

**FLYERS CREEK WIND FARM (MP 08_0252)
INDEPENDENT ENVIRONMENTAL AUDIT NO. 2 REPORT**

April 2026

Auditee: Flyers Creek Wind Farm Pty Ltd (proponent)

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This Independent Environmental Audit report has been certified by Toby Hobbs, Lead Auditor (Exemplar Global) and Director of Vantage Environmental Management Pty Ltd.

Report Revision	Date	Comments	Prepared by	Approved for issue by
Draft	08 April 2026	Issued to proponent for comment	T. Hobbs S. Price	T. Hobbs
Rev 1.0	20 April 2026	Finalised to address minor comments	T. Hobbs S. Price	T. Hobbs

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GLOSSARY

Term	Definition
ACHAR	Aboriginal Cultural Heritage Assessment Report
BCD	Biodiversity and Conservation Division of the Department of Planning and Environment (now CPHR)
BCS	Biodiversity, Conservation and Science Directorate of the Department of Planning and Environment (now CPHR)
BMP	(Construction) Bushfire Management Plan
BOR	Biodiversity Offset Report
CPHR	Conservation Programs, Heritage and Regulation branch within DCCEEW
Council	Blayney Shire Council
(the) Department	NSW Department of Planning, Housing and Infrastructure
DCCEEW	NSW Department of Climate Change, Energy, Environment and Water
DPHI	NSW Department of Planning, Housing and Infrastructure
EEC	Endangered Ecological Community
EIS	Environmental Impact Statement
EP&A Act 1979	Environmental Planning & Assessment Act 1979
EPA	NSW Environment Protection Authority
FCWF	Flyers Creek Wind Farm
FRNSW	Fire and Rescue NSW
HBT	Hollow-bearing trees
IAPAR	Independent Audit Post Approval Requirements (DP&E, May 2020)
IEA	Independent Environmental Audit
PMO	Project Management Office
(the) Project	Flyers Creek Wind Farm
Project Approval	The Project Approval (under Section 75J of the <i>Environmental Planning & Assessment Act 1979</i>) NSW Department of Planning and Environment [DPE] Application Number MP 08_0252 including modifications 1 - 5
Proponent	Flyers Creek Wind Farm Co Pty Ltd
RFS	Rural Fire Service
Planning Secretary	Planning Secretary under the EP&A Act 1979, or nominee
Vantage	Vantage Environmental Management Pty Ltd (Auditor)
WTG	Wind Turbine Generator

1 EXECUTIVE SUMMARY

This report presents the findings of a second Independent Environmental Audit (IEA) that was undertaken to assess the environmental performance and compliance status of the Flyers Creek Wind Farm project (MP 08_0252), herein referred to as the “Project”.

Condition E8 of the Project Approval (as modified) specifies the requirements for IEA’s and this IEA was the second audit completed for the Project and commissioned three (3) years after the first audit. The IEA was undertaken by the audit team of Toby Hobbs and Susannah Price of Vantage Environmental Management Pty Ltd.

This audit covered the period from the day after the site inspection of the previous audit, i.e. 11 May 2023, to the date of the current audit site inspection, i.e. 19 March 2026, and was conducted in accordance with the *Independent Audit Post Approval Requirements* (IAPAR, May 2020).

There were three (3) non-compliances identified with the Project Approval conditions and associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (FCWF-IEA2-NC1):** Occupation Certificates have not been finalised for the substation and O&M facility and the 38 wind turbine generators in accordance with Infrastructure Approval Condition C11;
- **Non-compliance No. 2 (FCWF-IEA2-NC2):** Required contact details associated with operation of the Project were published in a local newspaper, The Western Advocate, however the date of publication was after commencement of operation, which was not in accordance with Infrastructure Approval Condition E2; and
- **Non-compliance No. 3 (FCWF-IEA2-NC3):** A turbine blade breakage, which occurred due to a lightning strike, was considered by the Department of Planning, Housing and Infrastructure (DPHI) to be a reportable incident due to the potential to cause “Material harm to the environment” (as defined in the Infrastructure Approval). The incident was not reported to DPHI immediately, in accordance with Infrastructure Approval Condition E6.

Based on the non-compliances identified during the audit program the following recommendations are made:

- **Recommendation No. 1 (FCWF-IEA2-R1):** Finalise obtaining Occupation Certificates for the substation and O&M facility and the 39 wind turbine generators as a priority;
- **Recommendation No. 2 (FCWF-IEA2-R2):** The compliance tracking program should be reviewed to ensure that future notification deadlines are met; and
- **Recommendation No. 3 (FCWF-IEA2-R3):** The proponent should review the incident reporting mechanisms provided in the Compliance Tracking Program and the OEMP to ensure any future incidents of a similar nature are reported the Department, in accordance with Condition E6.

In addition to the above noted recommendations, two (2) opportunities for improvement identified with the Project Approval conditions and associated management plans and strategies reviewed during the audit program:

- **Opportunity for Improvement No. 1 (IEA2):** Liaise with Blayney Shire Council, including the General Manager, to confirm if there are any outstanding road repair items. If any road repair items are still outstanding, they should be expedited as a priority.
- **Opportunity for Improvement No. 2 (IEA2):** During the next OEMP update, please update Section 12 (including table in Section 12.1) for clarity as there are some incorrect references to Appendix H of the FCWF BMP. In addition, please ensure correct naming of the BMP and FERP throughout Section 12 as there are currently different reference names for these plans. It is suggested that the frequency and

scope of routine environmental monitoring could also be reviewed during the next OEMP update as the site is now well established and operating in a compliant manner.

Areas of higher performance related to environmental management during construction and operation included:

- The standard of rehabilitation of construction areas across all viewed areas of the Project site was excellent. It was apparent that particular attention had been given to blending former works areas with the surrounding landscape, establishing good groundcover, extensive tree planting and robust drainage controls;
- Micro-siting of permanent access tracks had occurred to reduce the need for clearing of native vegetation and / or disturbance of heritage sites;
- The design of the access road in the vicinity of a significant heritage site was optimised and configured with additional engineering features to allow for long-term protection and enhancement of the site in consultation with the site Registered Aboriginal Party (RAP);
- Site personnel have actively participated in First Nations education programs and continue to work closely with the site RAP;
- Innovative and modern technological solutions are in place to optimise resource use and actively manage potential environmental risks. Such solutions involve remote, real-time monitoring of fire-fighting water tank levels, use of remote sensing equipment, accurate and high-quality record keeping, integration of multiple data management systems to provide a cohesive and centralised source of relevant Project information and development of site-specific management protocols;
- The current site management team have placed a strong focus on stakeholder engagement, particularly with landowners (both associated and non-associated). Significant resources have been invested to close-out any defects and/or concerns relating to the works undertaken by the construction contractor. Relevant information regarding safety protocols has been provided to adjoining landowners and Iberdrola have also worked closely with these landowners to optimise site rehabilitation and revegetation works;
- An effective habitat enhancement program has been instigated in the area of turbines T24-T27. The program includes fauna crossing infrastructure and tree planting following the *Eucalyptus Canobolensis* clearing incident that occurred in 2022 during construction of the Project. A local ecology specialist was closely involved in the design and implementation of the program and excellent outcomes were evident including an increase in squirrel glider numbers at this location;
- A robust and successful revegetation program has been instigated across the Project site with excellent early-stage results evident. The Project team have committed to a tree replacement ratio of 5:1 which is higher than the requirement of 2:1. Tree stock has been sourced from local nurseries and planting supervision has been provided by appropriately qualified and experienced personnel;
- The Auditor spoke to a Senior Conservation Planning Officer at CPHR who has been in regular communication with Iberdrola (and receiving monthly reports) and they were pleased at the level and openness of communication with site personnel; and
- The overall impacts on biodiversity observed on site were deemed consistent with Project Approval conditions, and below what was predicted by the environmental assessment (Biodiversity Offset Report) and below the approved EEC and HBT clearing limits.

The Auditor commends the proponent and site team for their strong commitment to best practice environmental management and focus not only on minimising operational impacts, but also on building good relationships with stakeholders and enhancing the environmental values of the Project site.

2 INTRODUCTION

2.1 Background

This report presents the findings of an Independent Environmental Audit (IEA) that was undertaken by an audit team of Toby Hobbs and Susannah Price of Vantage Environmental Management Pty Ltd to assess the environmental performance and compliance status of the Flyers Creek Wind Farm (MP 08_0252), herein referred to as the “Project”). The IEA was a requirement of Schedule E, Condition E8 of the Project’s Project Approval (as modified) and was conducted in accordance with DP&E’s *Independent Audit Post Approval Requirements* (IAPAR, May 2020). This audit was the second IEA for the Project and commissioned three (3) years after the first audit.

The Project is a 145MW wind farm capable of generating approximately 450 GWhr of electricity per year. Approval of the Project allows for the construction (and operation and decommissioning) of 38 wind turbines and associated infrastructure such as access tracks, local road infrastructure upgrades, electrical connections between the turbines, a 33kV power line, an on-site substation and a 132kV power line and switching station. The Project is located off Errowanbang Road, approximately 20km south of Orange in central-west New South Wales with the majority of the Project located within the Blayney Shire Council local government area and part of the 132kV power line, switching station and grid connection point located within the Cabonne Shire Council local government area.

The site of the Project is located within low density rural residential development and has been mostly cleared for sheep and cattle grazing.

The Project proponent is Flyers Creek Wind Farm Pty Ltd (a subsidiary of Iberdrola Australia Limited [Iberdrola]) and the contractor responsible for construction of the Project was Green Light Contractors (GLC). To assist in Project delivery, a Project Management Office (PMO) was established by Jacobs (Australia) on behalf of the proponent.

2.2 Audit Team

The audit team comprised Toby Hobbs as the Lead Auditor and Susannah Price as Assistant Auditor. Endorsement of the audit team was provided by DPHI via the correspondence of 13 January 2026, a copy which is included within Appendix A of this report.

2.3 Audit Objectives

The objective of the IEA was to obtain an independent and objective assessment of the environmental performance and compliance status of the Project in accordance with Condition E8 of the Project Approval and the *Independent Audit Post Approval Requirements* (DPIE, 2020). The audit scope, discussed below in section 2.4, provides further detail of the audit objectives.

2.4 Audit Scope

The audit scope consisted of:

- An assessment of compliance with:
 - a. Project Approval for MP 08_0252 dated 14 March 2014 including:
 - Modification 1 (13 March 2015);
 - Modification 2 (14 September 2015);
 - Modification 3 (30 November 2017);

- Modification 4 (22 August 2019); and
 - Modification 5 (15 October 2021).
- b. Post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans during the construction and operation phase including:
- Final Layout Plans (Condition C9);
 - Bird and Bat Adaptive Management Program (Condition D4);
 - Biodiversity Offset Package (Condition D6);
 - Design and Landscaping Plan (Condition D26);
 - Compliance Tracking Program (Condition E5);
 - Construction Management Plans including:
 - Construction Environmental Management Plan (Condition F20);
 - Construction Compound and Ancillary Facilities Management Plan (Condition F21(a));
 - Construction Noise and Vibration Management Plan (Condition F21(b));
 - Construction Traffic and Access Management Plan (Condition F21(c));
 - Construction Soil and Water Quality Management Plan (Condition F21(d));
 - Construction Heritage Management Plan (Condition F21(e));
 - Construction Flora and Fauna Management Plan (Condition F21(f));
 - Construction Air Quality Management Plan (Condition F21(g));
 - (Construction) Bushfire Management Plan (Condition F21(h));
 - Safety Management System (Condition G2); and
 - Operational Environmental Management Plan (Condition G11), including a Bushfire Management Plan (Condition G12).

An assessment of the environmental performance of the development, including an assessment of:

- a. Actual impacts compared to predicted impacts documented in the Environmental Assessment and associated amendments;
 - b. The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
 - c. Incidents, non-compliances and complaints that occurred or were made during the audit period;
 - d. The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
 - e. Any feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period.
- The status of implementation of previous Independent Audit findings, recommendations and actions (if any);

- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development’s past performance.

Further information regarding relevant matters raised by DPHI and other agencies are discussed within Section 3.6 of this report and have been addressed during completion of the IEA.

2.5 Audit Period

This audit covered the period from the day after the site inspection of the previous audit, i.e. 11 May 2023, to the date of the current audit site inspection, i.e. 19 March 2026.

2.6 Audit Opening and Closing Meetings

As part of the IEA program, Audit Opening and Audit Closing meetings were held as noted in Table 1, below.

TABLE 1: Audit Meeting Attendance Register

Meeting Type/ Date of Meeting	Personnel Present
Audit Opening Meeting 11 February 2026	Joshua Fitzgerald (Iberdrola – Site Manager) Michael Harrison (Air Dinkum – HSE Advisor) Parminder Kohli (Iberdrola – HSE Manager – O & M) Damien Wagner (Jacobs – Project Management Office Environmental Lead) Ryan Ellis (Iberdrola – Site Technician) Nelson Mckie (Iberdrola – Site Technician) Toby Hobbs (Vantage Environmental Management – Lead Auditor) Susannah Price (Vantage Environmental Management – Auditor)
Audit Closing Meeting 08 April 2026	Joshua Fitzgerald (Iberdrola – Site Manager) Michael Harrison (Air Dinkum – HSE Advisor) Parminder Kohli (Iberdrola – HSE Manager – O & M) Ryan Ellis (Iberdrola – Site Technician) Toby Hobbs (Vantage Environmental Management – Lead Auditor) Susannah Price (Vantage Environmental Management – Auditor)

3 AUDIT METHODOLOGY

3.1 Selection and Endorsement of Audit Team

The audit team was selected by the proponent and endorsed by DPHI via their correspondence of 13 January 2026, a copy of which is included within Appendix A of this report.

3.2 Independent Audit scope development

Prior to the commencement of the audit, the scope was developed in accordance with Condition E8 of the Project Approval and the *Independent Audit Post Approval Requirements* (DPIE, 2020). On 14 January 2026, Vantage issued the proposed audit scope to DPHI for comment. Correspondence from DPHI was received on 27 January 2026 which discussed the areas the Department would like focused on during the audit and which stakeholders to consult with. Further information is provided within Section 3.6 of this report.

Copies of correspondence related to consultation undertaken as part of the audit scope are presented within Appendix B of this report.

3.3 Compliance Evaluation

In order to evaluate Project compliance, the following process was followed:

- Desktop audit of the documents provided by the contractor/proponent;
- Site inspection;
- Collection of further information from the contractor/proponent as required; and
- Assessment of documents for compliance and reporting in this audit report.

3.4 Site Personnel Interviews

Discussion regarding the environmental performance of the Project were held with the personnel during the audit program:

- Josh Fitzgerald (Iberdrola – Site Manager);
- Ryan Ellis (Iberdrola – Site Technician);
- David Cox (Iberdrola – Senior Environmental Advisor);
- Piper Workman (Iberdrola – Environmental Advisor);
- Damien Wagner (Jacobs – Project Management Office Environmental Lead); and
- Mick Harrison (Air Dinkum – Health, Safety and Environmental Senior Advisor).

The site interviews provided the audit team with an opportunity to obtain relevant evidence regarding the compliance status and environmental performance of the Project to support the field and desk-based audit review process. It is noted that site personnel interviewed were most willing to assist the audit team and provided full and prompt disclosure with respect to the auditor's queries.

3.5 Site Inspections

A site inspection was undertaken by Toby Hobbs (Lead Auditor) on 19 March 2026. The purpose of the site visit was to discuss the compliance status of the Project with relevant site personnel, view environmental management records, view the status of on-site environmental controls and observe general environmental performance and Project Approval (and associated management plans and strategies) compliance for the Project.

The site visit also provided the auditor with an opportunity to obtain appropriate evidence regarding the compliance status and environmental performance of the Project to support the desk-based audit review process. It is noted that all areas of the site were accessible to the audit team at the time of the site visit.

3.6 Consultation

Consultation associated with completion of this audit involved an emailed request for comment on the environmental performance of the construction of the project to the following stakeholders:

- NSW Department of Planning, Housing and Infrastructure;
- Blayney Shire Council;
- Cabonne Council;
- NSW Environment Protection Authority (EPA);
- NSW Conservation Programs, Heritage and Regulation Group (CPHR);
- Heritage NSW;
- Civil Aviation Safety Authority;

- Orange Local Aboriginal Land Council (as Registered Aboriginal Stakeholder); and
- Community Consultative Committee.

