding BWF role in two local fires which demonstrated its readiness and commitment to collaboration in bushfire emergencies.</p>	Considered compliant	C	-
Safety Management System					
F2	<p>At least two months prior to the commencement of commissioning, the Proponent shall prepare a report outlining a comprehensive Safety Management System, covering all on-site systems relevant to ensuring the safe operation of the Project. The System shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records shall be kept at the site and shall be available for inspection by the Department upon request. The Safety Management System shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management', and should include:</p> <p>(a) procedures and programs for the maintenance and testing of the safety related equipment to ensure its integrity over the life of the Project; and</p> <p>(b) an outline of a documented procedure for the management of change.</p>	<p>GE's Bodangora Wind Farm Simplified Work Plan (SWP) document provides a summary of required EHS (Environment, Health and Safety) activities. The document was originally drafted in June 2018, prior to the commencement of commissioning, and has most recently been revised in March 2024. The purpose of the SWP is:</p> <p><i>Implementation of the Simplified Work Plan is necessary to maintain regulatory conformance, comply with of Department of Planning and Environment (DPE) and Environment Protection Authority conditions including the Environmental Protection License and Operational Environmental Management Plans, achieve EHS performance, and to meet GE Renewable Energy EHS management requirements.</i></p> <p>As per BWFs approved OEMP, Section 4.15:</p> <p><i>Iberdrola's integrated Health, Safety and Environment (HSE) Management System has been developed to establish and document a framework of requirements, policies, standards, guidelines and management practices for consistent and continuous improvement in health, safety and environmental performance and to ensure legal compliance. The HSE Management System is based on the requirements in:</i></p> <ul style="list-style-type: none"> Standard for Environmental Management Systems; and Standard for Occupational Health & Safety Management Systems. <p><i>The System is designed to meet legislative compliance and to align with recognized management system principles of Plan, Do, Check, Review.</i></p> <p>The BWF Emergency Response Plan, which is a sub-plan of Iberdrola's Work Health and Safety Management Plan, provides further details regarding safety considerations and the safety of personnel in the event of emergencies.</p> <p>Safety management at BWF is currently covered by the following policies and procedures:</p> <ul style="list-style-type: none"> Iberdrola Health, Safety and Environment Policy The BWF OEMP GE Environmental Management Plan GE High Voltage Electrical Safety Procedures GE Emergency Response Plan Other GE Forms, Procedures, Plans including: <ul style="list-style-type: none"> Corrective Action Register Hazardous Substances and Dangerous Goods Job Safety Analysis / Safe Work Method Statement Incident Investigation Incident Reporting Internal Audits Management Review Permits to Work Risk Assessment and Control 	Considered compliant	C	-



Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
		<ul style="list-style-type: none"> • JSA/SWMS • Incident Report Form • Hot Work Permit • Incident Reporting Communication Protocol • Vehicle Inspection Checklist • Hazard Observation Card • Site Induction and Personal Details • Safety Toolbox Meeting Minutes • Service Safety Inspection • Compliance Inspection – Environmental • GE Bodangora Wind Farm Plans and Documents • Bodangora Wind Farm – Service Management Plan • Bodangora Wind Farm – Emergency Response Plan • Service HSE Risk Register • Bodangora Wind Farm – Audit Schedule • Bodangora Wind Farm – Incident Register • Bodangora Wind Farm – Hazard Observation Register • Bodangora Wind Farm – Corrective Action Register • Bodangora Wind Farm – MSDS Register. <p>Site inspection 2025 showed a dedication to safety as evidenced in visitor induction, signage, notice boards, access to policy and procedures etc. See Photo Reference 8, Appendix B.</p> <p>Maintenance schedules and management systems including 'Smartsheet', 'Risk wizard' 'Jira' and 'Gensuite' which are set with reminders to carry out regular consultation, drills, inspections etc. and have capacity to report results, hazards, incidents etc. were also observed in action at BWF. BWF is in the process of transitioning to OneHS as the reporting platform for all HSE related items. This will include Audits, Incident reporting, Hazards etc. By next audit this would have effectively replaced the JIRA platform currently used.</p> <p>The Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management', was referred to during the 2025 audit.</p> <p>BWF is evidently committed to health, safety and environment. The Simplified Work Plan outlines a comprehensive Safety Management System, covering all on-site systems relevant to ensuring the safe operation of the Project which meets this Condition.</p> <p>BWF Owners Representative reports an independent auditor was engaged in late December 2024 to undertake an audit solely focused on GE's Simplified Work Plan. The results from this audit are yet to be provided to Iberdrola but this demonstrates Iberdrola's commitment to maintaining a comprehensive and effective Safety Management System.</p> <p>BWF has also created a 'Work Health and Safety Performance Standard for the Operations and Maintenance Provider' (WHSPSOMP December 2024) document which provides an overview of the systems and processes that are to be implemented at the wind farm to ensure that safety and technical standards are established and complied with.</p> <p>There are adequate on-site systems relevant to ensuring the safe operation of the Project.</p>			
Television and Radio Interference					
F3	Prior to the commencement of commissioning of the Project, the Proponent shall undertake an assessment of the existing quality of the television / radio transmission available at a representative sample of receivers located within five kilometres of any wind turbine.	<p>BWF Owners Representative stated this had occurred and potentially affected landholders were encouraged to contact the proponent if they experienced Television and Radio interference. Five landholders felt impacted and BWF provided new antennas for them. The proponent demonstrates a strong respect for and desire to work with surrounding landholders/receivers to ensure a positive working relationship</p> <p>No further complaints have been received.</p>	Considered compliant	C	-
F4	<p>In the event of a complaint from a receptor located within five kilometres of a wind turbine regarding television / radio transmission during the operation of the Project, the Proponent shall investigate the quality of transmission at the receptor compared with the pre-commissioning assessment and where any transmission problems can be reasonably attributable to the Project, rectify the problems within three months of the receipt of the complaint, through the implementation of measures including:</p> <p>(a) modification to or replacement of receiving antenna;</p> <p>(b) installation and maintenance of a parasitic antenna system;</p> <p>(c) provision of a land line between the affected receptor and an antenna located in an area of favourable reception; and / or</p> <p>(d) other feasible measures.</p> <p>If interference cannot be overcome by the measures outlined in (a) to (d), the Proponent shall negotiate with the impacted landowner(s) about installing and maintaining a satellite receiving antenna. The Proponent shall be responsible for all costs associated with any such mitigation measures.</p>	See previous Condition F3	Considered compliant	C	-

Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
REHABILITATION AND REVEGETATION					
F5	Disturbance to watercourses and / or associated riparian vegetation shall be rehabilitated to a standard equal to or better than the existing condition in consultation with the CL&W and DPI (Fisheries) within six months of the cessation of construction activities at the relevant area. Any revegetation measures undertaken shall be monitored and maintained consistent with the requirements of Condition F6.	<p>This was a non-compliance in the 2022 audit as there is no evidence of consultation with the CL&W (Crown Lands and Water) and DPI (Fisheries) within six months of the cessation of construction activities at the relevant areas as the proponent assumed this was covered by the requirements of Condition F6.</p> <p>As per recommendations following the 2022 audit, BWF contacted CL&W and DPI (Fisheries) regarding this Condition and provided a copy of the Niche Revegetation Monitoring Report. Correspondence was sited from both agencies from 2022 which confirmed they were happy with the report and its conclusions and neither required a site inspection.</p> <p>As part of this audit both CL&W and DPI (Fisheries) were consulted, see Section 3.8 of this report), DPI (now DPIRD) replied with the following on 05/02/2025:</p> <p><i>DPIRD Fisheries were consulted and asked to review the Bodangora Windfarm Revegetation Monitoring-Third Visit Report dated 18th March 2021 as per conditions F5 and F6 of the Development Consent to determine whether the department was satisfied with rehabilitation of areas of disturbance to watercourses and associated riparian vegetation and that revegetation measures had been undertaken consistent with these requirements.</i></p> <p><i>DPIRD Fisheries reviewed the independent report and responded that our department was satisfied with the revegetation rehabilitation adjacent to mapped hydrolines and Key Fish Habitat and were satisfied with the rehabilitation of disturbances adjacent to waterway crossings. Our department was satisfied that a site inspection by DPIRD Fisheries was not warranted.</i></p> <p><i>DPIRD Fisheries have no further requirements or concerns that need to be raised with regards this development and compliance with the development conditions.</i></p> <p>A reply from Crown Lands was received on 28/02/2025 reporting Crown Lands note compliance with Condition F5 and do not have any comment to add at this time.</p>	Considered compliant	C	-
F6	The Proponent shall implement a revegetation and rehabilitation programme for all areas of the Project footprint which are disturbed during the construction of the Project, which are not required for the ongoing operation of the Project, including temporary construction facility sites and sections of construction access roads. The Proponent shall ensure that all revegetation measures are implemented progressively where possible and in all cases within six months of the cessation of construction activities at the relevant area. Unless otherwise agreed to by the Secretary, the Proponent shall monitor and maintain the health of all revegetated areas until such time that the plantings have been verified by an independent and suitably qualified expert (whose appointment has been agreed to by the Secretary) as being well established, in good health and self sustaining.	<p>The revegetation and rehabilitation program is complete and has been verified by independent and suitably qualified experts from Niche Environment and Heritage (as agreed by the Secretary) Sighted letter from Steve O'Donoghue, as nominee of the Secretary, dated 6/9/18 re: Endorsement of Experts from Niche Environment and Heritage to undertake the verification if rehabilitation performance in accordance with this condition.</p> <p>Bodangora Windfarm Revegetation Monitoring Report – third (and final) site visit, Niche Environment and Heritage 18/03/2021 concluded that areas requiring rehabilitation overall had become 'well-established, in good health and self-sustaining' (see Condition F6).</p> <p>The BWF Owners Representative reports that agreements with landholders varied, and some ancillary facilities do not need to be rehabilitated as the land holders wished to take ownership of them such as gravel piles and fences. In particular the construction compound next to the O&M still has fencing and gravel piles present at the landowner's request. These findings are consistent with the findings of the site visits by AREA in 2022 and 2025.</p> <p>Review of aerial photography shows the state of rehabilitation over time with areas that were heavily disturbed during construction now rehabilitated to pre-construction condition (see photo references 6 and 7, Appendix B, except for access roads and blade laydown areas which will remain unrehabilitated for the life of the project.</p> <p>A letter from the Planning Department dated 08/06/2022 was viewed which states the department had reviewed the Niche Revegetation Monitoring Report and:</p> <p><i>The department has carefully reviewed the report and notes that due to significant rain prior to the assessment and on-going management actions by CATCON, the disturbed areas shown in Figure 3 of the Report are now considered compliant with Condition F6 and no longer require monitoring as part of this condition. It is also noted that DPI Fisheries and Crown Lands have also reviewed the Report and are satisfied with the rehabilitation status.</i></p>	Considered Compliant	C	-
NOISE					
Noise Verification Report					
F7	Prior to commissioning of the wind farm, the Proponent shall provide an updated prediction of wind farm noise levels at all non-associated residences or representative clusters of non-associated residences that will experience wind turbine noise greater than 35 dB(A) when turbines are operating at rated power. The report is to be prepared in consultation with the EPA and should meet the requirements set out in Appendix 2.	<p>This current audit relates to operation of the project, Conditions related to Construction have not been fully explored as they are not relevant to this audit.</p> <p>The Construction IEA conducted by J2M Systems in 2018 states the proponent was compliant with this condition, Citing the following evidence:</p> <ul style="list-style-type: none"> Operational noise report and evidence on file. Bodangora Wind Farm, Consolidated Environmental Noise Assessment, Sonus, January 2018. NSW EPA response (email dated 19/02/2018) outlining no concerns raised or comments on the noise verification report. 	Not Triggered	NT	-
Operational Noise Criteria – Wind Turbines					
F8	The Proponent shall ensure that the noise generated by the operation of wind turbines does not exceed the greater of: (d) 35 dB(A); or	<p>The Post-Construction Noise Monitoring Report for Bodangora Wind Farm by Resonate, Dated Tuesday 3 September 2019 was sighted and reviewed.</p> <p>This report addresses noise monitoring undertaken to address Condition F8. The report states:</p>	Considered Compliant	C	-







Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	<p>(e) the existing background noise level for each integer wind speed from cut-in speed to the rated power of the wind turbine generators, by more than 5 dB(A).</p> <p>Unless otherwise replaced by an equivalent NSW wind farm noise guideline, noise generated by the project is to be measured in accordance with the relevant requirements of Sections 3.1 and 3.2 of the South Australian Environment Protection Authority's Wind Farms Environmental Noise Guidelines 2009, as modified by the provisions in Appendix 3.</p> <p>However, these criteria do not apply if the Proponent has an agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p>	<p>Since the original Environmental Assessment for the Project, the NSW DPE has issued a Wind Energy: Noise Assessment Bulletin (NSW Bulletin), which could be considered to replace the SA Guidelines. However, we note that the procedures listed for operational monitoring in the NSW Bulletin reference those in the SA Guidelines and are otherwise consistent with Project Approval.</p> <p>This report concludes that Bodangora Wind Farm is operating in compliance with the noise emission requirements of the Noise Guarantee and Project Approval.</p>			
Operational Noise Criteria – Ancillary Infrastructure					
F9	<p>The Proponent shall ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) L_{Aeq}(15 minute) at any non-associated residence.</p> <p>Noise generated by the project is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (as may be updated from time-to-time), as modified by the provision in Appendix 3.</p> <p>However, these criteria do not apply if the Proponent has an agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p>	<p>The Post-Construction Noise Monitoring Report for Bodangora Wind Farm by Resonate, dated Tuesday 3 September 2019 was sighted and reviewed. This report addresses noise monitoring undertaken to address Condition F9. The report states:</p> <p><i>This report concludes that Bodangora Wind Farm is operating in compliance with the noise emission requirements of the Noise Guarantee and Project Approval.</i></p> <p>Letter from nominee of the Secretary to BWF dated 20/05/2022 stating acceptance and note of the above mentioned report was sighted.</p>	Considered Compliant	C	-
Operating Conditions					
F10	<p>The Proponent shall:</p> <p>(a) implement best management practice to minimise the construction, operational, decommissioning and road traffic noise and vibration of the project;</p> <p>(b) implement sector management of wind turbines to manage any wind directions or meteorological conditions that are found to result in exceedances of the noise criteria in condition F8;</p> <p>(c) undertake noise monitoring within 3 months of the commissioning of the wind farm, or other timing as may be agreed by the Secretary, to determine whether the project is complying with the relevant conditions of this approval; and</p> <p>(d) carry out further noise monitoring if required by the Secretary, to the satisfaction of the Secretary.</p>	<p>The Post-Construction Noise Monitoring Report for Bodangora Wind Farm by Resonate, dated Tuesday 3 September 2019 was sighted and reviewed. This report addresses Condition F10(c) and concludes:</p> <p><i>This report presents the results of noise compliance monitoring conducted at Bodangora Wind Farm. Noise levels with the wind farm operating have been measured at 10 locations and assessed against the requirements of the applicable Noise Guarantee and the Project Approval.</i></p> <p><i>The wind farm noise monitoring results demonstrate that noise levels from Bodangora Wind Farm is compliant with the relevant Project Approval requirements. No special characteristics, such as low frequency noise or tonality, were observed as part of the assessment.</i></p> <p><i>Additional noise monitoring conducted of the Bodangora Wind Farm substation determined that noise levels from the substation easily comply with the Project Approval requirements for substation noise.</i></p> <p><i>This report concludes that Bodangora Wind Farm is operating in compliance with the noise emission requirements of the Noise Guarantee and Project Approval.</i></p> <p>The OEMP Noise Management Sub-plan was also reviewed which outlines how this Condition is addressed through a Noise Reduction / Mitigation Strategy.</p> <p>Letter from nominee of the Secretary to BWF dated 20/05/2022 stating acceptance and note of the above mentioned report was sighted.</p> <p>The proponent has demonstrated it has implemented best management practices to minimise noise and vibration throughout the life of the project. No exceedances of noise criteria have been reported or discovered. No further noise monitoring has been ordered.</p>	Considered Compliant	C	-
F11-F18	Deleted	-	-	-	-
OPERATIONAL ENVIRONMENTAL MANAGEMENT					
F19	<p>Prior to the commencement of operation, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement (following approval) an Operation Environmental Management Plan for the Project. The Plan shall outline the environmental management practices and procedures that are to be followed during operation and shall be prepared in consultation with relevant agencies and in accordance with the <i>Guideline for the Preparation of Environmental Management Plans</i> (Department of Infrastructure, Planning and Natural Resources, 2004). The Plan shall include, but not necessarily be limited to:</p> <p>(a) a description of activities to be undertaken during operation of the Project (including staging and scheduling);</p> <p>(b) statutory and other obligations that the Proponent is required to fulfil during operation, including approval / consents, consultations and agreements required from authorities and other stakeholders under key legislation and policies;</p> <p>(c) overall environmental policies, guidelines and principles to be applied to the operation of the Project;</p> <p>(d) a description of the roles and responsibilities for relevant employees involved in the operation of the Project, including relevant training and induction provisions for ensuring that employees are aware of their environmental and compliance obligations under these Conditions of Approval;</p>	<p>The Bodangora Wind Farm Operational Environmental Management Plan (OEMP) was accessed on the Project website during this audit. The version online is dated 19/07/2022.</p> <p>Letter from nominee of the Secretary to BWF dated 22/08/2022 was sighted which states: <i>As nominee of the Planning Secretary, I approve the Operational Environmental Management Plan (Revision 5, dated 19 July 2022) under Condition 19, Schedule F.</i></p>	Considered Compliant	C	-



Condition of Consent	Requirement (exact wording)	Evidence collected	2025 Independent Audit Findings and Recommendations	Compliance Status	Unique Identifier of Non-compliance
	<p>(e) an environmental risk analysis to identify the key environmental performance issues associated with the operation phase of the Project; and</p> <p>(f) details of how environmental performance would be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts, including those safeguards and mitigation measures detailed in the EA (and any impacts arising from the staging of the construction of the Project); and</p> <p>(g) details of how sector management would be used to ensure that operational noise criteria are not exceeded.</p> <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of operation, or as otherwise agreed by the Secretary. Operation shall not commence until written approval has been received from the Director General. Upon receipt of the Secretary's approval, the Proponent shall make the Plan publicly available as soon as practicable.</p> <p><i>Note: The approval of an Operation Environmental Management Plan does not relieve the Proponent of any other requirement associated with this Project Approval. If there is an inconsistency with an approved Operation Environmental Management Plan and the conditions of this Project Approval, the requirements of this Project Approval prevail.</i></p>				
F20	Deleted	-	-	-	-
SCHEDULE G – ADDITIONAL PROCEDURES					
DECOMMISSIONING					
G1, G3, G4, G5	These conditions, apart from G2 outlined below, all relate to decommissioning of the project which is not relevant at this stage.	Not applicable	Not applicable	NT	-
G2	<p>The Proponent must:</p> <p>(a) rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;</p> <p>(b) minimise the total area exposed at any time; and</p> <p>(c) employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</p>	<p>Bodangora Windfarm Revegetation Monitoring Report – third site visit, Niche Environment and Heritage 18/03/2021 which concluded that areas requiring rehabilitation overall had become 'well-established, in good health and self-sustaining' (see Condition F6)</p> <p>Letter from the Compliance department dated 08/06/2022 regarding the above mentioned report, which states: <i>The department has carefully reviewed the report and notes that due to significant rain prior to the assessment and on-going management actions by CATCON, the disturbed areas shown in Figure 3 of the Report are now considered compliant with Condition F6 and no longer require monitoring as part of this condition. It is also noted that DPI Fisheries and Crown Lands have also reviewed the Report and are satisfied with the rehabilitation status.</i></p> <p>As per the 2022 audit, agreements with landholders varied and some ancillary facilities do not need to be rehabilitated as the land holders wished to take ownership of them such as gravel piles and fences. In particular the construction compound next to the O&M still has fencing and gravel piles present as per the landowner's request.</p> <p>Review of aerial photography shows the state of rehabilitation over time with areas that were heavily disturbed during construction now rehabilitated to pre-construction condition (see photo reference 6 and 7, Appendix B). Access roads and blade laydown areas will remain unrehabilitated for the life of the project</p> <p>The revegetation and rehabilitation program are complete and has been verified by an independent and suitably qualified expert from Niche Environment and Heritage (as agreed by the Secretary).</p>	Considered Compliant	C	-