Comments received by the above-listed stakeholders are summarised within Table 1, below, along with a reference to where each item is discussed in this audit report. In addition, the auditor spoke to personnel from NSW Conservation Programs, Heritage and Regulation Group and NSW Environment Protection Authority to further discuss their feedback. Feedback regarding the audit scope received by DPHI’s Team Leader of Compliance is also listed within Table 1.

Copies of correspondence related to consultation undertaken as part of the audit program are presented within Appendix B of this report.

TABLE 1: Summary of Agency Comments and Report Reference

Agency	Comment	Section of this report discussing the comment
NSW Department of Planning, Housing and Infrastructure (DPHI)	Review the clearing limits against the actual limits to the predicted limits	Section 4.7: Compliance Documents (construction and operation) Section 4.11: Actual versus Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs
DPHI	Review the rehabilitation/planting activities in response to the removal of <i>Eucalyptus canobolensis</i> , during initial clearing activities, and whether the project is meeting their commitments regarding the actions that they proposed to undertake and implement	Section 4.7: Compliance Documents (construction and operation) Section 4.9: Incidents Appendix C: Audit Table Appendix D: Site Inspection Photographs
DPHI	Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc	Section 4.7: Compliance Documents (construction and operation) Section 4.9: Incidents Appendix C: Audit Table
DPHI	Review the incident regarding damaged turbine WTG22 and whether the notifications/actions/exclusion zones etc, regarding the management of the incident was adequate and whether there are any recommendations regarding future incidents of this type and/or revisions of management plans	Section 4.7: Compliance Documents (construction and operation) Section 4.9: Incidents Appendix C: Audit Table Appendix D: Site Inspection Photographs
DPHI	Review Bird and Bat Monitoring and ensure recommendations/improvements are being implemented as per the bird and bat adaptive management program to reduce any impacts	Section 4.7.1: Bird and Bat Adaptive Management Plan Appendix C: Audit Table
DPHI	Review the project is managing and implementing the requirements for: <ul style="list-style-type: none"> • Traffic and Road impacts • Noise & Vibration impacts • Visual & Lighting Impacts • Shadow Flicker 	Section 4.7: Compliance Documents (construction and operation) Section 4.11: Actual versus Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table

Agency	Comment	Section of this report discussing the comment
NSW Conservation Programs, Heritage and Regulation Group (CPHR)	Include an assessment of the annual BBMP reports and associated correspondence, and whether the appropriate approval conditions are being met.	Section 4.7.1: BBAMP Appendix C: Audit Table
NSW Environment Protection Authority (EPA)	Finalising regular maintenance schedules, now that the premises is operational	Section 4.3: Summary of Agency Notices, Orders, Penalty Notices or Prosecutions Section 4.7: Compliance Documents (construction and operation) Appendix C: Audit Table
NSW EPA	Ensuring timely reporting of incidents to regulators	Section 4.9: Incidents Appendix C: Audit Table Appendix D: Site Inspection Photographs
NSW EPA	Bedding in of earthworks and runoff controls	Appendix C: Audit Table Appendix D: Site Inspection Photographs
NSW EPA	Unexpected discharges of SF6 gas from electrical components and switchgear	Section 4.3: Summary of Agency Notices, Orders, Penalty Notices or Prosecutions Section 4.7: Compliance Documents (construction and operation) Appendix C: Audit Table
Blayney Shire Council	<p>The General Manager provided the following feedback:</p> <ul style="list-style-type: none"> • Significantly more vegetation and native trees were removed than necessary for the project; • The project was very prolonged and poorly planned and managed, resulting in additional, unnecessary and drawn-out impact particularly on residents closest to the towers (with an example given of road repairs). • Condition F17 required road repair works to be completed within 3 months of completion of construction • Surrounding village of Carcoar now has TV reception issues. • Intersection of Errowanbang Road and Mid Western Highway not being upgraded as required by Roads and Maritime Services (now Transport for NSW) through the Project Approval and as indicated to Council and the community that it would be. 	Section 4.7: Compliance Documents (construction and operation) Section 4.8: Complaints Section 4.11: Actual versus Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs

Agency	Comment	Section of this report discussing the comment
Community Consultative Committee (CCC)	<p>The CCC chair sent out a request to CCC members for any relevant feedback and the following is a summary of feedback received:</p> <ul style="list-style-type: none"> • There was significant concern about damage to, removal of, native vegetation along some of the access roads during the construction phase and at the on-property sites of turbine installation/construction • This damage to/removal of native vegetation included the apparent loss of, or damage to, some aboriginal heritage sites • This damage to/removal of native vegetation included loss of important hollows that are important habitat for some significant threatened bird species • There was concern about poor management of muddy/potentially contaminated water runoff from some turbine construction/installation sites. 	<p>Section 4.7: Compliance Documents (construction and operation) Section 4.8: Complaints Section 4.11: Actual versus Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs</p>
Heritage NSW	Heritage NSW requested consideration of any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans.	<p>Compliance Documents (construction and operation) Section 4.11: Actual versus Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs</p>
Cabonne Council	Advised that Council did not have any records of non-compliance or complaints for the period of April 2023 to January 2026 (as of 06 February 2023 response)	N/A
CASA	CASA replied that they did not have any comments regarding the environmental performance of the Flyers Creek Wind Farm.	N/A
Orange Local Aboriginal Land Council (OLALC)	The OLALC Assets and Projects Manager reported that he was not aware of any issues regarding environmental performance of the project from his team.	N/A

3.7 Compliance Status Descriptors

The compliance status of each Project Approval condition presented in the audit table in Appendix C has been determined in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020). The compliance status was recorded as one of the following:

- 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; or
- Not triggered – A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

It is noted that the *Independent Audit Post Approval Requirements* (DPIE, 2020) does not allow for the use of partial compliance, partial non-compliance, not verified or administrative non-compliance.

4 AUDIT FINDINGS

4.1 Approvals and Documents Audited

The following construction and operation-related approvals and documents were considered as part of this IEA:

- Project Approval for MP 08_0252 dated 14 March 2014 including:
 - Modification 1 (13 March 2015);
 - Modification 2 (14 September 2015);
 - Modification 3 (30 November 2017);
 - Modification 4 (22 August 2019); and
 - Modification 5 (15 October 2021);
- Final Layout Plans (Condition C9);
- Bird and Bat Adaptive Management Program (Condition D4);
- Biodiversity Offset Package (Condition D6);
- Design and Landscaping Plan (Condition D26);
- Compliance Tracking Program (Condition E5);
- Construction Management Plans including:
 - Construction Environmental Management Plan (Condition F20);
 - Construction Compound and Ancillary Facilities Management Plan (Condition F21(a));
 - Construction Noise and Vibration Management Plan (Condition F21(b));
 - Construction Traffic and Access Management Plan (Condition F21(c));
 - Construction Soil and Water Quality Management Plan (Condition F21(d));
 - Construction Heritage Management Plan (Condition F21(e));
 - Construction Flora and Fauna Management Plan (Condition F21(f));
 - Construction Air Quality Management Plan (Condition F21(g));
 - (Construction) Bushfire Management Plan (Condition F21(h));
- Safety Management System (Condition G2); and
- Operational Environmental Management Plan (Condition G11), including a Bushfire Management Plan (Condition G12).

4.2 Compliance Performance

There are a total of 100 conditions within the Project Approval as modified (Modifications 1-5) and all 100 conditions were assessed for environmental compliance as part of this IEA. 88 conditions were determined to be compliant, three (3) were determined to be non-compliant and nine (9) were not triggered as part of this IEA. Detailed audit outcomes are presented within Appendix C (Audit Table of Project Approval Conditions). In accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020) the audit table presents the following information:

- Project Approval condition (Approval ID);
- Project Approval requirements;
- Audit evidence collected;
- Audit findings and recommendations; and
- Compliance status.

4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

An EPA Formal Warning Letter was issued to the proponent on 29 January 2026 in relation to breaches of the Environment Protection Licence No. 21404. The letter related to an incident in March 2025 where uncontrolled discharges of SF6 gas occurred from equipment inside WTG 4.

EPA required the following actions to be undertaken:

- Implement a regular testing regime of electrical components containing SF6, including thermal or other forms of testing as recommended in the 9 April 2025 engineering assessment, by 31 March 2026; and
- Implement procedures requiring notification to the EPA of all SF6 discharges that are unexpected and not in the course of normal maintenance, by 31 March 2026.

The Auditor was provided with a copy of the letter response to EPA dated 31 March 2026 providing information regarding preventative maintenance activities, existing inspection procedures, additional inspections, completion of an engineering investigation report (including implications for inspections) and EPA notifications.

4.4 Non-compliances

There were three (3) non-compliances identified with the Project Approval conditions and associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (FCWF-IEA2-NC1):** Occupation Certificates have not been finalised for the substation and O&M facility and the 38 wind turbine generators in accordance with Infrastructure Approval Condition C11;
- **Non-compliance No. 2 (FCWF-IEA2-NC2):** Contact details were published in a local newspaper, The Western Advocate, however the date of publication was after commencement of operation, which was not in accordance with Infrastructure Approval Condition E2; and
- **Non-compliance No. 3 (FCWF-IEA2-NC3):** A turbine blade breakage, which occurred due to a lightning strike, was considered by the Department of Planning, Housing and Infrastructure (DPHI) to be a reportable incident due to the potential to cause “Material harm to the environment” (as defined in the Infrastructure Approval). The incident was not reported to DPHI immediately, in accordance with Infrastructure Approval Condition E6.

4.5 Previous Audit Outcomes

Five (5) non-compliances and nine (9) improvement opportunities were identified in the first Independent Environmental Audit (site visit completed on 10 May 2023) and discussed in the Vantage report titled “*Flyers Creek Wind Farm (MP 08_0252) Independent Environmental Audit No. 1 Report (within 1 year of the commencement of construction), Rev.1, 09 June 2023*”.

In response to the first audit findings, Iberdrola issued an Action Response Plan to DPHI on 29 June 2023 including proposed action due dates. In addition, Iberdrola provided evidence of implementation of the audit recommendations (associated with non-compliances) on 17 August 2023 and audit opportunities for improvement on 31 August 2023 to DPE in accordance with their agreed action timeframes.

Details of the first audit non-compliances and associated recommendations, improvement opportunities, actions to close out these issues and evidence of closure are discussed in Tables 2 and 3, below.

TABLE 2: Details of Non-compliances identified in Audit No. 1 (June 2023), Proponent’s response and Status of Actions

Condition No.	Independent Audit Non-Compliance	Independent Audit Recommendations	Proponent’s Proposed Action/Action Taken/Response	Status of Action at time of this audit
C2	Non-compliance No. 1 (FCWF-IEA1-NC1): One (1) individual mature Eucalyptus Canobolensis tree, required to be retained in accordance with the Construction Flora and Fauna Management Plan (CFFMP), as per condition F21(f) of the Project Approval, was cleared without approval whilst undertaking works for the power line easement corridor. DPE issued a Penalty Notice to the construction contractor, GLC, on 27 September 2022 as a result of this clearing incident.	Recommendation No. 1 (FCWF-IEA1-R1): In response to Non-compliance No. 1 all vegetation protection and exclusion measures should be reviewed on an ongoing basis to prevent a potential repeat occurrence of the clearing incident for which a Penalty Notice was issued by DPE.	GLC (as PC) will review the protection and exclusion measures implemented for all all habitat features to be avoided and, where required, new and/or additional measures will be implemented. GLC (as PC) will utilise their weekly environmental inspection form and clearing permit form to ensure the maintenance of the control measures implemented. Iberdrola/Jacobs will undertake a compliance check of the implementation of the management measures outlined in the approved Construction Fauna and Flora Management Plan.	Proposed Action Due Date: 17 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 17 August 2023 providing evidence of implementation Audit No.1 recommendations (associated with non-compliances) - Compliance Check – FCWF CCFMP, dated 17 August 2023, prepared by Jacobs
E2	Non-compliance No. 2 (FCWF-IEA1-NC2): Contact details, including a 24 hour telephone number and postal and email addresses, were not published in newspaper(s) circulating the local area prior to the commencement of construction as per the requirement of condition E2 of the Project Approval. This information was published on 19 May 2022 in the Central Western Daily and Blayney Chronicle which was after the notified date of construction commencement on 04 April 2022.	Recommendation No. 2 (FCWF-IEA1-R2): In response to Non-compliance No. 2, the publication schedule listed within condition E2 of the Project Approval should be reviewed and relevant management systems updated to ensure any future requirements are adhered to	The project team will engage with DPE to review the publication schedule within condition E2 and publish the Project's contact details in newspaper(s) circulating the local area in accordance to the reviewed schedule. The project team will review its compliance tracker quarterly to include any relevant management systems requirements to ensure any future requirements are adhered to.	Proposed Action Due Date: 17 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 17 August 2023 providing evidence of implementation Audit No.1 recommendations (associated with non-compliances)
F20	Non-compliance No. 3 (FCWF-IEA1-NC3): The format of records associated with required monitoring in accordance with the DPE-approved Construction Environmental Management Plan	In response to Non-compliance No. 3, the monitoring schedule listed within Section 10.1 of the Construction	GLC (as PC) will develop a monitoring calendar to ensure that all monitoring programs, records and documentation listed in Section 10.1 of the Construction Environmental Management Plan are conducted in accordance with the	Proposed Action Due Date: 17 August 2023 Evidence of Closure:

Condition No.	Independent Audit Non-Compliance	Independent Audit Recommendations	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
	(CEMP), as per condition F20 of the Project approval, were not consistent with the monitoring checklist template in the CEMP and in some instances monitoring of required items was not documented. As such, it could not be confirmed that all required CEMP and Sub-plan monitoring had been undertaken at the time of the audit	Environmental Management Plan should be reviewed to ensure all required monitoring programs, inclusive of documentation, are conducted on an on-going basis	approved management plan. GLC will allocate personnel and subconsultants nominated to ensure frequency and suitable coverage is implemented. GLC (as PC) will review their weekly environmental inspection form to ensure the weekly inspections and respective recordings cover all requirements outlined within the approved management plan. Iberdrola/Jacobs will undertake a compliance check of the implementation of the management measures outlined in the approved Construction Environmental Management Plan.	- Iberdrola letter to DPE dated 17 August 2023 providing evidence of implementation Audit No.1 recommendations (associated with non-compliances) - Compliance Check – FCWF CEMP, dated 17 August 2023, prepared by Jacobs
F21 (b)	Non-compliance No. 4 (FCWF-IEA1-NC4): Records associated with required monitoring following receipt of noise complaints in accordance with the DPE-approved Construction Noise and Vibration Management Plan, as per condition F21(b) of the Project approval, and associated Noise Monitoring Protocol were not available at the time of the audit; as such, it could not be confirmed if all required monitoring had been undertaken at the time of the audit	Recommendation No. 4 (FCWF-IEA1-R4): In response to Non-compliance No. 4, the monitoring associated with post-complaint follow-up as presented with the Noise Monitoring Protocol of the Construction Noise and Vibration Management Plan should be reviewed and the required monitoring program, inclusive of documentation, instigated as soon as practicable	The Complaint Management Plan will be reviewed to ensure that noise complaints received by Iberdrola are communicated with applicable construction stakeholders as soon as practicable. Iberdrola/Jacobs will undertake a compliance check of the implementation of the management measures outlined in the approved Construction Noise and Vibration Management Plan. GLC (as PC) will allocate personnel and subconsultants nominated to ensure that monitoring is conducted following the receipt of noise complaints, in accordance with the approved Construction Noise and Vibration Management Plan. GLC (as PC) will develop a noise complaints tracker to ensure that noise complaints and respective noise monitoring reports and action plan are monitored and documented in accordance with the approved management plan.	Proposed Action Due Date: 17 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 17 August 2023 providing evidence of implementation Audit No.1 recommendations (associated with non-compliances) - Compliance Check – FCWF CNVMP, dated 17 August 2023, prepared by Jacobs (including noise and vibration monitoring reports)
F21 (d)	Non-compliance No. 5 (FCWF-IEA1-NC5): The format of records associated with required monitoring in accordance with the Construction Soil and Water Quality Management Plan (CSWQMP), as per condition F21(d) of the Project approval, were not consistent with the requirements of the CSWQMP and in some instances monitoring of required items was not documented. As such, it could not be confirmed that all required monitoring had been undertaken at the time of the audit. Following two (2) incidents related to	Recommendation No. 5 (FCWF-IEA1-R5): In response to Non-compliance No. 5, the monitoring schedule listed within Section 8.1 of the Construction Soil and Water Quality Management Plan should be reviewed and the required monitoring program, inclusive of documentation, instigated as soon as practicable. All required measures	GLC (as PC) will develop a monitoring calendar to ensure all monitoring programs, records and documentation, listed within Section 8.1 of the Construction Soil and Water Quality Management Plan are conducted in accordance with the approved management plan. GLC will allocate personnel and subconsultants nominated to ensure frequency and suitable coverage is implemented. GLC (as PC) will review their weekly environmental inspection form to ensure the weekly inspections and respective recordings cover all requirements outlined within the approved management plan and the measures	Proposed Action Due Date: 17 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 17 August 2023 providing evidence of implementation Audit No.1 recommendations (associated with non-compliances) - Compliance Check – FCWF CSWQMP, dated 17 August 2023, prepared by Jacobs

Condition No.	Independent Audit Non-Compliance	Independent Audit Recommendations	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
	erosion/sedimentation issues, non-compliance with the CSWQMP was formally reported to DPE. In addition, following reporting of erosion/sedimentation issues to the NSW EPA, Project EPL was varied to require implementation of a Pollution Reduction Program related to the management of potential erosion and sedimentation risks	associated with the EPA mandated Pollution Reduction Program should also be instigated following the reported non-compliances of February 2023 related to erosion and sedimentation issues	associated with the EPA mandated Pollution Reduction Program. GLC (as PC) will review their monitoring forms to ensure the monitoring program and respective recordings cover all requirements outlined within the approved management plan. Iberdrola/Jacobs will undertake a compliance check of the implementation of the management measures outlined in the approved Construction Soil and Water Quality Management Plan.	