Appendix B – Photos

Photo Reference	Location/ Relevant CoC	Photo
1	Chemical storage facilities relevant to Condition C11	
2	Mobile water tank and water storage facilities on site for fire fighting, Condition C16	

3	Waste management, Condition C29	
4	Kaiser mine heritage site Condition E2	 
5	Erosion earthworks at Turbine 31 and access road which shows erosion adequately managed	  

6	Rehabilitation of Ancillary facilities, aerial view of O&M facilities and construction compound pre, during and post construction. Condition E18 and G2			
7	Aerial view of turbines 2 and 3 pre, during and post construction. Showing rehabilitation of Ancillary facilities, Condition E18 and G2	<p data-bbox="674 520 853 544">Pre construction</p> 	<p data-bbox="1218 520 1435 544">During construction</p> 	<p data-bbox="1682 520 1771 544">Current</p>  <p data-bbox="539 1241 1715 1265">*New disturbances in current picture relate to exploratory drilling operations which is unrelated to the wind farm</p>

8	Safety Management System, Condition F2	
9	Carcass freezer	

Appendix C – Correspondence

NSW Department of Planning, Housing and Infrastructure – Compliance

Genevieve Peel

From: Jennifer Rowe <Jennifer.Rowe@planning.nsw.gov.au>
Sent: Wednesday, 12 February 2025 2:53 PM
To: Genevieve Peel
Subject: RE: Bodangora Wind Farm Independent Environmental Audit - Consultation

Hi Genevieve

Thank you for the reply.

I have done a check regarding the letter you provided and from my end it does not appear that a site inspection was undertaken.

I have spoken with the Officer that reviewed the previous IEA and he has suggested that you should also consider consulting with Crown lands regarding this IEA.

He has provided me with the following contact details:

Jacky Wiblin
Group Leader Dubbo Land & Asset Management
Crown Lands | Department of Planning and Environment
T 02 6883 5427 | E jacky.wiblin@crownland.nsw.gov.au
Level 1, 45 Wingewarra Street, Dubbo NSW 2830
Home of the Tubba-Gah people, Wiradjuri Country.
www.dpie.nsw.gov.au

If there is anything further I can assist with, please reach out.

Kind regards,

Jennifer Rowe
Senior Compliance Officer

Compliance | Department of Planning, Housing and Infrastructure
T 02 4247 1851 | M 0488 988 641 | 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



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: Genevieve Peel <gen@areaenv.com.au>
Sent: Wednesday, 5 February 2025 2:17 PM
To: Jennifer Rowe <Jennifer.Rowe@planning.nsw.gov.au>
Cc: Addy Watson <addy@areaenv.com.au>; Mel Hancock <mel@areaenv.com.au>; Phil Cameron <phil@areaenv.com.au>; Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Subject: RE: Bodangora Wind Farm Independent Environmental Audit - Consultation

Hi Jennifer,

Thank you for your prompt and helpful response. We will be sure to incorporate all these points in the audit report.

One other question I have is, did a site inspection ever occur, as per the attached letter?

Thank you

Genevieve Peel | Senior Environmental Consultant
B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)
Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830
p: 0429 452 221

Please note: I do not work Mondays



AREA Environmental & Heritage Consultants Pty Ltd

ABN: 29 616 529 867

We acknowledge Traditional Custodians and their ancestors.

If our bank account details change, we will notify you by letter, phone call or face-to-face, but never by email.

From: Jennifer Rowe <Jennifer.Rowe@planning.nsw.gov.au>
Sent: Wednesday, 5 February 2025 1:38 PM
To: Genevieve Peel <gen@areaenv.com.au>
Cc: Addy Watson <addy@areaenv.com.au>; Mel Hancock <mel@areaenv.com.au>; Phil Cameron <phil@areaenv.com.au>; Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Subject: FW: Bodangora Wind Farm Independent Environmental Audit - Consultation

To Genevieve Peel

Thank you for the email seeking consultation from Planning on the Bodangora Wind Farms upcoming Independent Environmental Audit.

Planning provides the following in response:

1. The Audit needs to ensure it reviews all conditions of Bodangora Wind Farms consent MP10_0157 and addresses the requirements for the Independent Environmental Audit, outlined in Schedule D, Condition D8 and D9.
2. Addresses the following aspects:

- Ensure that any comments from agencies and/or stakeholders consulted have been adequately addressed in the report, consultation should include but not limited to Biodiversity Conservation Division (BCS), Community Consultative Committee (CCC) and Dubbo Regional Council;
- Include a status update for any actions identified from any previous audits;
- Provide a high-level assessment as to whether the Environmental Management Plans and sub-plans required by the consent / approval are adequate;
- Include a review of the environmental performance of the development, including an assessment of actual and predicted impacts documents in the EIS;
- Identify any additional environmental management improvement opportunities; and
- Clearly identified key strengths of the development's environmental management and performance

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

Kind regards,
Jennifer Rowe
Senior Compliance Officer

Compliance | Department of Planning, Housing and Infrastructure
T 02 4247 1851 | **M** 0488 988 641 | **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



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.

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Please consider the environment before printing this e-mail

From: Genevieve Peel <gen@areaenv.com.au>
Sent: Tuesday, February 4, 2025 3:59 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>; Phil Cameron <phil@areaenv.com.au>
Cc: Addy Watson <addy@areaenv.com.au>; Mel Hancock <mel@areaenv.com.au>
Subject: Bodangora Wind Farm Independent Environmental Audit - Consultation

Dear Compliance team,

Thank you for the prompt approval for AREA Environmental & Heritage Consultants to be the Independent Environmental Auditors for the Bodangora Wind Farm. As per the audit requirements we are consulting with stakeholders to refine the audit scope.

This email is seeking any comment your department may have with respect to compliance for the Bodangora Wind Farm Project or, more broadly, any concerns outside the Conditions of Consent.