TABLE 3: Details of Opportunities for Improvement identified in Audit No. 1 (June 2023), Proponent's response and Status of Actions

Condition No.	Independent Audit Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
D10	Opportunity for Improvement No. 1: Install temporary bunding for capture of potential fuel spillage at vehicle/equipment fill point adjacent to the on-site fuel storage area.	GLC (as PC) will review the environmental controls within the vehicle/equipment fill point adjacent to the onsite fuel storage areas and, where required, controls will be implemented to capture potential fuel spillage. Appropriate signage will be installed in the area and measures implemented will be communicated in toolbox to increase awareness amongst contractors. GLC (as PC) will capture performance of the control measures implemented in their weekly environmental inspection form.	Proposed Action Due Date: 31 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement
D29	Opportunity for Improvement No. 2: Some co-mingling of waste within skip bins and overfilling of skip bins was noted during the audit site inspection. It is suggested that additional focus is placed on sorting of waste streams and the sizing of skip bins is optimised to ensure adequate capacity.	GLC (as PC) has investigated and will implement additional measures to prevent overfilling of skip bins and co-mingling of waste (e.g. increasing the frequency of waste removal, optimisation of size/quantity of skip bins etc.). Waste segregation was discussed in the pre-start meeting on 8th June 2023 to increase awareness of onsite personnel on waste management procedures, including adequate separation of waste streams. GLC (as PC) will develop a monitoring calendar to ensure waste management procedures are implemented throughout the site and in accordance with the approved management plan. GLC will allocate personnel and subconsultants nominated to ensure frequency and suitable coverage is implemented. GLC (as PC) will capture performance of waste management onsite in their weekly environmental inspection.	Proposed Action Due Date: 31 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement
D31	Opportunity for Improvement No. 3: Review Waste Register and update as necessary with all required information within Waste Management Protocol	GLC (as PC) will review procedures in place to ensure the Waste Register contains the information required in the Waste Management Protocol within approved Construction Environmental Management Plan, including: - recording off-site waste disposal and recycling (i.e. type, quantities, destination) using the waste register or the EPA online trackable waste system for any wastes classified as restricted or hazardous; and	Proposed Action Due Date: 31 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement

Condition No.	Independent Audit Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
		<p>- collection and filing of dockets and manifests recording the date of waste removal and identifying waste transport contractor and fate of waste taken from site.</p> <p>GLC (as PC) will develop a monitoring calendar with allocated personnel to ensure that the Waste Register is updated and relevant recordings are documented in accordance with the approved management plan.</p>	
E3	<p>Opportunity for Improvement No. 4: Due to the relatively high number of complaints received on the project it is suggested that additional training for Project personnel could be conducted to focus on minimising the impacts of construction. Key areas for improvement, based on the nature of complaints already received, could include traffic management and interactions with neighbouring properties.</p>	<p>GLC (as PC) will review and implement additional measures (e.g. toolbox talks, prestart meetings etc.) to raise Project personnel awareness on minimising environmental impacts associated to the construction, including traffic management and interaction with neighbouring properties.</p> <p>GLC will develop and implement a training matrix calendar with 6-months overview comprising the key areas of improvements, based on the topics raised in community complaints, associated with the construction activities being undertaken in the Project.</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
E11	<p>Opportunity for Improvement No. 5: The CEMP and all required management plans should be updated to include references to MOD 5 (15 Oct 2021) where relevant and a register developed to document review and any associated updates. The Revision History table in plans was noted to be blank at the time of the audit and, as such, should be completed as part of upcoming revision.</p>	<p>GLC (as PC) will review all required management plans to include references to MOD 5 (15 October 2021), where relevant, and update the Revision History table accordingly.</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F12	<p>Opportunity for Improvement No. 6: In some instances, environmental controls associated with management of potential erosion and sedimentation risks were noted to either require maintenance or removal if redundant. Erosion/sedimentation controls should be reviewed on an on-going basis to ensure required maintenance is conducted and where controls are no longer deemed necessary they should be removed. In addition, Project-based resources such as mulch generated from vegetation clearing could be used for management of potential erosion and sedimentation risks.</p>	<p>GLC (as PC) will develop a monitoring calendar to ensure the monitoring program is aligned with the approved Construction Soil and Water Quality Management Plan. GLC will allocate personnel and subconsultants nominated to ensure frequency and suitable coverage is implemented.</p> <p>GLC (as PC) will capture performance of the erosion and sedimentation control measures implemented in their weekly environmental inspection form.</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(d)	<p>Opportunity for Improvement No. 7: Some evidence of mud-tracking/drag-out was noted from Project access points onto Panuara Road and</p>	<p>GLC (as PC) has implemented additional measures to control potential mud-tracking from Project access points, including cattle and shaker grids, gabion rock, restriction of vehicle access in high-risk areas during</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure:</p>

Condition No.	Independent Audit Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
	Errowanbang Road at the time of the audit site inspection. Additional measures to control potential mud-tracking such as sealing of gate areas, installation of shaker grids and routine street-sweeping should be considered if this issue continues to be observed.	rain events, and availability of a street sweeper full time onsite. In addition, mud-tracking and respective control measures have been communicated in morning pre-starts to increase awareness amongst site personnel and contractors. GLC (as PC) will develop a monitoring calendar to ensure monitoring is aligned with the approved Construction Soil and Water Quality Management Plan with allocated GLC and subconsultants nominated to ensure frequency and suitable coverage is implemented. GLC (as PC) will capture performance of mud-tracking control measures in their weekly environmental inspection form.	- Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement
F21(e)	Opportunity for Improvement No. 8: <ul style="list-style-type: none"> "Housekeeping" is required on temporary fencing around some Heritage sites through linking of all fencing panels and arrangement in an orderly fashion; 	GLC (as PC) will review the temporary fencing of all Heritage sites and, where required, housekeeping will be improved through linking of all fencing panels and arrangement in an orderly fashion. GLC will utilise their weekly environmental inspection form to document the implementation of this control measures.	Proposed Action Due Date: 31 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement
F21(e)	<ul style="list-style-type: none"> Suitable signage was observed on some temporary fences around heritage sites, but could be improved through consistent wording on professional printed signs; 	GLC (as PC) will review signage on all temporary fences around heritage sites and, where required, the signage will be improved through consistent wording on professional printed signs. GLC will utilise their weekly environmental inspection form to document the implementation of this control measures.	Proposed Action Due Date: 31 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement
F21(e)	<ul style="list-style-type: none"> Improved signage alerting personnel to the presence of an unfenced heritage site more than 50 metres from the Project track is warranted at the Old Hut site, FCWF-S-06 and other heritage sites close to tracks; 	GLC (as PC) will improve the signage at the Old Hut site, FCWF-S-06 and other heritage sites located close to tracks to alert personnel to the presence of an unfenced heritage site. The signage will be placed within more than 50 metres from the Project track. GLC will utilise their weekly environmental inspection form to document the implementation of this control measures.	Proposed Action Due Date: 31 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement
F21(e)	<ul style="list-style-type: none"> Discarded or redundant green barrier fencing materials should be removed from heritage sites, e.g. at FCWF-S-04; 	GLC (as PC) will review fencing in place for all heritage sites and, where required, remove green barrier fencing materials (e.g. if discarded or redundant). GLC will utilise their weekly environmental inspection form to document the implementation of this control measures.	Proposed Action Due Date: 31 August 2023 Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement

Condition No.	Independent Audit Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
F21(e)	<ul style="list-style-type: none"> A live register of all heritage investigations should be maintained as part of the CHMP; 	<p>GLC (as PC) will develop a live register of all heritage investigations and heritage sites discovered, including AHIMS site numbers of recorded aboriginal sites.</p> <p>All newly unexpected sites will be uploaded to the AHIMS database by GPC (as PC) and will be reflected in the live register maintained by the PC.</p> <p>GLC (as PC) will develop a monitoring calendar to ensure the monitoring of heritage sites and respective recordings are aligned with the approved Construction Heritage Management Plan. GLC will allocate personnel and subconsultants nominated to ensure frequency and suitable coverage is implemented.</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(e)	<ul style="list-style-type: none"> A live register of all heritage sites should be maintained as part of the CHMP with verification of AHIMS registration through a search of the AHIMS register at the time of CHMP review; 	See response above.	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(e)	<ul style="list-style-type: none"> The above should be included in an annual review of the CHMP in accordance with CHMP section 8.3; 	GLC (as PC) will review the reporting and record keeping requirements within the Construction Heritage Management Plan as part of its annual review to ensure the ongoing maintenance of the live register.	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(e)	<ul style="list-style-type: none"> The CHMP contact details for the relevant NSW Government regulatory agency need to be updated in CHMP Appendix D; 	GLC (as PC) will update the contact details for the relevant NSW Government regulatory agency in the Appendix D of the Construction Heritage Management Plan.	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(e)	<ul style="list-style-type: none"> Recorded Aboriginal sites should be registered with the Heritage NSW Aboriginal Heritage Information Management System (AHIMS) no later than one month after discovery, and all AHIMS site numbers noted in the live CHMP document; and 	GLC (as PC) will review the procedures in place to ensure that recorded Aboriginal sites are registered with the Heritage NSW AHIMS no later than two (2) months after discovery.	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>

Condition No.	Independent Audit Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
	<ul style="list-style-type: none"> Heritage maps in GIS systems should be updated and physical maps displayed in relevant Project facilities should be replaced at least quarterly. 	<p>GLC (as PC) will develop a calendar and allocate personnel to ensure Heritage maps in GIS systems are updated and physical maps displayed in Project's facilities are replaced on a quarterly basis.</p> <p>GLC will utilise their environmental inspection form to document the implementation of this control measures.</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(f)	<p>Opportunity for Improvement No. 9:</p> <ul style="list-style-type: none"> <i>Update mapping of native vegetation and clearing data.</i> The mapped cleared areas need to include the full extent of land disturbance, particularly in areas of native vegetation. The disturbance needs to include the direct vegetation clearing for turbine pads, access tracks and cable routes, as well as disturbance associated with construction and revegetation of batters and drains/culverts; 	<p>GLC will update mapping of native vegetation and clearing data to include the full extent of land disturbance, including in areas of native vegetation. The disturbance data will comprise the direct vegetation clearing for turbine pads, access tracks and cable routes, and disturbance associated with construction and revegetation of batters and drains/culverts.</p> <p>GLC (as PC) will develop a monitoring calendar to ensure the ongoing maintenance of the mapping of native vegetation and clearing data. GLC will allocate personnel and subconsultants nominated to ensure frequency and suitable coverage is implemented.</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(f)	<ul style="list-style-type: none"> <i>Fencing.</i> Improve fencing and demarcation of environmentally sensitive areas (e.g. Box-Gum Woodland). Areas to be retained should be fully fenced to minimise the risk of accidental clearing, or accidental disturbance by construction machinery; 	<p>GLC will review fencing and demarcation of environmentally sensitive areas (e.g. Box-Gum Woodland) and, where required, areas to be retained will be fully fenced to minimise the risk of accidental clearing, or accidental disturbance by construction machinery.</p> <p>GLC will utilise their weekly environmental inspection form to document the implementation of this control measures</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(f)	<ul style="list-style-type: none"> <i>Rehabilitation Plan.</i> Specific details on rehabilitation in the form of a Rehabilitation Plan as described in the CFFMP. The rehabilitation needs to consider the varying landscapes and condition of previously mapped vegetation. The use of hydromulch with winter pasture blend is not recommended in areas previously containing a native grassy understorey. The pasture blend has the potential to prevent the successful re-establishment of native grassland. Some areas of Box-Gum Woodland EEC contain a native grassy understorey, while others are exotic pasture. These areas need to be accurately mapped and included in the Rehabilitation Plan; 	<p>GLC is developing and will implement a Rehabilitation Plan detailing the rehabilitation strategy and management measures, aligned with the approved Construction Fauna and Flora Management Plan. The Rehabilitation Plan will consider the varying landscapes and condition of previously mapped vegetation, including the identification of areas of Box-Gum Woodland EEC containing native grassy understorey and areas of Box-Gum Woodland EEC containing exotic pasture, to inform the adequate revegetation method.</p> <p>GLC will utilise their weekly environmental inspection form to document the implementation of the Rehabilitation Plan.</p>	<p>Proposed Action Due Date: 31 August 2023</p> <p>Evidence of Closure: - Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(f)	<ul style="list-style-type: none"> <i>Monitoring.</i> Improve details on monitoring as described in the Conditions of Consent is 	<p>GLC will review the monitoring requirements within the Conditions of Consent, including performance indicators (e.g. for rehabilitation or weed cover),</p>	<p>Proposed Action Due Date: 31 August 2023</p>

Condition No.	Independent Audit Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
	<p>recommended. Monitoring details are limited within the CFFMP, other than stating that monitoring would be completed and the broad objectives and targets in Section 1.5 (Table 1), which are mostly relating to incidents, inductions and compliance with approvals. For example, there are no details on performance measures (e.g. for rehabilitation or weed cover) and how monitoring actions will be implemented and what happens if performance measures are not met;</p>	<p>measures for the rectification of non-compliances and record keeping requirements and capture in the Rehabilitation Plan being currently developed by GLC.</p> <p>GLC will utilise their weekly environmental inspection form to document the implementation of this control measures.</p>	<p>Evidence of Closure:</p> <p>- Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(f)	<ul style="list-style-type: none"> <i>Weed Management Control.</i> Improved details and emphasis on weed management control is required. Several invasive and prohibited weeds were identified during the site inspection in areas adjoining current construction and on rehabilitated areas. Left uncontrolled these weeds have the potential to affect rehabilitation success, and spread further into adjoining undisturbed land, including Box-Gum Woodland EEC. Considering the agricultural nature of the project area, there is a risk that most topsoil, even from areas with a native grassy understorey will have high weed loads. When this topsoil is re-spread after stockpiling and conditions are right (e.g. seasonal rain), weed cover has the potential to establish quickly preventing native species growth; 	<p>GLC (as PC) will review the weed management within the Construction Flora and Fauna Management Plan to provide further details on measures for early identification of invasive weed; implementation of weed management controls (considering the varying landscapes and condition of previously mapped vegetation); and monitoring and record keeping requirements. This will be captured in the Rehabilitation Plan being currently developed by GLC.</p> <p>GLC (as PC) will inspect all construction and on rehabilitated areas and, where required, weed control measures will be implemented to manage invasive and prohibited weed adjoining these areas.</p> <p>GLC will utilise their weekly environmental inspection form to document the implementation of this control measures.</p>	<p>Proposed Action Due Date:</p> <p>31 August 2023</p> <p>Evidence of Closure:</p> <p>- Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(f)	<ul style="list-style-type: none"> <i>Woody debris.</i> Minor branches and leaves can be mulched and utilised in areas of high erosion risk (e.g. steep slopes) to reduce raindrop impact and assist in slope stabilisation. Stockpiled woody debris such as major branches and trunks could be placed on revegetated batter slopes to assist in long-term stability by slowly overland flow and capturing fine particulate matter, subject to landholder agreement; and 	<p>GLC (as PC) will utilise, where appropriate, woody debris in areas of high erosion risk (e.g. steep slopes) to reduce raindrop impact and assist in slope stabilisation. The use of stockpiled woody debris on revegetated batter slopes to assist in long-term stability, such as major branches and trunks, will be investigated and, if feasible, implemented upon landholders' agreement. This will be captured in the Rehabilitation Plan being currently developed by GLC.</p> <p>GLC will utilise their weekly environmental inspection form to document the implementation of this control measures.</p>	<p>Proposed Action Due Date:</p> <p>31 August 2023</p> <p>Evidence of Closure:</p> <p>- Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>
F21(f)	<p><i>Biodiversity Offset Package.</i> Expediting the Biodiversity Offset Package to ensure compliance with reuniting the offset liability within 2 years of start of</p>	<p>Iberdrola have explored options to establish a local BSA, but were unable to establish a site at this stage. Instead, Iberdrola have commissioned an expert</p>	<p>Proposed Action Due Date:</p> <p>31 August 2023</p> <p>Evidence of Closure:</p>

Condition No.	Independent Audit Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Status of Action at time of this audit
	<p>construction of the project. Acquitting a project credit liability through a Biodiversity Stewardship Site Agreement (BSA) is typically an 18-to-24-month exercise. Payment into the Biodiversity Conservation Fund (BCF) and/or purchasing credits on the open market can be done relatively quickly, but is typically a much more expensive option and not favoured when there is a high credit liability.</p>	<p>consultancy to assist us with retiring our offset liability through independent suppliers and the BCF.</p> <p>Credits will be retired in advance of April 2024.</p> <p>Update on the progression of retiring the Projects offset liability through independent suppliers and the BCF will be provided.</p>	<p>- Iberdrola letter to DPE dated 31 August 2023 providing evidence of implementation of Audit No.1 opportunities for improvement</p>

4.6 Compliance Documents

The Project Approval for the Project required that specific post approval documents be prepared and submitted to the Department prior to the commencement of construction or operation. As part of this audit, the following post approval documents were assessed to determine if they had been developed and implemented in accordance with the conditions of consent and their content was generally adequate:

- Bird and Bat Adaptive Management Program (Condition D4);
- Biodiversity Offset Package (Condition D6);
- Design and Landscaping Plan (Condition D26);
- Compliance Tracking Program (Condition E5);
- Construction Management Plans including:
 - Construction Environmental Management Plan (Condition F20);
 - Construction Compound and Ancillary Facilities Management Plan (Condition F21(a));
 - Construction Noise and Vibration Management Plan (Condition F21(b));
 - Construction Traffic and Access Management Plan (Condition F21(c));
 - Construction Soil and Water Quality Management Plan (Condition F21(d));
 - Construction Heritage Management Plan (Condition F21(e));
 - Construction Flora and Fauna Management Plan (Condition F21(f));
 - Construction Air Quality Management Plan (Condition F21(g));
 - (Construction) Bushfire Management Plan (Condition F21(h));
- Safety Management System (Condition G2); and
- Operational Environmental Management Plan (Condition G11), including a Bushfire Management Plan (Condition G12).

Both construction and operation post approval documents were reviewed as part of this audit. The first Independent Environmental Audit, completed in May 2023 following commencement of construction, reviewed construction-related documents and this audit focuses on operation-related documents and any amendments to construction-related documents.

The adequacy of the documents was determined on the basis of whether there were any non-compliances resulting from the implementation of the document or whether there were any opportunities for improvement. A technical review of the documents was not undertaken as part of this audit.

4.6.1 Bird and Bat Adaptive Management Program

The Bird and Bat Adaptive Management Program (BBAMP) was prepared by Nature Advisory and the most recent version viewed as part of this audit was Revision 4.7 dated July 2025 to satisfy Condition D5. This revision of the BBAMP has been submitted to the Planning Secretary, however re-approval had not been issued at the time of issue of this report.

A previous revision of the BBAMP was prepared by Nature Advisory (Revision 4.6 dated January 2020) and approved by the Planning Secretary on 14 February 2020, prior to operation.

The auditor considers the BBAMP has been generally developed in accordance with the Project Approval conditions and relevant approvals and that the content is generally adequate.

Further information regarding the implementation of the BBAMP (including monitoring) is provided in the Independent Audit Table in Appendix C.

It is noted that, following issue of the BBAMP annual report for May 2024 to April 2025, CPHR made several recommendations which Iberdrola considered and implemented. The auditor also spoke to a Senior Conservation Planning Officer at CPHR who has been in regular communication with Iberdrola (and receiving monthly reports) and is pleased at the level and openness of communication with the proponent.

In addition, the auditor notes that Iberdrola have completed additional environmental initiatives outside of the BBAMP and Project Approval conditions including:

- Additional monitoring between December 2023 and April 2024 during commissioning;
- Ongoing collaboration with UNSW which will include a field study on bird and flying foxes which will be used to inform the siting, construction and operation of wind energy facilities with minimal biodiversity impacts; and
- Worked with their ecological consultant to improve and connect habitat for the threatened squirrel glider at the site, including installation of 25 squirrel glider boxes, design and installation of glider pole and a rope, and planting of 1,200 tubestock seedlings.

4.6.2 Biodiversity Offset Report

The Biodiversity Offset Report (BOR) was prepared by NGH Consulting and the most recent version viewed as part of this audit was Revision Final V.1.2 dated 19 October 2021 to satisfy Condition D5. The BOR was approved by the Planning Secretary on 15 July 2022, prior to commencement of construction.

The Auditor notes that all biodiversity credits were retired within 2 years of the commencement of construction, i.e. prior to 04 April 2024 and the credits were retired by a mix of direct payment into the Biodiversity Conservation Trust and to individual vendors with existing biodiversity stewardship sites.

Further information regarding the BOR is discussed in the Audit Table in Appendix C.

4.6.3 Design and Landscaping Plan

The Design and Landscaping Plan (DALP) was initially prepared by Nacap to satisfy Condition D26 and the most recent version viewed as part of this audit was Revision F dated 25 August 2023, updated by Iberdrola. The DALP (Revision F) was approved by the Planning Secretary on 25 November 2024 and incorporated the final substation and switching station plans approved by the Secretary.

Revision E (dated 12 August 2020) of the DALP was approved by the Planning Secretary on 08 September 2020, prior to commencement of construction.

The DALP was developed in consultation with Blayney Shire Council and Cabonne Council as discussed in Section 1.4 and Appendix A of the DALP.

The auditor considers the DALP was developed in general accordance with the Project Approval conditions and relevant approvals and that the content was adequate and generally being implemented on site.

Further information regarding the implementation of the DALP is provided in the Independent Audit Table in Appendix C.

4.6.4 Compliance Tracking Program

The Compliance Tracking Program (CTP) was prepared by Arcadis and the most recent version viewed as part of this audit was Revision 2 dated 23 September 2021 to satisfy Condition E5. The CTP was approved by the Planning Secretary on 24 September 2021, prior to commencement of construction.

An update to the CTP (Revision 3) is underway to make it the CTP more relevant to the operational phase of the project.

Further information regarding the implementation of the CTP is provided in the Independent Audit Table in Appendix C.

4.6.5 Construction Management Plans

Construction management plans for the project (including associated condition) included:

- Construction Environmental Management Plan (Condition F20);
- Construction Compound and Ancillary Facilities Management Plan (Condition F21(a));
- Construction Noise and Vibration Management Plan (Condition F21(b));
- Construction Traffic and Access Management Plan (Condition F21(c));
- Construction Soil and Water Quality Management Plan (Condition F21(d));
- Construction Heritage Management Plan (Condition F21(e));
- Construction Flora and Fauna Management Plan (Condition F21(f));
- Construction Air Quality Management Plan (Condition F21(g));
- (Construction) Bushfire Management Plan (Condition F21(h));

The auditor considers the construction-related management plans were developed and implemented in general accordance with relevant Project Approval conditions and that the content was appropriate.

Further information regarding the implementation of the Construction Management plans is provided in the Independent Audit Table in Appendix C.

4.6.6 Safety Management System

An internal memo regarding the Safety Management System was prepared by Iberdrola in October 2024, at least 2 months prior to commissioning, to satisfy Condition G2. The memo checked the compliance of the requirements of the *Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'* and the requirements of this condition, with the existing FCWF Work Health and Safety Management Plan.

4.6.7 Operational Environmental Management Plan (including a Bushfire Management Plan)

The Operational Environmental Management Plan was prepared by Iberdrola and the most recent version viewed as part of this audit was Revision 01 dated 19 May 2025 to satisfy Condition G11. The OEMP was conditionally approved by the Planning Secretary on 06 June 2025, prior to commencement of operation. For non-conditional approval, the Department required revision and resubmission of the Bird and Bat Adaptive

Management Program (BBAMP), in consultation with CPHR, by 29 August 2025. The Proponent confirmed that a revised BBAMP was submitted to the Department on 11 July 2025 to meet this condition.

The auditor considers the OEMP has been generally developed in accordance with the Project Approval conditions and relevant approvals and that the content is generally adequate. Further information regarding the compliance and implementation of the OEMP, including a discussion of the requirements of relevant sub-conditions, is provided in the Independent Audit Table in Appendix C.

4.7 Environmental Performance

Based on the review of activities undertaken during the current audit program, it is considered that the mitigation measures detailed in the DPHI-approved Construction Management Plans and Operational Environmental Management Plan, as well as other strategies and plans required within the Project Approval, were appropriate and being effectively implemented to assist in minimising impacts associated the Project.

Key environmental protection measures observed during the site visit included:

- A high standard of landscaping, drainage and road finishing work were noted at the time of the audit site visit. Plantings were noted to be healthy and showing vigorous growth. Significant re-profiling, top-soiling and mulching were also evident that assisted in noted rehabilitation outcomes;
- Key Project information was on prominent and easily accessible display at the entrance to the O&M Facility office. Information included relevant policies and procedures as well as incident management protocols and environmental sensitivity maps. Information was of an excellent standard with a strong focus on compliance and environmental best-practice;
- Bunded Dangerous Good storage cabinets and containers were present within the O&M Facility. All materials were very well organised and catalogued with SDS's present;
- Posting of signage with Project personnel contact information;
- Appropriately stocked and secured spill kits were present at the O&M site;
- Required fighting resources were present at the O&M Facility and point of connect site. Project personnel confirmed that there was on-going liaison with RFS all their requirements had been met, including provision of access at any time;
- Well established asset protection zones were noted at all viewed infrastructure locations during the audit site visit;
- Night lighting was noted to be actively monitored to reduce potential light spill;
- Boundary fencing was in place to ensure the surveyed project limits were not exceeded;
- Required exclusion zones and demarcation for environmentally sensitive areas were noted to be in place; and
- Fauna crossing infrastructure was present to form part of the habitat enhancement program that was implemented following the *Eucalyptus Canobolensis* clearing incident that occurred in 2022 during construction of the project.

4.8 Complaints

All complaints received during the audit period were detailed in the Project Complaints Register which provides the following information:

- Date of complaint;
- Mode of complaint, i.e. phone/email/SMS/in-person/pre-start/Council/contractor;
- Nature of complaint;

- Response and action taken (including updates as required); and
- Close-out status.

A total of 57 complaints were received during the construction phase of the current audit period.

The majority of the complaints (49) were in regard to traffic concerns including:

- Construction personnel not leaving gates how they found them while passing through, i.e. in an open or closed position to allow or stop transit of livestock; and
- Unsafe driving including light and heavy vehicle speeding and heavy braking.

The remainder of the complaints (8) were in regard to the following issues:

- Construction and turbine noise – four (4) complaints;
- Dust, visual amenity, construction lighting and tree removal – one (1) complaint each.

The Complaints Register indicated that all the 57 complaints received during the construction phase had been closed out.

A total of 91 complaints were also received regarding degraded TV reception upon commissioning of the wind turbines, mostly in the region of Carcoar Village. In accordance with the requirements of Condition G4, Iberdrola implemented a program to offer residents (within five kilometres of a wind turbine and also, additionally to all residents of Carcoar Village) a VAST system, which included a roof mounted satellite dish and set top box, or compensation. Iberdrola are also undertaking a long-term solution of constructing a new TV-rebroadcast tower, which is expected to fully rectify terrestrial TV signal.

At the time of the preparation of this report:

- 57 residents had VAST systems installed;
- 20 residents received compensation in lieu of VAST;
- 13 residents did not want VAST or compensation;
- One (1) resident was awaiting their VAST set-top box due to intending to replace their roof
- Construction of the new TV-rebroadcast tower was on track to be commissioned in November 2026 with a Development Application approved by Blayney Shire Council and procurement underway.

Further information is provided in the Independent Audit Table in Appendix C.

Based on the information obtained during the audit, it is considered that an appropriate complaints management and handling system is in place for the Project.

It is noted that the Project website (<https://www.iberdrola.com.au/our-assets/asset-map/operating-renewable-energy-assets/flyers-creek-wind-farm>) provides contact information to allow for members of the community to provide feedback or make a complaint such as phone number, postal address and email address.

4.9 Incidents

No reportable environmental incidents, in accordance with Project Approval Condition E6, were recorded by the Proponent during the audit period. However, DPHI issued correspondence to the Proponent regarding a potential reportable incident, where WTG 22 suffered damage to one of the blades. DPHI considered that the incident should have been reported as it threatened to cause “Material harm to the environment” as defined in the Project Approval. Because this incident was not reported immediately to the Department, it is therefore deemed to be a non-compliance with Condition E6 as discussed in Section 4.4 of this report.

Based on the Auditor’s documentation review, interviews and site visit it is considered that, while required incident reporting to the DPHI was not immediately completed, the overall management of the incident was generally acceptable. Key measures such as monitored exclusion zones, signage and fencing were implemented. As noted in Section 5.1, it is recommended that the proponent should review the incident

reporting mechanisms provided in their Compliance Tracking Program and OEMP to ensure any future incidents of a similar nature are reported the Department, in accordance with Condition E6.

A total of 23 non-DPHI reportable environmental incidents were identified during the audit period and recorded on the Project's Incident Register as follows:

- 19 incidents related to identifying bird and bat strikes during monthly surveying;
- Three (3) incidents related to erosion and sedimentation issues following significant rain events; all of which were reported to EPA in accordance with the Project Environmental Protection Licence; and
- One (1) incident related to a minor spill of septic tank waste water.

***Eucalyptus Canobolensis* Enhancement Plan**

Following the *Eucalyptus Canobolensis* clearing incident that occurred in 2022 during construction of the Project, Iberdrola committed to a *Eucalyptus Canobolensis* Enhancement Plan at a priority management site, the Mount Canobolas State Conservation Area, which consisted of six (6) actions:

- Annual Weed Control;
- Retain all buds, fruits and seed pods at Site 1;
- Carving and installation of 'Log Hollows' from Salvaged Timber;
- Community Planting Event at Lake Canobolas;
- Educational and Awareness Raising Program and Resources; and
- Annual Reporting.

The Auditor was provided with documentation showing progress of the Enhancement Plan including Annual Reporting, a project task spreadsheet and other monitoring information. The most recent Annual Report (dated January 2026 and submitted to DPHI) provided a good level of detail as to the works completed to date, remaining works and issues, opportunities and adaptive management for the actions. The only remaining actions are scheduled weed control works.

4.10 Actual versus Predicted Environmental Impacts from Environmental Impact Statement

A detailed environmental risk assessment was undertaken in the Project Environmental Assessment (EA, Aurecon Australia Pty Ltd, Rev 1, June 2011) and the following environmental risks were identified:

- Visual;
- Flora and Fauna;
- Heritage;
- Noise and Vibration;
- Traffic;
- Safety Aspects; and
- Other Environmental Risks.

As part of this audit, specific potential impacts listed in the EA within each of the identified environmental risks areas were considered and comment provided on the actual impacts during construction and operation (see Table 3, below).