Your response will be included as an appendix to our report for transparency. Please do not hesitate to contact myself or AREA's Managing Director Phil (cc'd into this email, contact number 0409 852 098) if you have any questions about this email. Otherwise, we look forward to your reply.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant

B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)

Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830

p: 0429 452 221

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ABN: 29 616 529 867

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Genevieve Peel

From: Leasa Hutchins <leasa.hutchins@crownland.nsw.gov.au>
Sent: Friday, 28 February 2025 4:06 PM
To: Genevieve Peel
Cc: Phil Cameron; Mel Hancock
Subject: Bodangora Wind Farm Independent Environmental Audit - Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Genevieve

Thank you for providing information on the audit of the Bodangora Wind Farm approved Conditions of Consent and note compliance with Condition F5.

Crown Lands do not have any comment to add at this time.
Kind regards

Leasa

Leasa Hutchins
Acting Group Leader Property Management
Crown Lands
[Department of Planning, Housing and Infrastructure](#)

T 1300 886 235 E dubbo.crownlands@crownland.nsw.gov.au
dphi.nsw.gov.au
45 Wingewarra St, Dubbo NSW 2830 | PO Box 2185, Dangar NSW 2309

[Working days: Monday to Friday](#)

Our Vision: Crown land supports resilient, sustainable and prosperous communities across NSW.

The Department of Planning, Housing and 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.

From: Jacky Wiblin <jacky.wiblin@crownland.nsw.gov.au>
Sent: Thursday, 13 February 2025 10:25 PM
To: Leasa Hutchins <leasa.hutchins@crownland.nsw.gov.au>
Subject: FW: Bodangora Wind Farm Independent Environmental Audit - Consultation

Jacky

Jacky Wiblin
Group Leader – North Coast
Crown Lands
Department of Planning, Housing and Infrastructure

T 0268 83 5427 E jacky.wiblin@crownland.nsw.gov.au

dphi.nsw.gov.au

Level 1, 45 Wingewarra St
DUBBO NSW 2830

Working days Monday to Friday, 830am – 400pm



*The Department of Planning and Environment 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 consider the environment before printing this email.

From: Genevieve Peel <gen@areaenv.com.au>
Sent: Thursday, 13 February 2025 3:21 PM
To: Jacky Wiblin <jacky.wiblin@crownland.nsw.gov.au>
Cc: Phil Cameron <phil@areaenv.com.au>; Mel Hancock <mel@areaenv.com.au>
Subject: Bodangora Wind Farm Independent Environmental Audit - Consultation

Hi Jacky,

AREA Environmental & Heritage Consultants have been appointed as the Independent Environmental Auditors for the Bodangora Wind Farm. The audit requires us to consult with a range of stakeholders to obtain their input into the scope of the audit above what's expected in the approved Conditions of Consent. The NSW Compliance department also suggested we consult with you on this matter.

We note that Bodangora Wind Farm has consulted with Crown Lands regarding Condition F5 which was not met in the 2022 audit findings. We believe this matter has now been resolved. This email is seeking any comment Crown Lands may have with respect to compliance for the Project or more broadly any concerns outside these conditions.

Your response will be included as an appendix to our report for transparency. Please do not hesitate to contact myself or AREA's Managing Director Phil (cc'd into this email, contact number 0409 852 098) if you have any questions about this email. Otherwise, we look forward to your reply.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant

B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)

Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830

p: 0429 452 221

Please note: I do not work Mondays



AREA



AREA Environmental & Heritage Consultants Pty Ltd

ABN: 29 616 529 867

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NSW Department of Climate Change, Energy, the Environment and Water - North West Conservation Programs, Heritage & Regulation Group (CPHR, formally Biodiversity Conservation Division (BCS))



Department of Climate Change, Energy, the Environment and Water

Our ref: DOC25/97665

Genevieve Peel
Senior Environmental Consultant
AREA Environmental & Heritage Consultants
gen@areaenv.com.au

Dear Genevieve

Bodangora Wing Farm – Independent Environmental Audit

Thank you for your request via e-mail dated 4 February 2025 to the Conservation Programs, Heritage and Regulation Group (CPHR), formerly the Biodiversity, Conservation and Science Group (BCS), of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) inviting comment on your proposed independent environmental audit of Bodangora Wind Farm.

CPHR continues to engage with Bodangora Wind Farm in regards their Bird and Bat Management Plan (BBAMP). CPHR has been consistently disappointed with the lack of analysis in these reports. We have requested the reports provide a degree of analysis that may provide insights into the success of mitigation actions or environmental conditions that may influence blade strike or carcass detection.

CPHR are particularly concerned about the on-going strikes of wedge-tailed eagles at wind farms and the potential for the regional eagle population to suffer a significant long-term decline. It is noted that the number of wedge-tailed eagle strikes at Bodangora Wind Farm has decreased across the three formal years of monitoring (years one, two and five of operation).

The annual reports do not include data for years three and four despite stating that wedge-tailed eagle carcasses are not scavenged at all and remaining in-situ until total decomposition. It is therefore to be expected that these carcasses would be reported as incidental finds by wind farm personnel and should be included in any analysis.

During the same formal monitoring period, the number of observations of wedge-tailed eagle flights across the carcass monitoring periods were 22 in year one, four in year two and 12 in the fifth year of operation. No data has been provided to CPHR for years three and four of operation. The Year 5 Annual BBAMP Report concludes that *"this indicates that wedge-tailed eagle utilisation of the site continues, potentially in low numbers"* without acknowledging that the strike and observation data suggest that there may be a decline in utilisation of the site by this species.

Condition C6 specifies that the BBAMP *"shall incorporate Monitoring, and a Decision Matrix that clearly sets out how the Proponent will respond to the outcomes of monitoring"*. Condition C6 (d) states that the proponent must *"identify 'at risk' bird and bat groups"* while Condition C6 (f) states that the proponent must *"identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the application of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success"*. CPHR is concerned that the annual reporting is not providing sufficient analysis to satisfy these conditions.

rog.nw@environment.nsw.gov.au | environment.nsw.gov.au | 1

We request that the audit include an assessment of the annual BBAMP reports and whether the appropriate approval conditions are being met.

If you have any questions about this advice, please do not hesitate to contact David Geering, Senior Conservation Planning Officer, via david.geering@environment.nsw.gov.au or (02) 6885 0335.

Yours sincerely,



Samantha Wynn
Senior Team Leader Planning, North West
Conservation Programs, Heritage and Regulation Group

6 February 2025

Genevieve Peel

From: David Ward <david.ward@dpi.nsw.gov.au>
Sent: Wednesday, 5 February 2025 12:42 PM
To: Genevieve Peel; Phil Cameron
Cc: Addy Watson; Mel Hancock
Subject: RE: Bodangora Wind Farm Independent Environmental Audit - Consultation

Hi Genevieve,

Thank you for providing me with the opportunity to provide comment from our department with respect to compliance with consent conditions for this project and the independent audit.