It is considered that the management strategies in place to mitigate potential construction and operations impacts are, in the majority, appropriate and the Project-related impacts observed on site were generally consistent with those identified in the EA. Table 3, below, presents a summary of audit observations associated with above-noted environmental risks.

TABLE 3: Actual verses Predicted Environmental Impacts

Potential/Predicted Impacts (as documented in EA)	Actual Impacts (as observed during audit)	Comments
VISUAL		
Visual impact on local community, perceived changes to local landscape characteristics caused by large turbines	Turbines have been set back at least 1km from neighbouring residences (both associated and non-associated) and landscape screening to be completed where necessary as part of Project design.	<p>EA, management plan and design documentation adhered to during siting of Project infrastructure.</p> <p>Non-reflective materials and off-white/grey colours used on wind turbines and subdued/blending visual appearance for permanent infrastructure used to minimise visual impact where possible.</p> <p>A generally high standard of work area rehabilitation was noted by the auditor, with a strong focus on stabilisation, revegetation and landscape blending.</p>
Shadow flicker exceeding the NSW Government guidelines of 30 hours per year	<p>Turbines have been set back at least 1km from neighbouring residences (both associated and non-associated).</p> <p>Modelling of shadow flicker potential indicates it will be less than 30 hours per year at neighbouring (both associated and non-associated) residences.</p>	<p>EA, management plan and design documentation adhered to during siting of project infrastructure.</p> <p>Potential shadow flicker impacts have been incorporated into siting of turbines.</p> <p>A 2026 assessment was undertaken and, for the worst-case scenario, the modelled value is less than 30 hours/annum and within other relevant parameters of 2024 guidelines.</p>
Sun reflecting off turbine blades causing annoyance to local community or distractions to drivers on local roads, visibility of associated infrastructure	Low reflective finishes on turbine blades and associated infrastructure. Turbines set back from residences and relatively sparsely located at differing elevations and aspects	<p>EA, management plan and design documentation adhered to during siting of Project infrastructure.</p> <p>Non-reflective materials and subdued colours for permanent infrastructure used to minimise glare and reflections.</p>
FLORA AND FAUNA		
Avifauna blade strike including a large number of native bird and bat deaths resulting from blade strike. Also, an ecologically significant number of threatened bird and bat species impacted by the project.	<p>A Bird and Bat Adaptive Management Plan (BBAMP) has been developed in accordance with the Project Approval conditions and relevant approvals and approved by DPHI. The Plan is being implemented at the site and required annual monitoring has been conducted.</p> <p>Further information regarding the implementation of the BBAMP (including monitoring) is provided</p>	<p>Following issue of the BBAMP annual report for May 2024 to April 2025, CPHR made several recommendations which Iberdrola considered and implemented. The auditor also spoke to a Senior Conservation Planning Officer at CPHR who has been in regular communication with Iberdrola (and receiving monthly reports) and is pleased at the level and openness of communication with the proponent.</p> <p>In addition, the auditor notes that Iberdrola have completed additional environmental</p>

Potential/Predicted Impacts (as documented in EA)	Actual Impacts (as observed during audit)	Comments
	in the Independent Audit Table in Appendix C.	<p>initiatives outside of the BBAMP and Project Approval conditions including:</p> <ul style="list-style-type: none"> • Additional monitoring between December 2023 and April 2024 during commissioning; • Ongoing collaboration with UNSW which will include a field study on bird and flying foxes which will be used to inform the siting, construction and operation of wind energy facilities with minimal biodiversity impacts; and • Worked with their ecological consultant to improve and connect habitat for the threatened squirrel glider at the site, including installation of 25 squirrel glider boxes, design and installation of glider pole and a rope, and planting of 1,200 tubestock seedlings.
Vegetation clearance including excessive clearing of native vegetation for turbines, cables and access tracks. Also, significant disturbance of native fauna habitats.	<p>Clearing was conducted within the approved disturbance footprint in accordance with the approved CEMP and CFFMP.</p> <p>Independent mapping and validation conducted by Jacobs on Iberdrola’s behalf to verify clearing confirmed that the EEC removed did not exceed 17.93 ha which was less than the approved amount of 28.1 ha.</p>	<p>Clearing was minimised through micro-siting and subsequent re-design of the construction footprint by the project team.</p> <p>Environmental protection measures were in place for construction as detailed in the DPPI-approved CEMP and CFFMP. Relevant measures associated with operation, inclusive of vegetation protection, are presented within the Operational Environmental Management Plan.</p> <p>Major branches and trunks from cleared vegetation were retained and reused for future habitat enhancement (coarse woody debris).</p> <p>A strong focus on site rehabilitation and habitat enhancement was observed during the audit.</p>
Hollow-bearing Trees (HBTs)	<p>Clearing was conducted within the approved disturbance footprint in accordance with the approved CEMP and CFFMP</p> <p>Independent mapping and validation conducted by Jacobs</p>	<p>Clearing was minimised through micro-siting and subsequent re-design of the construction footprint by the project team.</p> <p>Environmental protection measures were in place for construction as detailed in the DPPI-approved CEMP and CFFMP. Relevant</p>

Potential/Predicted Impacts (as documented in EA)	Actual Impacts (as observed during audit)	Comments
	on Iberdrola's behalf to verify clearing confirmed that the number of hollow-bearing trees (HBTs) removed did not exceed 146 which was less than the approved amount of 189.	measures associated with operation, inclusive of habitat protection, are presented within the Operational Environmental Management Plan. Hollow-bearing timber generated during clearing was salvaged and used for habitat enhancement including placement of coarse woody debris and construction of nest boxes.
HERITAGE		
Aboriginal Heritage including potential disturbance or damage to Aboriginal artefacts	No impacts observed	The Project's active and passive protection measures are considered to be effective. Opportunities for additional protection and enhancement have been implemented in consultation with Project RAP. First Nations awareness education undertaken in consultation with Project RAP.
Non-indigenous heritage including potential disturbance of Non-Indigenous heritage, primarily trig stations and mining areas	No impacts observed	The Project's active and passive protection measures are considered to be effective.
NOISE AND VIBRATION		
Construction Exceedance of construction noise limits from operation of mechanical equipment such as cranes, excavators, earth moving activities. Vibration related to construction activities, Potential that noise from construction will impact on amenity and health	Although construction occurred during the audit period, at the time of the audit site visit construction had been completed and the project was in the operational phase.	The Project's construction-related mitigation measures were considered to be generally effective.
Operation Exceedance of operational noise limits of SA EPA Wind Turbine noise guidelines Exceedance of noise limits as a result of maintenance activity	No impacts observed	Operational noise monitoring has been conducted and, during the period of testing, noise levels at WTG test locations, and ancillary infrastructure (substation) achieved the Noise Criteria applicable under the Project Approval. Strategies are in place to minimise noise generation including monitoring of

Potential/Predicted Impacts (as documented in EA)	Actual Impacts (as observed during audit)	Comments
Potential that low frequency noise from turbine operation will impact on health		<p>plant/equipment to ensure it is well maintained and operated to manufacturer's specifications.</p> <p>The auditor reviewed the Complaints Register and no operational noise complaints have been received since commencement of operation on 11 July 2025. Prior to that, three (3) operational noise complaints had been made during 2024 and had been closed out.</p>
TRAFFIC		
<p>Off-site</p> <p>Movement of oversize and over mass vehicles in the area impacting on traffic flows. Increased numbers of vehicles transporting others supplies and workers impacting traffic flow in local area. Increased traffic impacting on road safety in local area. Heavy loads causing degradation to local roads</p>	<p>Repairs to local roads have occurred and liaison with Blayney Shire Council is on-going to facilitate this.</p>	<p>A Construction Traffic and Access Management Plan was developed and implemented for the Project.</p> <p>Monitoring has been conducted to assess the implementation and effectiveness of management practices.</p>
<p>On-site</p> <p>Vehicles driving off road causing disturbance to natural habitats and causing erosion and sedimentation. Degradation of access tracks due to vehicles movements.</p>	<p>Site access roads noted to be of a generally high standard and no vehicles observed off formed tracks/work areas at time of Audit.</p> <p>Erosion and sedimentation controls were implemented in consultation with EPA during construction. Redundant controls were removed upon completion of construction and establishment of stabilised ground surface and drainage channels.</p>	<p>Construction areas have been rehabilitated to a generally high standard with a strong focus on stabilisation and revegetation.</p> <p>Monitoring has been conducted to assess the implementation and effectiveness of management practices.</p>
SAFETY ASPECTS		
There is potential for construction and operational activities to initiate a bush fire.	No construction- or operational-based activities with the potential to initiate a bush fire were	A Bushfire Management Plan has been developed in accordance with the Project Approval.

Potential/Predicted Impacts (as documented in EA)	Actual Impacts (as observed during audit)	Comments
	<p>observed during the Audit site inspection.</p> <p>Fire-fighting water is stored in on-site tanks and liaison with Rural Fire Service representatives has occurred as part of emergency planning.</p>	<p>Innovative solutions are in place to manage risks including real time electronic monitoring of firefighting water tanks.</p>
OTHER ENVIRONMENTAL RISKS		
<p><u>Soil Management</u></p> <p>Construction activities may initiate erosion of soils. Controls inadequate to minimise erosion and sedimentation</p>	<p>Erosion and sedimentation controls have been implemented in accordance with the Construction Soil and Water Management Plan.</p> <p>Additional erosion and sedimentation controls were implemented across identified high-risk areas of the site during construction.</p>	<p>A range of relevant management practices and strategies were implemented to minimise potential erosion and/or sedimentation impacts during construction. Control measures were implemented in accordance with NSW EPA directives.</p>
<p><u>Air Quality</u></p> <p>Dust and minor air emissions generated during construction phase may impact upon air quality in local area. Emissions resulting from vehicle use.</p>	<p>Vehicles maintained in accordance with manufacturer's requirements to minimise emissions.</p> <p>Reduced speed limits were in place to assist in minimising dust generation.</p> <p>Watercarts were used to assist with on-site dust suppression.</p> <p>Disturbed areas were revegetated as soon as practicable.</p>	<p>A range of relevant management practices and strategies were in place to minimise potential air quality impacts.</p> <p>Monitoring was conducted to assess the implementation and effectiveness of management practices.</p>
<p><u>Water Management</u></p> <p>Waterways impacted by sediment runoff resulting from works for tracks, cables and transmission lines crossing watercourses. Sewage effluent incorrectly managed. Spills</p>	<p>Relevant environmental controls were implemented in accordance with the Construction Soil and Water Management Plan.</p> <p>Appropriately stocked spill kits were noted to present on-site. Flame-proof and bunded storage</p>	<p>A range of relevant management practices and strategies are in place to minimise potential erosion and/or sedimentation impacts.</p> <p>The NSW EPA requested additional measures to be implemented to reduce erosion and sedimentation risks that could impact</p>

Potential/Predicted Impacts (as documented in EA)	Actual Impacts (as observed during audit)	Comments
from fuel, oil, chemicals and battery leakage.	is utilised for hazardous materials. Appropriately sized sewage effluent tanks are present on site and regular pump-out is scheduled. Real time electronic monitoring system is in place to prevent over-fill.	waterways during construction. These requests were adhered to by the proponent. An expert soil and water management consultant was retained to review and prepare required erosion and sedimentation control plans. Appropriate measures associated with sewerage effluent management and spill management were noted to be present during the audit.
Waste Management Improper management of excavated material, garbage, construction waste.	A high standard of waste sorting and management was observed on site. No evidence of dumped, buried or burned waste noted at time of Audit site visit.	A dedicated Waste Management Protocol was developed and implemented as part of the Construction Environmental Management Plan. Site-specific protocols related to waste management are contained within the Operational Environmental Management Plan. Recycling of materials is prioritised.
Water Use Use of excessive local water supplies	Evidence of on-site stormwater collection and reuse noted on site during audit site visit of 19 March 2026. An on-site potable water treatment system has been installed to reduce reliance on external resources. No leakage or uncontrolled release of potable water for on-site use observed. No on-site groundwater bores are utilised.	During construction water use was managed in general accordance with the DPHI-approved Construction Soil and Water Management Plan which focused on minimisation of water use where possible. Operation water use and requirements are discussed in appropriate detail within the Operational Environmental Management Plan.

4.11 Site Inspection

A site inspection was conducted by the Lead Auditor, Toby Hobbs, on 19 March 2026. The site was noted to be in active operation.

The weather at the time of the inspection was cloudy with intermittent rain showers and light winds. The temperature ranged from approximately 15°C to 18°C. It is noted that there had been approximately 25mm of rainfall in the 24hr period prior to the site visit (on-site weather monitoring station data). All required areas of the site were accessible to the auditor at the time of the site visit.

Evidence for the audit collected during the site inspection is presented within the column titled “Evidence Collected” in the Independent Audit Table (Appendix C). In addition, site inspection photographs are presented within Appendix D.

4.12 Site Interviews

As mentioned previously, discussions were held with the following Project personnel on 19 March 2026 as part of the site visit for the audit:

- Josh Fitzgerald (Iberdrola – Site Manager);
- Ryan Ellis (Iberdrola – Site Technician);
- David Cox (Iberdrola – Senior Environmental Advisor);
- Piper Workham (Iberdrola – Environmental Advisor);
- Damien Wagner (Jacobs – Project Management Office Environmental Lead); and
- Mick Harrison (Air Dinkum – Health, Safety and Environmental Senior Advisor).

Evidence for the audit collected during the site interviews is presented within the column titled “Evidence Collected” in the Independent Audit Table (Appendix C).

4.13 Previous Annual Review or Compliance Report Recommendations

The auditor understands that there have not been any Annual Reviews prepared for the Project during the audit period.

In accordance with Project Approval Condition E5(c), a Pre-Operation Compliance report was prepared during July 2025 and did not identify any non-compliance matters.

4.14 Key Strengths

Areas of higher performance related to environmental management during construction and operation include:

- On-going and proactive liaison with the NSW Rural Fire Service (RFS) was occurring to ensure appropriate bushfire risk management resources were in place. At the request of RFS, street address placards were attached to all site access gates to aid in ease of locality identification and RFS have been provided with master keys to access the Project site as and when needed;
- The standard of rehabilitation of construction areas across all viewed areas of the Project site was excellent. It was apparent that particular attention had been given to blending former works areas with the surrounding landscape, establishing good groundcover, extensive tree planting and robust drainage controls;
- An on-site potable water treatment system was installed to reduce reliance on external resources;
- Site personnel have been trained and resourced to manage site vegetation including weed control, and mowing/slashing;
- Adaptive management measures to reduce potential for light-spill have been implemented. These measures including the removal of dusk- and motion-sensitive lights so that lights are not inadvertently activated when unnecessary. All outside lighting can only be activated by site personnel and security lighting is of a lower intensity and height wherever possible;
- Micro-siting of permanent access tracks has occurred to reduce the need for clearing of native vegetation and/or disturbance of heritage sites;

- The design of the access road in the vicinity of a significant heritage site was optimised and configured with additional engineering features to allow for long-term protection and enhancement of the site in consultation with the site Registered Aboriginal Party (RAP);
- Site personnel have actively participated in First Nations education programs and continue to work closely with the site RAP;
- Incident response and management protocols appeared to be of a very high standard with evidence of spill response trials observed, excellent house-keeping, accurate record-keeping for Dangerous Goods and appropriate storage in place;
- Innovative and modern technological solutions are in place to optimise resource use and actively manage potential environmental risks. Such solutions involve remote, real-time monitoring of fire-fighting water tank levels, use of remote sensing equipment, accurate and high-quality record keeping, integration of multiple data management system to provide a cohesive and centralised source of relevant Project information and development of site-specific management protocols;
- The current site management team have placed a strong focus on stakeholder engagement, particularly with landowners (both associated and non-associated). Significant resources have been invested to close-out any defects and/or concerns relating to the works undertaken by the construction contractor. Relevant information regarding safety protocols has been provided to adjoining landowners and Iberdrola have also worked closely with these landowners to optimise site rehabilitation and revegetation works;
- Excellent house-keeping was evident across all viewed areas of the site. No wind-borne waste was noted to have entered adjoining properties and all Project lands that were viewed were free of surface waste. Following the completion of construction all redundant environmental controls such as silt-fencing have been removed;
- An effective habitat enhancement program has been instigated in the area of turbines T24-T27. The program includes fauna crossing infrastructure and tree planting following the *Eucalyptus Canobolensis* clearing incident that occurred in 2022 during construction of the Project. A local ecology specialist was closely involved in the design and implementation of the program and excellent outcomes were evident including an increase in squirrel glider numbers at this location. Camera footage from the fauna crossing zone can be viewed here: https://www.youtube.com/watch?v=FCGEBM_eEbw, and additional information about the enhancement program can be viewed here: <https://www.youtube.com/watch?v=c9UwulWBQOU>;
- A robust and successful revegetation program has been instigated across the Project site with excellent early-stage results evident. The Project team have committed to a tree replacement ratio of 5:1 which is higher than the requirement of 2:1. Tree stock has been sourced from local nurseries and planting supervision has been provided by appropriately qualified and experienced personnel;
- The Auditor spoke to a Senior Conservation Planning Officer at CPHR who has been in regular communication with Iberdrola (and receiving monthly reports) and they were pleased at the level and openness of communication with the site personnel; and
- The overall impacts on biodiversity observed on site were deemed consistent with Project Approval conditions, and below what was predicted by the environmental assessment (Biodiversity Offset Report) and below the approved EEC and HBT clearing limits.