DPIRD Fisheries were consulted and asked to review the Bodangora Windfarm Revegetation Monitoring-Third Visit Report dated 18th March 2021 as per conditions F5 and F6 of the Development Consent to determine whether the department was satisfied with rehabilitation of areas of disturbance to watercourses and associated riparian vegetation and that revegetation measures had been undertaken consistent with these requirements.

DPIRD Fisheries reviewed the independent report and responded that our department was satisfied with the revegetation rehabilitation adjacent to mapped hydrolines and Key Fish Habitat and were satisfied with the rehabilitation of disturbances adjacent to waterway crossings. Our department was satisfied that a site inspection by DPIRD Fisheries was not warranted.

DPIRD Fisheries have no further requirements or concerns that need to be raised with regards this development and compliance with the development conditions.

Cheers
David

David Ward
Fisheries Manager Murray Darling
Fisheries and Forestry
**Department of Primary Industries
and Regional Development**

T 02 6763 1255 **M** 04 2990 8856 **E** david.ward@dpi.nsw.gov.au
nsw.gov.au/dpird

4 Marsden Park Road CALALA NSW 2340



**Department of Primary Industries
and Regional Development**

We stand on Country that always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for Elders past, present and emerging. We are

committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.

From: Genevieve Peel <gen@areaenv.com.au>
Sent: Tuesday, 4 February 2025 3:45 PM
To: David Ward <david.ward@dpi.nsw.gov.au>; Phil Cameron <phil@areaenv.com.au>
Cc: Addy Watson <addy@areaenv.com.au>; Mel Hancock <mel@areaenv.com.au>
Subject: Bodangora Wind Farm Independent Environmental Audit - Consultation

Hi David,

AREA Environmental & Heritage Consultants have been appointed as the Independent Environmental Auditors for the Bodangora Wind Farm. The audit requires us to consult with a range of stakeholders to obtain their input into the scope of the audit above what's expected in the approved Conditions of Consent.

We note that Bodangora Wind Farm has consulted with DPI regarding Condition F5 which was not met in the 2022 audit findings. We believe this matter has now been resolved. This email is seeking any comment DPI may have with respect to compliance for the Project or more broadly any concerns outside these conditions.

Your response will be included as an appendix to our report for transparency. Please do not hesitate to contact myself or AREA's Managing Director Phil (cc'd into this email, contact number 0409 852 098) if you have any questions about this email. Otherwise, we look forward to your reply.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant
B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)
Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830
p: 0429 452 221

Please note: I do not work Mondays



AREA Environmental & Heritage Consultants Pty Ltd

ABN: 29 616 529 867

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If our bank account details change, we will notify you by letter, phone call or face-to-face, but never by email.

Genevieve Peel

From: Genevieve Peel
Sent: Wednesday, 26 February 2025 9:13 AM
To: info@epa.nsw.gov.au
Subject: RE: Bodangora Wind Farm Independent (EPL 20927) Environmental Audit - Consultation

Dear EPA team,

I am just following up from my email below, just double checking to see if you had anything you wanted to contribute as I will be finishing up the audit this week.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant
B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)
Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830
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ABN: 29 616 529 867

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From: Genevieve Peel
Sent: Wednesday, 5 February 2025 2:37 PM
To: info@epa.nsw.gov.au; Phil Cameron <phil@areaenv.com.au>
Cc: Mel Hancock <mel@areaenv.com.au>; Addy Watson <addy@areaenv.com.au>
Subject: Bodangora Wind Farm Independent (EPL 20927) Environmental Audit - Consultation

Dear EPA team,

AREA Environmental & Heritage Consultants have been appointed as the Independent Environmental Auditors for the Bodangora Wind Farm for the 2022 to 2024 period.

The audit requires us to consult with a range of stakeholders to obtain their input into the scope of the audit above what's expected in the approved Conditions of Consent. We have reviewed the EPA public registers for EPL license 20927 and note that there have not been any notices, applications, or non-compliances since 2020.

This email is seeking any comment EPA may have about compliance of Bodangora Wind Farm or any environmental concerns you may want to raise with respect to compliance of the Project.

Your response will be included as an appendix to our report for transparency. Please do not hesitate to contact myself or AREA's Managing Director Phil (cc'd into this email, contact number 0409 852 098) if you have any questions about this email. Otherwise, we look forward to your reply.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant

B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)

Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830

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AREA Environmental & Heritage Consultants Pty Ltd

ABN: 29 616 529 867

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MP10_0157
AD25/18752
Parcel 48471
DTQ:DQ

4 March 2025

AREA Environmental & Heritage Consultants Pty Ltd
72 Brisbane Street
DUBBO NSW 2830



Genevieve Peel,

SSD-MP10_0157 BODANGORA WIND FARM

Thank you for the email received by Council on Wednesday 12 February 2025, regarding the Environmental Audit to be carried out with regard to the Bodangora Wind Farm, in accordance with Condition D8 and covering the development in its entirety.

The email has been forwarded to appropriate officers within Dubbo Regional Council, and the only issue raised, related to:

- 2022 Independent Audit Findings and Recommendations

The 2022 Audit often stated: *This current audit relates to operation of the project, conditions related to Construction have not been fully explored as they are not relevant to this audit.*

For example, Condition C9 relates to waterway crossings, but this wasn't deemed relevant to the 2022 Audit? This is similar, with regard to Condition No's C12, 13, 14 & 15.

- Planning Agreement

With regard to Condition B16, the contributions requirement is operating satisfactorily.

- Bio-diversity

Council notes that condition C1 limits clearing to 1.32 hectares, but that the Secretary amended this area to 3.0 hectares on 24/11/2017, it seems inconsistent that the consent hasn't been amended accordingly.

- Bird and bat monitoring and management

Council notes a significant number of bird and bat strikes, and is interested in the proponents response to mitigating this issue, in addition to the additional monitoring.



All communications to: **CHIEF EXECUTIVE OFFICER**

ABN 53 539 070 928

PO Box 81 Dubbo NSW 2830

T (02) 6801 4000 **F** (02) 6801 4259 **E** council@dubbo.nsw.gov.au

Civic Administration Building Church St Dubbo NSW 2830

W dubbo.nsw.gov.au

- Design and Landscape Plan

Council raises concerns as to whether the Design and Landscape Plan has been implemented.

For any further enquiries in this matter, please do not hesitate to contact Darryll Quigley during normal office hours, on 6801 4656.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Quigley', with a stylized flourish at the end.