The Auditor commends the proponent and site team for their strong commitment to best practice environmental management and focus not only on minimising operational impacts, but also on building good relationships with stakeholders and enhancing the environmental values of the Project site.

5 RECOMMENDATIONS

5.1 Recommendations

Based on the non-compliances identified during the audit program the following recommendations are made:

- **Recommendation No. 1 (FCWF-IEA2-R1):** Finalise obtaining Occupation Certificates for the substation and O&M facility and the 39 wind turbine generators as a priority;
- **Recommendation No. 2 (FCWF-IEA2-R2):** The compliance tracking program should be reviewed to ensure that future notification deadlines are met; and
- **Recommendation No. 3 (FCWF-IEA2-R3):** The proponent should review the incident reporting mechanisms provided in the Compliance Tracking Program and the OEMP to ensure any future incidents of a similar nature are reported the Department, in accordance with Condition E6.

5.2 Opportunities for Improvement

A total of two (2) opportunities for improvement identified with the Project Approval conditions and associated management plans and strategies reviewed during the audit program:

- **Opportunity for Improvement No. 1 (IEA2):** Liaise with Blayney Shire Council, including the General Manager, to confirm if there are any outstanding road repair items. In addition, please discuss Council's concerns regarding the removal of the road upgrade treatment for the Errowanbang Road and Mid Western Highway intersection. If any road repair items are still outstanding, they should be expedited as a priority.
- **Opportunity for Improvement No. 2 (IEA2):** During the next OEMP update, please update Section 12 (including table in Section 12.1) for clarity as there are some incorrect references to Appendix H of the FCWF BMP. In addition, please ensure correct naming of the BMP and FERP throughout Section 12 as there are currently different reference names for these plans. It is suggested that the frequency and scope of routine environmental monitoring could also be reviewed during the next OEMP update as the site is now well established and operating in a compliant manner.

6 CONCLUSION

Vantage Environmental Management Pty Ltd has conducted an Independent Environmental Audit (IEA) to assess the environmental performance and compliance status of the Flyers Creek Wind Farm (NSW Department of Planning and Environment [DPE] Application Number MP 08_0252), herein referred to as the "Project"). The IEA was a requirement of Condition E8 of the Project's Project Approval (as modified) and was conducted in accordance with DP&E's *Independent Audit Post Approval Requirements* (IAPAR, May 2020). This audit was the second IEA for the Project and commissioned three (3) years after the first audit and covered both construction and operation phases.

There were three (3) non-compliances identified with Project Approval conditions and the associated management plans and strategies reviewed during the audit program. Recommendations to address the identified non-compliances have been presented by the auditor. In addition, two (2) opportunities for improvement were identified.

A total of 57 complaints were received during the construction phase of the current audit period with the majority relating to traffic concerns. The Complaints Register indicated that all the 57 complaints received during the construction phase had been closed out.

A further 91 complaints were received regarding degraded TV reception upon commissioning of the wind turbines, mostly in the region of Carcoar Village. In accordance with the requirements of Condition G4, Iberdrola implemented a program to offer residents (within five kilometres of a wind turbine and also,

additionally to all residents of Carcoar Village) a VAST system, which included a roof mounted satellite dish and set top box, or compensation. At the time of the preparation of this report, only one (1) complaint was open with the resident delaying installation of their VAST set-top box due to their intention to replace their roof.

The proponent is also providing a long-term solution of constructing a new TV-rebroadcast tower, which is expected to fully rectify terrestrial TV signal, and commissioning is on track for November 2026, with a Development Application approved by Blayney Shire Council and procurement underway.

No reportable environmental incidents, in accordance with Project Approval conditions E6, were recorded by the Proponent during the audit period. However, DPHI issued correspondence to the Proponent regarding a potential reportable incident, where WTG 22 suffered damage to one of the blades. DPHI considered that the incident should have been reported as it threatened to cause “Material harm to the environment” as defined in the Project Approval. Because this incident was not reported immediately to the Department it is therefore deemed to be a non-compliance with Condition E6.

Many areas of high performance related to environmental management during construction and operation were observed during the audit program. These included:

- The standard of rehabilitation of construction areas across all viewed areas of the Project site was excellent. It was apparent that particular attention had been given to blending former works areas with the surrounding landscape, establishing good groundcover, extensive tree planting and robust drainage controls;
- Micro-siting of permanent access tracks has occurred to reduce the need for clearing of native vegetation and/or disturbance of heritage sites;
- The design of the access road in the vicinity of a significant heritage site was optimised and configured with additional engineering features to allow for long-term protection and enhancement of the site in consultation with the site Registered Aboriginal Party (RAP);
- Site personnel have actively participated in First Nations education programs and continue to work closely with the site RAP;
- Innovative and modern technological solutions are in place to optimise resource use and actively manage potential environmental risks. Such solutions involve remote, real-time monitoring of fire-fighting water tank levels, use of remote sensing equipment, accurate and high-quality record keeping, integration of multiple data management system to provide a cohesive and centralised source of relevant Project information and development of site-specific management protocols;
- The current site management team have placed a strong focus on stakeholder engagement, particularly with neighbouring landowners (both associated and non-associated). Significant resources have been invested to close-out any defects and/or concerns relating to the works undertaken by the construction contractor. Relevant information regarding safety protocols has been provided to adjoining landowners and Iberdrola have also worked closely with these landowners to optimise site rehabilitation and revegetation works;
- An effective habitat enhancement program has been instigated in the area of turbines T24-T27. The program includes fauna crossing infrastructure and tree planting following the *Eucalyptus Canobolensis* clearing incident that occurred in 2022 during construction of the Project. A local ecology specialist was closely involved in the design and implementation of the program and excellent outcomes were evident including an increase in squirrel glider numbers at this location;
- A robust and successful revegetation program has been instigated across the Project site with excellent early-stage results evident. The Project team have committed to a tree replacement ratio of 5:1 which is higher than the requirement of 2:1. Tree stock has been sourced from local nurseries and planting supervision has been provided by appropriately qualified and experienced personnel;

- The Auditor spoke to a Senior Conservation Planning Officer at CPHR who has been in regular communication with Iberdrola (and receiving monthly reports) and they were pleased at the level and openness of communication with the site personnel; and
- The overall impacts on biodiversity observed on site were deemed consistent with Project Approval conditions, and below what was predicted by the environmental assessment (Biodiversity Offset Report) and below the approved EEC and HBT clearing limits.

In summary, the Auditor commends the proponent and site team for their strong commitment to best practice environmental management and focus not only on minimising operational impacts, but building good relationships with stakeholders and enhancing the environmental values of the Project site.

In accordance with Condition E9 of the Project Approval, the proponent must submit a copy of this audit report and their response to the audit findings to the Department in a separate document to this report within three (3) months of the commissioning of this audit, i.e. by 11 May 2026. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

Appendix A

DPHI Audit Team Endorsement

Department of Planning, Housing and Infrastructure

Reference: MP08_0252-PA-69

Mr Joshua Fitzgerald
Site Manager - Operations
FLYERS CREEK WIND FARM PTY LTD
13/01/2026

Sent via the Major Projects Portal only

Subject: Flyers Creek Wind - Request to Approve Auditor

Dear Mr Fitzgerald

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit, submitted to NSW Department of Planning, Housing and Infrastructure (the Department) on 9 January 2026, as required by Schedule E Condition E8 of the Flyers Creek Wind Project, MP08_0252 as modified (Consent) .

The Department has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the audit team from Vantage Environmental Management Pty Ltd are suitably qualified, experienced, and independent.

Therefore, in accordance with Schedule E Condition E8 of the Consent and the Department's *Independent Audit Post Approval Requirements (2020)*, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr Toby Hobbs (Lead Auditor)
- Ms Susannah Price (Assistant Auditor)

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Consent and the Department's *Independent Audit Post Approval Requirements (2020)*. Failure to meet these requirements will require revision and resubmission.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.

Department of Planning, Housing and Infrastructure

- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Notwithstanding the endorsement of the above independent audit team for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to the Department, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Jennifer Rowe, (Senior Compliance Officer) on [REDACTED] or email [REDACTED]

Yours sincerely



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

Appendix B

Consultation

From: [Jennifer Rowe](#)
To: [Toby Hobbs](#); [Katrina O'Reilly](#)
Cc: [Susannah Price](#)
Subject: RE: Flyers Creek Wind Farm MP 08_0252: Proposed Independent Environmental Audit Scope (Audit No. 2)
Date: Tuesday, 27 January 2026 9:24:09 AM
Attachments: [image002.png](#)

To Toby

I have reviewed your email below to NSW Planning, seeking consultation on the upcoming Independent Environmental Audit (IEA) for the Flyers Creek Wind Farm Project (MP 08_0252).

As noted in your email, the Audit needs to ensure that it addresses all conditions of consent for the Project and meet the requirements of the *Independent Audit Post Approval Requirements (DPIE, 2020)*. <https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf>

To Ricardo

NSW Planning has reviewed the proposed scope for the IEA, and would like you to also address/review the following aspects as part of the IEA:

- Review the clearing limits against the actual limits to the predicted limits.
- Review the rehabilitation/planting activities in response to the removal of *Eucalyptus canobolensis*, during initial clearing activities, and whether the project is meeting their commitments regarding the actions that they proposed to undertake and implement.
- Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.
- Review the incident regarding damaged turbine WTG22 and whether the notifications/actions/exclusion zones etc, regarding the management of the incident was adequate and whether there are any recommendations regarding future incidents of this type and/or revisions of management plans.
- Review Bird and Bat Monitoring and ensure recommendations/improvements are being implemented as per the bird and bat adaptive management program to reduce any impacts.
- Review the project is managing and implementing the requirements for:
 - Traffic and Road impacts
 - Noise & Vibration impacts
 - Visual & Lighting Impacts
 - Shadow Flicker

Please consult with the following:

- a. Local Council - Blayney Shire Council and Cabonne Council
- b. Environment Protection Authority
- c. NSW DCCEE/CPHR - (previously known as BCS)
- d. Heritage NSW - Heritage NSW Group within NSW DCCEE
- e. CASA - Civil Aviation Safety Authority

- f. Registered Aboriginal Stakeholders
- g. CCC- community consultative committee

This email is to be appended to the Audit Report.

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

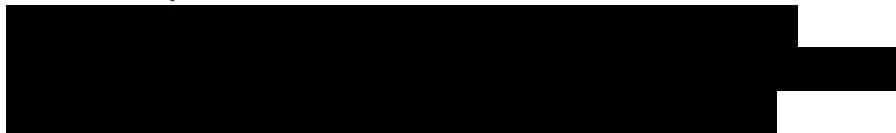
Lastly, it is the expectation that the lead auditor attends audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to *provide the auditor with reasonable access to all requested development areas and activities*, thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).

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

Kind regards,

Jennifer Rowe

Senior Compliance Officer



(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.



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From: Toby Hobbs <thobbs@venv.com.au>

Sent: Wednesday, 14 January 2026 3:39 PM

To: Katrina O'Reilly <[redacted]> DPE PSVC Compliance Mailbox <[redacted]>; Jennifer Rowe <[redacted]>

Cc: Susannah Price <[redacted]>

Subject: Flyers Creek Wind Farm MP 08_0252: Proposed Independent Environmental Audit Scope (Audit No. 2)

Dear Katrina and Jennifer,

Please see attached regarding the proposed scope for the upcoming Flyers Creek Wind Farm Environmental Audit (Audit No. 2).

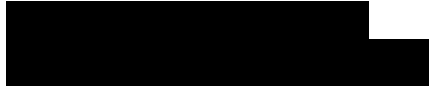
Regards,

Toby

TOBY HOBBS

Lead Auditor

Vantage Environmental Management Pty Ltd



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Susannah Price
Project Manager/Auditor
Vantage Environmental Management Pty Ltd
By email: [REDACTED]

Dear Susannah

Flyers Creek Wind Farm – Independent Environmental Audit

Thank you for your email request dated 27 January 2026 to the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water, inviting input regarding the environmental performance of the Flyers Creek Wind Farm (FCWF) during its operational phase to January 2026.

CPHR continues to engage with FCWF in regards their Bird and Bat Management Plan (BBAMP). CPHR has welcomed Iberdrola's commitment to minimising environmental impacts, particularly their acceptance of CPHR's recommendations in relation to the annual BBAMP reports.

We are, however, concerned about the ongoing strikes of White-striped Freetail Bats at wind farms and the potential for the regional population of this species to suffer a significant long-term decline. FCWF has recorded several impact triggers for White-striped Freetail Bats. Iberdrola committed to curtailment of WTG 20, one of two turbines with a history of impact triggers for this species, with a proposed 4.5 ms⁻¹ curtailment to commence in October 2025.

CPHR considers that the best outcomes for reducing impacts on microbats may be achieved by applying the principles of smart curtailment with turbines only being curtailed when conditions for bat activity are optimal. This would allow full operation of the turbine during periods when interaction with foraging bats is less likely. In August 2025 we offered to meet with Iberdrola to further discuss this matter and maximise benefits for the environment and energy production.

Condition D8 of Project Approval 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 requests that the audit includes an assessment of the annual BBAMP reports and associated correspondence, and whether the appropriate approval conditions are being met.

If you have any questions about this advice, please do not hesitate to contact the Conservation Planning and Assessments - North team at [REDACTED]

Yours sincerely

Naomi Golightly
A/ Senior Team Leader, Conservation Planning and Assessments - North
Conservation Programs, Heritage and Regulation Group

4 February 2026

From: [Sean Greenhill](#)
To: [Susannah Price](#)
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm
Date: Wednesday, 28 January 2026 3:19:20 PM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)

Hi Susannah,

Thanks for your email- some aspects you might wish to consider could include:

- Finalising regular maintenance schedules, now that the premises is operational
- Ensuring timely reporting of incidents to regulators
- Bedding in of earthworks and runoff controls
- Unexpected discharges of SF6 gas from electrical components and switchgear

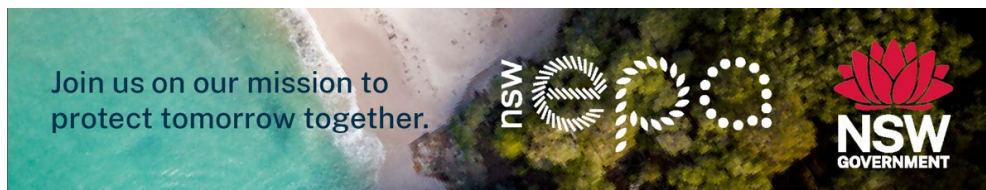
I'm happy to chat about these if it helps you.

Kind regards,
Sean

Sean Greenhill
Operations Officer



Working days: Monday to Friday



The EPA acknowledges the Traditional Custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal Elders past and present.

I work on Wiradjuri Country.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Aron Quinn <aron.quinn@epa.nsw.gov.au>
Sent: Wednesday, 28 January 2026 12:51 PM
To: Susannah Price <[redacted]>
Cc: Sean Greenhill <[redacted]>
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Good afternoon Susannah, thanks for reaching out. I hope you have been well!

I have moved into a different team, the new Officer in charge of Flyer Creek Windfarm is Mr **Sean Greenhill** (I've cc'd him in this email).