Darryll Quigley
Manager Building and Development Services

Genevieve Peel

From: Genevieve Peel
Sent: Wednesday, 26 February 2025 9:11 AM
To: Darryll Quigley; Mel Hancock; Phil Cameron
Subject: RE: Bodangora Wind Farm MP10_0157 - Intendant Environmental Audit - Consultation

Hi Darryll,

I am just following up from my email below, just double checking to see if you had anything you wanted to contribute as I will be finishing up the audit this week.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant
B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)
Biodiversity | Heritage | Landscape Design | Compliance

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ABN: 29 616 529 867

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From: Genevieve Peel
Sent: Thursday, 13 February 2025 2:50 PM
To: 'Darryll Quigley' <Darryll.Quigley@dubbo.nsw.gov.au>; Mel Hancock <mel@areaenv.com.au>
Cc: Christy White <christy.white@dubbo.nsw.gov.au>
Subject: RE: Bodangora Wind Farm MP10_0157 - Intendant Environmental Audit - Consultation

Hi Darryll,

Thank you for your email, I appreciate you taking the time to respond to me. The wind farm manager had given me Christy's contact details which is why I connected her initially.

The answers to your questions are in red below:

Am I correct in assuming that the current consent is Modification 4 dated December 2017?

That is correct , please see conditions here:

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP10_0157-MOD-4%2120191018T005749.636%20GMT

What exactly is meant by an 'environmental audit'?

As per Condition D8., the proponent must commission an Independent Environmental Audit of the project. This audit is guided by the Planning Departments Post Approval Requirements (PAR) document: <https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf> and it includes a component of consultation with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit.

Is that the entire development or only the 'environmental aspects'?

The audit covers a review of all conditions of consent, you can see the 2022 audit for Bodangora Wind Farm here <https://www.infigenenergy.com/assets/Independent-Environmental-Audit-2019-2021.pdf> which shows how conditions area assessed

Are you referring to conditions D8, D9, D10 & D11?

Yes, but specifically, as per Condition B16 of the project approval Conditions of Consent and the Planning Agreement with council, we need to confirm whether Bodangora Wind Farm has been making ongoing contributions to the Bodangora Community benefit Fund, road maintenance and administration costs and any if Council has any concerns it wants to raise with respect to compliance.

Additionally, when would you like a response by?

By the end of next week if possible, please. Responses are usually just a short email reply if you are happy the wind farms performance and do not have any compliance concerns. Alternatively you can request the auditor looks more closely into a issue you may have concerns about.

I hope this helps. Do not hesitate to contact me if you have any further questions.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant

B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)

Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830

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ABN: 29 616 529 867

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From: Darryll Quigley <Darryll.Quigley@dubbo.nsw.gov.au>

Sent: Wednesday, 12 February 2025 1:52 PM

To: Genevieve Peel <gen@areaenv.com.au>

Cc: Christy White <christy.White@dubbo.nsw.gov.au>

Subject: Bodangora Wind Farm MP10_0157 - Intendant Environmental Audit - Consultation

Genevieve,

Unfortunately, Christie White Manager Community Services is not the appropriate contact with regard to an 'environmental audit' of the development, and as such I will be co-ordinating Council's response.

Am I correct in assuming that the current consent is Modification 4 dated December 2017?

What exactly is meant by an 'environmental audit'?

Is that the entire development or only the 'environmental aspects'?

Are you referring to conditions D8, D9, D10 & D11?

Additionally, when would you like a response by?

For any additional information regarding this matter please contact me on 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.



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From: Genevieve Peel <gen@areaenv.com.au>

Sent: Wednesday, 12 February 2025 12:33 PM

To: Christy White <christy.White@dubbo.nsw.gov.au>; Dubbo Regional Council <council@dubbo.nsw.gov.au>

Cc: Mel Hancock <mel@areaenv.com.au>

Subject: RE: Bodangora Wind Farm Intendant Environmental Audit - Consultation

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

Dear Christy,

I am just following up on my previous email below – have you had a chance to read it and do you have anything to respond?

I look forward to your reply.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant

B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)

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ABN: 29 616 529 867

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From: Genevieve Peel

Sent: Tuesday, 4 February 2025 1:42 PM

To: christy.White@dubbo.nsw.gov.au; Phil Cameron <phil@areaenv.com.au>

Cc: Mel Hancock <mel@areaenv.com.au>

Subject: Bodangora Wind Farm Intendant Environmental Audit - Consultation

Dear Christy,

AREA Environmental & Heritage Consultants from Dubbo have been appointed as the Independent Environmental Auditors for the Bodangora Wind Farm – part of the audit requires us to consult with a range of stakeholders to obtain their feedback regarding the Bodangora Wind Farm's environmental performance and compliance with Conditions of Consent. Manager Michael Bullock passed on your details as he thought you would be the best contact for our consultation.

This email is seeking any comment from a representative of Dubbo Regional Council about Bodangora Wind Farm and ask if Council has any concerns it wants to raise with respect to compliance. Any comments or concerns about the environmental performance of the project during the audit period will be investigated and your response will be included as an appendix to our report for transparency.

Also, as per Condition B16 of the project approval Conditions of Consent and the Planning Agreement with council, we need to confirm whether Bodangora Wind Farm has been making ongoing contributions to the Bodangora Community benefit Fund, road maintenance and administration costs.

Please do not hesitate to contact myself or AREA's Managing Director Phil (cc'd into this email, contact number 0409 852 098) if you have any questions about this email. Otherwise, we look forward to your reply.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant

B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)

Biodiversity | Heritage | Landscape Design | Compliance

a: "The Old Macquarie Brewery" c1876, 72 Brisbane Street, Dubbo NSW 2830

p: 0429 452 221

Please note: I do not work Mondays



AREA Environmental & Heritage Consultants Pty Ltd

ABN: 29 616 529 867

We acknowledge Traditional Custodians and their ancestors.

If our bank account details change, we will notify you by letter, phone call or face-to-face, but never by email.

Consultative Community Committee

Genevieve Peel

From: ian.rogan@bigpond.com
Sent: Tuesday, 4 February 2025 6:27 PM
To: Genevieve Peel; Phil Cameron
Cc: Mel Hancock
Subject: RE: Bodangora Wind Farm Intendant Environmental Audit - Consultation

Noted Genevieve-I have chaired the Bodangora Wind Farm CCC since late 2015 and continue to do so. During that time Infigen Energy and now Iberdrola have both been highly effective in supporting the functioning of the CCC in accordance with the Community Consultative Committee Guidelines. If you require more detailed feedback or comments on particular issues relating to the CCC functionality, don't hesitate to get back to me.

Ian Rogan

Chair, Bodangora Wind Farm CCC

0418484088

From: Genevieve Peel <gen@areaenv.com.au>
Sent: Tuesday, 4 February 2025 1:16 PM
To: Ian Rogan <ian.rogan@bigpond.com>; Phil Cameron <phil@areaenv.com.au>
Cc: Mel Hancock <mel@areaenv.com.au>
Subject: Bodangora Wind Farm Intendant Environmental Audit - Consultation

Dear Ian,

As per the 2022 Independent Environmental Audit, AREA Environmental & Heritage Consultants from Dubbo have again been appointed as the Independent Environmental Auditors for the Bodangora Wind Farm. As per the wind farms condition of consent number D8, this audit occurs every three years.