Kind regards,

Aron Quinn
Operations Officer



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Report pollution and environmental incidents 131 555 or +61 2 9995 5555



From: Susannah Price <[redacted]>
Sent: Tuesday, 27 January 2026 4:27 PM
To: Aron Quinn <[redacted]>
Cc: INFOEnvironment Mailbox <[redacted]>
Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Hi Aron,

Hope you are going well.

I was in contact with you in 2023 regarding an independent environmental audit for the Flyers Creek Wind Farm. We are now undertaking a second Independent Environmental Audit covering the period from the previous audit, i.e. April 2023 (construction phase) to January 2026 (operation phase).

As per previously, as part of the audit we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during the above-noted period.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments within 2 weeks, i.e. by 11 February 2026.

Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

Vantage Environmental Management Pty Ltd



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From: Aron Quinn <[REDACTED]>
Sent: Wednesday, 10 May 2023 1:36 PM
To: Susannah Price <[REDACTED]>
Subject: RE: Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW) [ref: _00D7F6iTix._5007F1NXQZs:ref]

Good afternoon Susannah, apologies for the response delay.

The EPA has recently been involved with Flyers Creek Wind Farm (EPL 21404), in regard to some potential non-compliances.

In relation to the Independent Environmental Audit, some possible areas for consideration at the Premises would be:

- Adequacy of sediment and erosion controls,
- Consistency with the Environmental Impact Statement (EIS) and related management plans,
- Reporting procedures to Regulatory Authorities such as the EPA and DP&E.

If you have any further questions please feel free to contact me directly.

Kind regards,

Aron Quinn
Operations Officer
Regulatory Operations
NSW Environment Protection Authority
[REDACTED]



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----- Forwarded Message -----

From: Susannah Price [sprice@venv.com.au]

Sent: 21/04/2023 9:32 AM

To: [REDACTED]

Subject: Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW)

Good morning,

I am member of an audit team that has been endorsed by the NSW Department of Planning and Environment to undertake an Independent Environmental Audit of the Flyers Creek Wind Farm, south of Orange, covering the period from the commencement of construction in April 2022 to April 2023.

As part of the audit, we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during construction.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments by 05 May 2023, i.e. in 2 weeks.

Thanks in advance for your time.

Regards

Susannah

SUSANNAH PRICE

Project Manager/Auditor

Vantage Environmental Management Pty Ltd



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From: [Mark Dicker](#)
To: [Susannah Price](#)
Cc: [Andrew Muir](#); [Lauren Ferson](#); [Jacob Hogan](#); [Blayney Shire Council](#)
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm (west of Blayney)
Date: Friday, 20 February 2026 3:17:55 PM

Hi Susannah,

Thank you for your email.

Our feedback is:

- Significantly more vegetation and native trees were removed than necessary for the project.
- The project was very prolonged and poorly planned and managed, resulting in additional, unnecessary and drawn-out impact particularly on residents closest to the towers. An example of this is condition F17.
- Condition F17 required works to be completed within 3 months of completion of construction.
 - Council and the community expectations here was within 3 months of the towers being completed and commissioned.
 - Our understanding is the project commenced operations in April 2025 and was full capacity in May 2025.
 - I note the works associated with condition F17 were completed last week February 2026. Way more than 3 months after completion of construction.
- Surrounding village of Carcoar now has TV reception issues.
- Intersection of Errowanbang Road and Mid Western Highway not being upgraded as required by Roads and Maritime Services (now Transport for NSW) through the Project Approval and as indicated to Council and the community that it would be. This is not good for Iberdrola who want to undertake further projects in this area and blatantly did not complete what was expected from them by public authority (and expected by the community), not good for their social licence to operate.

Thanks Mark

Mark Dicker
General Manager
Blayney Shire Council

From: Susannah Price <sprice@venv.com.au>
Sent: Monday, 16 February 2026 12:19 PM
To: Mark Dicker <[REDACTED]>
Cc: Andrew Muir <[REDACTED]>; Lauren Ferson <[REDACTED]>;
Jacob Hogan <[REDACTED]>; Claire Johnstone
<[REDACTED]>; Blayney Shire Council <[REDACTED]>

Subject: FW: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm (west of Blayney)

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Good afternoon Mark,

Just checking in to see that you received my email from a few weeks ago (see below).

If you would like to provide any feedback as part of the Flyers Creek Wind Farm independent audit, please feel free to contact me this week.

Regards
Susannah

From: Susannah Price
Sent: Tuesday, 27 January 2026 4:20 PM
To: 'Mark Dicker' <[REDACTED]>
Cc: Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm (west of Blayney)

Hi Mark,

Hope you are going well.

I was in contact with you in 2023 regarding an independent environmental audit for the Flyers Creek Wind Farm. We are now undertaking a second Independent Environmental Audit covering the period from the previous audit, i.e. April 2023 (construction phase) to January 2026 (operation phase).

As per previously, as part of the audit we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during the above-noted period.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments within 2 weeks, i.e. by 11 February 2026.

Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE
Project Manager/Auditor

Vantage Environmental Management Pty Ltd

[REDACTED]

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From: Mark Dicker <[REDACTED]>
Sent: Monday, 24 April 2023 7:52 PM
To: Susannah Price <[REDACTED]>
Cc: Andrew Muir <[REDACTED]>; Lauren Ferson <[REDACTED]>;
Jacob Hogan <[REDACTED]>; Claire Johnstone
<[REDACTED]>
Subject: Fwd: Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW)

Hi Susannah,

As someone who has watched this project commence over my 9 years at Blayney Shire Council (8 as Director Planning & Environmental Services), it is good to see the project finally progress and my comments are;

- The project is west of Blayney (not south of Orange). The project has no impact on Orange (nor the Orange Local Government Area),
- After commencing construction in an unprecedented wet period, performance of the applicant has improved significantly in response to road impacts of the area. BSC would feel it has a respectful working relationship with the applicant,
- The applicant adapted and handled the impacts as a result of the Cadia Road closure (16 weeks) as a result of Newcrest Gold Mine necessary works in the area,
- The applicant has been open and communicated reasonably well in relation to works that are required and necessary to be undertaken out of hours,
- The applicant has taken feedback on board regarding improved communications required regarding works in / near road reserves (specifically Cadia Rd) that impact traffic movements and nearby residents,
- It is noted and disappointing that a tree native tree required to be retained was removed and a contractor fined by DPE as a result. BSC has not asked the applicant (but will seek a comment) how it intends to offset this tree removal (even if DPE don't). In this regard I am aware the Department of Planning & Environment were following up on other alleged tree removal (media alerted me to this), I have not heard of an outcome on this.

- Council has found the staff involved in this process to be; open, honest, respectful and response in relation to BSC and community matters. The project is complex and had significant challenges, which have been worked through as the project progresses.

My number is [REDACTED] if you wish to discuss the above further.

Regards

Mark Dicker
General Manager
Blayney Shire Council

Mark Dicker
General Manager
Blayney Shire Council

From: Blayney Shire Council <[REDACTED]>
Sent: Friday, April 21, 2023 10:25 am
To: Andrew Muir <[REDACTED]>; Claire Johnstone <[REDACTED]>; Evatt Bourne <[REDACTED]>; Jacob Hogan <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Mark Dicker <[REDACTED]>
Subject: FW: Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW)

FYI

Jennifer Evans
Administration Officer
Blayney Shire Council

From: Susannah Price <[REDACTED]>
Sent: Friday, 21 April 2023 9:29 AM
To: Blayney Shire Council <[REDACTED]>
Subject: Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW)

Good morning,

I am member of an audit team that has been endorsed by the NSW Department of Planning and Environment to undertake an Independent Environmental Audit of the Flyers Creek Wind Farm, south of Orange, covering the period from the commencement of construction in April 2022 to April 2023.

As part of the audit, we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during construction.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments by 05 May 2023, i.e. in 2 weeks.

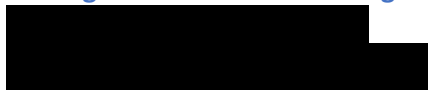
Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

Vantage Environmental Management Pty Ltd



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From: [REDACTED]
To: [Susannah Price](#)
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm
Date: Friday, 20 February 2026 6:43:46 PM

Susannah-happy to provide feedback on behalf of the Flyers Creek Wind Farm Community Consultative Committee(CCC). The CCC membership comprises one landholder who is a host of turbines as part of the windfarm, several neighbouring landholders who do not host turbines, a representative of local environment groups and a representative of Blayney Shire Council. The CCC meets approximately quarterly. After receiving your request for feedback from the CCC to your audit of the environmental performance of the wind farm project during the construction and early operational phases, I sent out a request to CCC members for any relevant feedback. The following is a summary of feedback received:

- There was significant concern about damage to, removal of, native vegetation along some of the access roads during the construction phase and at the on-property sites of turbine installation/construction
- This damage to/removal of native vegetation included the apparent loss of, or damage to, some aboriginal heritage sites
- This damage to/removal of native vegetation included loss of important hollows that are important habitat for some significant threatened bird species
- There was concern about poor management of muddy/potentially contaminated water runoff from some turbine construction/installation sites.

I would be happy to provide clarification or additional information on any of these points, if required.

Ian Rogan
Chair, CCC
[REDACTED]

From: Susannah Price <[REDACTED]>
Sent: Monday, 16 February 2026 5:48 PM
To: [REDACTED]
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

No problem Ian,

I'd appreciate that.

Regards
Susannah

From: [REDACTED] <[REDACTED]>
Sent: Monday, 16 February 2026 5:07 PM
To: Susannah Price <[REDACTED]>
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Sorry I have been slow to respond Susannah-I have not been able to receive or respond to emails

for the past couple of weeks. I will quickly consult with CCC members and see if there is any information/feedback I can compile for you. Ian

From: Susannah Price <[REDACTED]>
Sent: Monday, 16 February 2026 12:17 PM
To: [REDACTED]
Subject: FW: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Good afternoon Ian,

Just checking in to see that you received my email from a few weeks ago (see below).

If you would like to provide any feedback as part of the Flyers Creek Wind Farm independent audit, please feel free to contact me this week.

Regards
Susannah

From: Susannah Price
Sent: Wednesday, 28 January 2026 8:51 AM
To: [REDACTED] <[REDACTED]>
Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Good morning Ian,

Josh Fitzgerald, Flyers Creek Wind Farm (FCWF) Site Manager, has given me your email as a contact for the Community Consultative Committee (CCC) for the FCWF.

I am part of an audit team undertaking an Independent Environmental Audit (IEA) of the FCWF project covering the period from April 2023 (construction phase) to January 2026 (operation phase). This is the second IEA of the FCWF project.

As part of the audit, we are seeking input from several stakeholders, including the CCC, as to whether they have any comment regarding the environmental performance of the project during the above-noted period.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments within 2 weeks, i.e. by 12 February 2026.

Thanks in advance for your time.

Regards
Susannah

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Project Manager/Auditor

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From: [Alison Lamond](#)
To: [Susannah Price](#)
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm
Date: Monday, 9 February 2026 1:45:44 PM
Attachments: [image001.png](#)

Hello Susannah,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

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

Kind regards,

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

[REDACTED]

dcceew.nsw.gov.au

[REDACTED]

Locked Bag 1002, Dangar NSW 2309

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



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

Please consider the environment before printing this email.

From: Susannah Price <[REDACTED]>
Sent: Tuesday, 27 January 2026 4:36 PM
To: Nicole Davis <[REDACTED]>
Cc: OEH HD Heritage Mailbox <[REDACTED]>
Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Hi Nicole,

Hope you are going well.

I was in contact with you in 2023 regarding an independent environmental audit for the Flyers Creek Wind Farm. We are now undertaking a second Independent Environmental Audit covering the period from the previous audit, i.e. April 2023 (construction phase) to January 2026 (operation phase).

As per previously, as part of the audit we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during the above-noted period.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments within 2 weeks, i.e. by 11 February 2026.

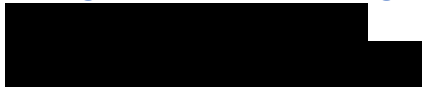
Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

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Regards
Susannah

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From: Nicole Davis

Sent: Wednesday, 10 May 2023 7:06 PM

To: Susannah Price

Subject: Heritage NSW Reply - Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW)

Hi Susannah,

This request took a long time to fine me. Always address any correspondence for Heritage NSW to our generic mailbox HERITAGEMailbox@environment.nsw.gov.au

Environment line is for reporting potential or known harm to the environment and/or heritage. DPE should have provided you with the relevant contact details, or you should have at least looked at our website. Irrespective, Heritage NSW has no additional comments with respect to your proposed audit.

Kind Regards

Nicole Davis

Nicole Davis

Manager Assessments

Heritage NSW

Department of Planning and Environment

[Redacted]



From: Environment Line <[Redacted]>

Sent: Friday, 21 April 2023 10:45 AM

To: OEHD Heritage Mailbox <[Redacted]>

Subject: FW: Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW) [ref:_00D7F6iTix._5007F1NXQa7:ref]

Dear Heritage

Please find the attached enquiry.

Kind Regards
Matt

Environment Line
Corporate Services | Department of Planning and Environment
T.131 555 | Email: info@environment.nsw.gov.au

4 Parramatta Square, 12 Darcy St, Parramatta NSW 2150
<https://www.epa.nsw.gov.au/about-us/contact-us/environmentline>
www.dpie.nsw.gov.au

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.

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----- Forwarded Message -----

From: Susannah Price [sprice@venv.com.au]

Sent: 21/04/2023 9:34 AM

To: info@environment.nsw.gov.au

Subject: Independent Environmental Audit - Flyers Creek Wind Farm (south of Orange, NSW)

ATTENTION: Heritage NSW

Good morning,

I am member of an audit team that has been endorsed by the NSW Department of Planning and Environment to undertake an Independent Environmental Audit of the Flyers Creek Wind Farm, south of Orange, covering the period from the commencement of construction in April 2022 to April 2023.

As part of the audit, we are seeking input from Heritage NSW as to whether you have any comment regarding the environmental performance of the project during construction.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments by 05 May 2023, i.e. in 2 weeks.

Thanks in advance for your time.

Regards

Susannah

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ref:_00D7F6iTix._5007F1NXQa7:ref

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From: [Rhassel Mhasho](#)
To: [Susannah Price](#); [Cabonne Council](#)
Subject: RE: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm
Date: Friday, 6 February 2026 2:22:06 PM

Hello Susannah

Please be advised that Council does not have any records of non-compliance or complaints of the Flyers Creek Wind Farm for the period April 2023 (construction phase) to January 2026 (operation phase).

Regards

Rhassel Mhasho
Department Leader - Development
Services



Cabonne Council
PO Box 17


Molong NSW 2866
(02) 6392 3200
Council@cabonne.nsw.gov.au
www.cabonne.nsw.gov.au

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From: Susannah Price <sprice@venv.com.au>
Sent: Tuesday, 27 January 2026 4:25 PM
To: Cabonne Council < >
Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

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Hi,

I am member of an audit team that has been endorsed by the NSW Department of Planning, Housing and Infrastructure to undertake a second Independent Environmental Audit of the Flyers Creek Wind Farm, covering the period from the previous audit, i.e. April 2023 (construction phase) to January 2026 (operation phase).

As part of the audit, we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during the above-noted period.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments within 2 weeks, i.e. by 11 February 2026.

Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

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From: [AVG Correspondence](#)
To: [Susannah Price](#)
Subject: CASA Response - SUSANNAH PRICE Vantage Environmental Management Pty Ltd - Independent Environmental Audit No. 2 - Flyers Creek Wind Farm - January 2026 [SEC=OFFICIAL]
Date: Friday, 30 January 2026 10:50:42 AM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

OFFICIAL

CASA Ref - F18/1743-2

Dear Susannah

Thank you for the opportunity to comment and provide input to your audit.

CASA has no comments regarding the environmental performance of the Flyers Creek Wind Farm project.

Kind regards,

Kathy Robertson

Communications and Reporting Officer
Stakeholder Engagement Division
[Contact us | Civil Aviation Safety Authority](#)
Civil Aviation Safety Authority

casa.gov.au



We acknowledge the traditional owners of the country throughout Australia and their continuing connection to land, sea and community. We pay our respect to them and their cultures and to the Elders past and present.