The audit requires the auditor to consult with a range of stakeholders to obtain their feedback in regard to the Bodangora Wind Farm Environmental Assessment and Conditions of Consent. Specifically in regards to the Community Consultative Committee, we need to assess whether Condition D1, outlined below, has been adequately addressed:

COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT

Community Consultative Committee

D1. From the commencement of construction, the Proponent must operate a CCC for the Project to the satisfaction of the Secretary, in accordance with the *Community Consultative Committee Guidelines for State Significant Projects (2016)* or its latest version.

This email is seeking any comment you, on behalf of the Community Consultative Committee, may have about this matter or more broadly any concerns you want to raise with respect to compliance (meeting Conditions of Consent) for the Project. Any comments or concerns about the environmental performance of the project during the audit period will be investigated and your response will be included as an appendix to our report for transparency.

Please do not hesitate to contact myself or AREA's Managing Director Phil (cc'd into this email, contact number 0409 852 098) if you have any questions about this email. Otherwise, we look forward to your reply.

Thank you

Kind Regards

Genevieve Peel | Senior Environmental Consultant

B.Sc (Env)(Hons), NSW Biodiversity Assessment Method (BAAS23015)

Biodiversity | Heritage | Landscape Design | Compliance

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Appendix D – Independent Environmental Audit Auditor Approval

Department of Planning, Housing and Infrastructure



NSW Planning ref: MP10_0157-PA-24

Mr Matt Dickie
GM Renewables O&M
Bodangora Wind Farm Pty Limited
Level 22, Governor Phillip Tower 1 Farrar Place
Sydney New South Wales 2000
19/01/2025

Sent via the Major Projects Portal only

Subject: Bodangora Wind Farm Project – Independent Environmental Audit team endorsement request

Dear Mr Dickie

Reference is made to your post approval matter, MP10_0157-PA-24, request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Environmental Audit of Bodangora Wind Farm Project, submitted as required by Condition D8 of MP10_0157 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 16 January 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 Condition D8 of the approval and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team from AREA Environmental & Heritage Consultants:

1. Mr Philip Cameron – Lead Auditor
2. Ms Addy Watson
3. Mrs Genevieve Peel
4. Dr Heidi Kolkert

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

The experts must attend site (unless otherwise agreed by the Secretary) and the IEA report must include specific sections (and/or an appended report) prepared by the experts which addresses their

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

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1

Department of Planning, Housing and Infrastructure



assessment of compliance (and recommendations for improvements) in respect to the conditions, management plans and any other matters considered relevant for their areas of expertise.

Within 3 months of commencing an audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report and a timetable for the implementation of the recommendations.

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

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

Yours sincerely

A handwritten signature in black ink, appearing to read "K O'Reilly", enclosed in a light grey rectangular box.

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

Appendix E – Declarations

Declaration of Independence Form

Declaration of Independence - Auditor

Project Name: Bodangora Wind Farm Project

Consent Number: MP 10_0157

Description of Project: 33 turbine Wind Farm

Project Address: Bodangora, NSW

Proponent: Bodangora Wind Farm Pty Ltd

Date: 05/02/2025

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

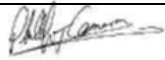
Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor: Phil Cameron

Signature:



Qualification: BSc, Ass Dip App Sci.

Company: AREA Environmental & Heritage Consultants

Name of Auditor: Mel Hancock

Signature:

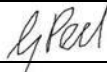


Qualification: Audit Team Leader in WHS, Environment and Quality including integrated management systems with Global-Mark (certification pending)

Company: AREA Environmental & Heritage Consultants

Name of Auditor: Genevieve Peel

Signature:



Qualification: B.Sc.(Env)(Hons)

Company: AREA Environmental & Heritage Consultants

Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

Project Name: Bodangora Wind Farm Project

Consent Number: MP 10_0157

Description of Project: 33 turbine wind farm

Project Address: Bodangora NSW

Proponent: Bodangora Wind Farm Pty Ltd

Date: 05/02/2025

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to 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) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the

monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor: Phil Cameron


Signature: 

Qualification: BSc, Ass Dip App Sci.

Company: AREA Environmental & Heritage Consultants

Company Address: "The Old Macquarie Brewery" 72 Brisbane Street, Dubbo, NSW, 2830

Name of Auditor: Genevieve Peel

Signature: 

Qualification: B.Sc(Env)(Hons)

Company: AREA Environmental & Heritage Consultants

Name of Auditor: Mel Hancock

Signature: 

Qualification: Audit Team Leader in WHS, Environment and Quality including integrated management systems with Global-Mark (certification pending)

Company: AREA Environmental & Heritage Consultants

Appendix F – Additional information



**Planning &
Environment**

Resource Assessments

Contact: Tim Stuckey

Phone: 9274 6314

Email: tim.stuckey@planning.nsw.gov.au

Mr Tony Clark
Director
Bodangora Wind Farm Pty Limited
Level 22, 56 Pitt Street
SYDNEY NSW 2000

Dear Mr Clark

Bodangora Wind Farm (MP 10_0157)
Condition C1 - Vegetation Clearing and Condition C7 – Biodiversity Offset Package

I refer to your letter dated 6 November 2017 regarding the proposed additional vegetation clearing for the Bodangora Wind Farm project.

I note that following detailed investigation of the transmission line route and consultation with Transgrid, Infigen has identified that the project would result in additional clearing of native vegetation in order to minimise the bushfire risk associated with operation of the transmission line.

As you would be aware, the project approval currently allows for a clearing limit of 1.32 hectares of native vegetation, unless otherwise agreed by the Secretary. I understand that Infigen is seeking approval to allow an increase in clearing to around 3 hectares.

I note that Infigen has consulted with the Office of Environment and Heritage (OEH) regarding the proposed increase and that OEH indicated it would require the clearing to be appropriately offset.

I can advise that OEH has reviewed the updated Biodiversity Offset Package (BOP) (dated October 2017) provided in support of the request and is satisfied that it appropriately addresses the additional clearing. Consequently, OEH has recommended that the Department approve the updated BOP.

On this basis, the Department has agreed to Infigen's request to increase the clearing limit for the project, and has approved the updated BOP.

Please make the final version of the BOP available on your website as soon as possible.

If you have any further enquiries about this matter, please contact Tim Stuckey on the above contact details.

Yours sincerely

Mike Young
Director
Resource Assessments
as nominee of the Secretary

24/11/17.

Department of Planning and Environment
320 Pitt Street Sydney NSW 2000 | GPO Box 39 Sydney NSW 2001 | T 02 9274 6111 | F 02 9228 6455 | www.planning.nsw.gov.au