From: Susannah Price <[REDACTED]>
Sent: Tuesday, 27 January 2026 4:38 PM
To: Applications <[REDACTED]>
Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

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Hi,

I am member of an audit team that has been endorsed by the NSW Department of Planning, Housing and Infrastructure to undertake a second Independent Environmental Audit of the Flyers Creek Wind Farm, covering the period from the previous audit, i.e. April 2023 (construction phase) to January 2026 (operation phase).

As part of the audit, we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during the above-noted period.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments within 2 weeks, i.e. by 11 February 2026.

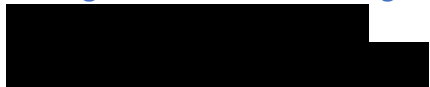
Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

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From: [Ben Kemp](#)
To: [Susannah Price](#)
Cc: [Annette Steele](#)
Subject: Re: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm
Date: Monday, 16 February 2026 1:05:46 PM

Hi Susannah,

Thank you for reaching out, I haven't been told of any issues from my team but ill pass this on to them any see if they have anything to add.

Ben Kemp
Assets & Projects Manager



120 Byng St.
Orange NSW 2800

I acknowledge and pay my respects to Elders both past and present and the Wiradjuri people who are the traditional custodians of this land.

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From: Susannah Price <[REDACTED]>
Sent: Monday, February 16, 2026 12:24 PM
To: Ben Kemp <[REDACTED]>
Cc: Annette Steele <[REDACTED]>
Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Some people who received this message don't often get email from sprice@venv.com.au. [Learn why this is important](#)

Good afternoon Ben,

I sent an email to OLALC's reception email a few weeks ago (see below) and just checking if it might have been passed along to you? I got your name from Josh Fitzgerald at the Wind Farm who said they have been working with you on site.

If you would like to provide any comment as part of the audit, please feel free to contact me this week.

Thanks

Susannah
[REDACTED]

From: Susannah Price

Sent: Tuesday, 27 January 2026 4:40 PM

To: [REDACTED]

Subject: Independent Environmental Audit No. 2 - Flyers Creek Wind Farm

Hi,

I am member of an audit team that has been endorsed by the NSW Department of Planning, Housing and Infrastructure to undertake a second Independent Environmental Audit of the Flyers Creek Wind Farm, covering the period from the previous audit, i.e. April 2023 (construction phase) to January 2026 (operation phase).

As part of the audit, we are seeking input from your organisation as to whether you have any comment regarding the environmental performance of the project during the above-noted period.

As we have a limited time frame to conduct the audit, it would be most appreciated if you could supply any comments within 2 weeks, i.e. by 11 February 2026.

Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

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Appendix C

Independent Audit Table

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

[Original Project Approval text in black, Modifications 1-4 text in blue, Modification 5 text in red]

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE C - ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
C1	In addition to meeting the specific environmental performance criteria established under this approval, the Proponent must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, or decommissioning of the Project.	All evidence collected and observations made during this audit (for the operation and part of the construction phases of development). Evidence was not collected regarding the decommissioning phase of the development as this phase has not yet occurred.	The environmental management and mitigation measures in place for the operation phase (and part of the construction phase) of the Project were deemed to be generally suitable and consistent with Consent conditions.	Compliant
TERMS OF APPROVAL				
C2	The Proponent shall carry out the Project: (a) generally in accordance with the EA; and (b) in accordance with the conditions of this approval. <i>Note: The general layout of the project is depicted in Figure 1-1 in Appendix 1.</i>	The findings of this audit	The development is being carried out generally in accordance with the EA and the conditions of this Project Approval.	Compliant
C3	In the event of an inconsistency between the documents referred to in condition C2, 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.	N/A	There have been no reported inconsistencies between the plans and documentation referred to in this condition.	Not triggered
C4	The Proponent shall comply with any reasonable requirement/s of the Planning 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. 	- All evidence collected and observations made during this audit	The proponent has complied with requests and requirements from the Secretary.	Compliant
LIMITS OF APPROVAL				
C5	This project approval shall lapse five years after the date on which it was granted, unless works the subject of this approval have physically commenced before this time.	- Project Approval (unmodified) dated 14/03/14 - Pre-construction Compliance Report (PCCR), Flyers Creek Wind Farm (Rev. 1, 23/02/22), prepared by Arcadis	Pre-construction works (i.e. survey pegging, geotechnical surveys, construction of access tracks and temporary laydown areas) were completed prior to 13/03/19, i.e. within five years of the Project Approval (as unmodified) date.	Compliant
C6	The Proponent may install up to 38 wind turbines. <i>Note: To identify the approved wind turbine locations, see Figure 1-1 and corresponding GPS coordinates in Appendix 1.</i>	- FCWF Turbine Locations.kmz file viewed on Google Earth showing 38 turbines - Final Layout Plans (Condition C7 and C9), Flyers Creek Wind Farm, 21/01/22 prepared by Iberdrola	Google Earth turbine location satellite image (viewed 10/03/26), Final Layout Plans and project personnel confirmed that 38 wind turbines have been installed.	Compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

[Original Project Approval text in black, Modifications 1-4 text in blue, Modification 5 text in red]

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C7	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) turbines 1 and 9 are not moved closer to the residences “Hillvue” and “Cooramilla” from the relevant GPS coordinates in Appendix 1 respectively; (iii) the revised location of the wind turbine is at least 50 metres from existing hollow-bearing trees; or where the approved turbine location is already within 50 metres of existing hollow-bearing trees, the revised location of the turbine is not moved any closer to existing hollow-bearing trees; and (iv) the revised location of the wind turbine and/or ancillary infrastructure would not result in any non-compliance with the conditions of this approval.	- Final Layout Plans (Condition C7 and C9), Flyers Creek Wind Farm, 21/01/22 prepared by Iberdrola - Verification of GPS coords of Wind Turbine Generators 1 and 9 during IEA No. 1 site visit	Detailed Final Layout Plans were submitted to DPE prior to the commencement of construction. Plans included details of the micro-siting of the wind turbines and ancillary infrastructure and the GPS coordinates of the final wind turbine locations. The GPS coords of turbines 1 and 9 were verified to be in accordance with permitted design locations at time of IEA No. 1 site visit	Compliant
C8	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 Planning 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 Planning 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.	- Site Generation records from Mondo RE_ Request _ Flyers Creek Wind Farm - Reports with independently-verified annual electricity generation records for 2023-2026 (part), including raw data: - IS414400-WTG-MEM-0001-B FCWF Annual Generation Records 2023 - IS414400-WTG-MEM-0002-B FCWF Annual Generation Records 2024 - IS414400-WTG-MEM-0003-B FCWF Annual Generation Records 2025 - IS414400-WTG-MEM-0004-B FCWF Annual Generation Records 2026 (01/01/26 to 17/02/26)	The Proponent confirmed that no turbines had not been used for generation of electricity for a continuous period of 12 months, and therefore no decommissioning was required (unless otherwise agreed by the Planning Secretary). Jacobs has prepared independently-verified annual records for 2023 to 2026. Each of these reports conclude that none of the 38 FCWF WTGs have experienced a continuous 12-month period without generating electricity. As of 17/02/26, the longest period of no generation was 237 days for turbine T22. Turbine T22 has not operated since 10/09/25 due to a damaged turbine blade. Three (3) new blades have been ordered and the proponent has estimated the turbine will commence operation in early 2026.	Compliant
FINAL LAYOUT PLANS				
C9	Prior to the commencement of construction, the Proponent must submit detailed plans of the final layout of the Project to the Planning 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>	- Final Layout Plans (Condition C7 and C9), Flyers Creek Wind Farm, 21/01/22 prepared by Iberdrola - Correspondence dated 18/02/22 from DPE acknowledging submission of Final Layout Plans	Detailed Final Layout Plans were submitted to DPE prior to the commencement of construction. Plans included details of the micro-siting of the wind turbines and ancillary infrastructure and the GPS coordinates of the final wind turbine locations.	Compliant
NOTIFICATION TO DEPARTMENT				
C10	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.	- Correspondence to DPE dated 28/03/22 from proponent providing date of commencement of construction as 04/04/22 - Correspondence to DPHI dated 04/07/25 from proponent providing date of commencement of operation as 11/07/25	DPE were notified of the date of commencement of construction prior to commencement of construction. DPHI were notified of the date of commencement of operation prior to commencement of operation. The proponent reported that construction is not being staged and therefore there was no need to notify the Department or inform the local community or CCC regarding staging of plans.	Compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

[Original Project Approval text in black, Modifications 1-4 text in blue, Modification 5 text in red]

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		- Superseded correspondence to DPHI dated 07/01/25 from proponent providing date of commencement of operation		
STRUCTURAL ADEQUACY				
C11	<p>The Proponent must ensure that:</p> <p>(a) the wind turbines are constructed in accordance with the relevant standards, including the structural design requirements of <i>IEC 61400-1 Wind turbines – Part 1: Design Requirements</i> (or equivalent); and</p> <p>(b) all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p>Notes:</p> <ul style="list-style-type: none"> • Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	<p>- Safe Access and Access Provisions Compliance and Performance Based Review issued by LeBLANC (dated 16/06/22) including a “Design Evaluation Conformity Statement” by TuvNord</p> <p>- Construction Certificates No. 899.1-2021 to 899.20-2021 issued by Pro Cert Group</p> <p>- DPE email regarding acceptance of Application for Construction Certificate (CFT-173877) dated 10/08/22</p> <p>- Interim Occupation Certificate No. 899-19/2021 for WTG 01 – 08 by Pro Cert Group (dated 18/04/24).</p> <p>- Interim Occupation Certificate No. 899-20/2021 for Substation and O&M Facility including Warehouse, Workshop, O&M Building, Control room, Switch room, Substation and the Switching Station Facility at Point of Connection by Pro Cert Group (dated 18/04/24).</p> <p>- Pro Cert Group Critical Stage Inspection letters for WTG 01-WTG 38 foundations</p> <p>- Inspection Certifications for WTG Reinforced Concrete Foundations for WTF 01- WTG 38</p> <p>- LeBlanc WTG Compliance Inspection reports for WTG 01 – WTG 38</p> <p>- Occupation Certificate Tracker dated 25/03/26</p>	<p>A performance-based review, completed by LeBLANC, concluded that the design considerations of the wind turbines exceeded or met the Australian standards. The Tuv Nord Design Evaluation Conformity Statement references the IEC 61400-1 (Design requirements) and IEC 61400-22 (Conformity testing and certification).</p> <p>Critical Stage Inspection letters and Inspection Certificates for the WTG foundations were sighted by the Auditor.</p> <p>The proponent has obtained Interim Occupation Certificates for the substation and O&M facility and 8 of the 38 Wind Turbine Generators. Evidence was provided to the Auditor that the proponent is working to obtain all Occupation Certificates as a priority and have produced an Occupation Certificate tracker and set up meetings with the certifier.</p> <p>Non-compliance No. 1 (FCWF-IEA2-NC1): Occupation Certificates have not been finalised for the substation and O&M facility and the 39 wind turbine generators.</p> <p>Recommendation No. 1 (FCWF-IEA2-R1): Finalise obtaining Occupation Certificates for the substation and O&M facility and the 39 wind turbine generators as a priority.</p>	Non-compliant
DEMOLITION				
C12	The Proponent must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: <i>The Demolition of Structures</i> , or its latest version.	N/A	The proponent is not undertaking any demolition work as part of this development.	Not triggered

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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
PROTECTION OF PUBLIC INFRASTRUCTURE				
C13	<p>Unless the Proponent and the applicable authority agree otherwise, the Proponent must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Project; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Project.</p> <p>This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this approval.</p>	<p>- Iberdrola Internal memo containing invoices issued to Iberdrola by GLC (contractor) related to relocating public infrastructure (and photos) including:</p> <ul style="list-style-type: none"> • Enercon 4 x 11kV underground crossings (14/09/23) • Additional Telstra works (18/04/24) • SS Telstra line re-allocation (09/08/23) • Telstra Relocation and HV Crossing 11kV (17/07/23) 	Iberdrola has paid full costs for relocating public infrastructure.	Compliant
OPERATION OF PLANT AND EQUIPMENT				
C14	<p>The Proponent must ensure that all plant and equipment used on site, or in connection with the Project, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>- Preventive maintenance checklists viewed for the following dates: 13/10/25, 14/01/26, 18/02/26. All relevant information presented.</p> <p>- Detailed maintenance records held for key site plant, equipment and infrastructure including lighting, transmission lines (thermography testing), vegetation and bushfire clearance, residual current devices, workshop equipment, fire-fighting equipment, substation, turbines, etc.</p>	Completed register/inspections/maintenance records held on site. Relevant information presented within the registers. Information was current to date of audit site visit.	Compliant
UPDATING & STAGING OF STRATEGIES, PLANS OR PROGRAMS				
C15	<p>With the approval of the Planning Secretary, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised strategies, plans or programs to the Planning Secretary for approval.</p> <p>With the agreement of the Planning Secretary, the Proponent may prepare any revised strategy, 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"> • While any strategy, 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 strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future critical stages, and the trigger for updating the strategy, plan or program. 	N/A	The proponent reported that the construction of the development was not staged and therefore strategies, plans and programs have not been submitted on a progressive basis.	Not triggered
PLANNING AGREEMENT				
C16	<p>From the date of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must implement the VPA executed with Blayney Shire Council on 22 October 2015.</p>	<p>- Iberdrola VPA contribution payment spreadsheet including most recent payment of 21/01/26 for period covering 01/01/26 to 30/06/26</p>	Evidence of payments associated with the VPA from Iberdrola to Blayney Shire Council were provided.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> - Email correspondence from Blayney Shire Council including Tax Invoice seeking payment for most recent VPA contribution dated 23/01/26. - Excerpts from Iberdrola Accounting Software showing purchase orders and payment of invoices 		
SCHEDULE D – ENVIRONMENTAL PERFORMANCE				
BIODIVERSITY				
Restrictions on Clearing and Habitat Impacts				
D1	<p>The Proponent must:</p> <p>(a) ensure that no more than 4.03 28.1 ha of EEC is cleared for the project, unless the Planning Secretary agrees otherwise; and</p> <p>(b) minimise the clearing of native woodland vegetation, scattered paddock trees and fauna habitat (including rocky outcrops) within the approved disturbance footprint.</p>	<ul style="list-style-type: none"> - Planning secretary agreement letter of 13/08/21 with the following revisions: <ul style="list-style-type: none"> • No more than 28.1 ha of critical EEC may be cleared for the project (increased from 4.03 ha) - Contractor’s Monthly Progress Report, dated May 2024, prepared by elecnor australia - Email correspondence from the proponent dated 31/03/26 - Permanent boundary fencing observed to be in place. Locations of this fencing was via survey of permissible boundaries. 	<p>The Auditor sighted the contractor’s monthly progress report which reported the final project impact was 17.93 ha of EEC, which is less than the requirements of this condition.</p> <p>The proponent reported that Jacobs had undertaken an independent mapping validation exercise on Iberdrola’s behalf to verify this number and confirmed that the EEC removed did not exceed 17.93 ha.</p>	Compliant
D2	<p>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 included in the Construction Flora and Fauna Management Plan required by condition F21(f).</p>	<ul style="list-style-type: none"> - Audit site visit observations, timber has been utilised to enhance habitat - Iberdrola environmental checklists and inspection records: e.g. 06/12/24 and 12/09/25 confirming stockpile relocation at wind turbine collector group 1 <div data-bbox="1507 1524 1855 1955" style="text-align: center;"> </div>	<p>Stockpiles of felled timber have been relocated and reused onsite as coarse woody-debris habitat enhancement</p> <p>Hollows (where possible) were salvaged for future use for Flyers Creek Wind Farm rehabilitation areas including habitat enhancement and nest-box construction.</p>	Compliant

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D3	No more than 26 189 hollow bearing trees shall be removed for the project, unless the Planning Secretary agrees otherwise.	- Planning secretary agreement letter of 13/08/21 with the following revisions: <ul style="list-style-type: none"> No more than 189 hollow bearing trees may be removed for the project (increased from 26) - Contractor’s Monthly Progress Report, dated May 2024, prepared by elecnor australia - Email correspondence from the proponent dated 31/03/26	The Auditor sighted the contractor’s monthly progress report which reported the final project impact was 146 hollow bearing trees (HBT), which is less than the requirements of this condition. The proponent reported that Jacobs had undertaken an independent mapping validation exercise on Iberdrola’s behalf to verify this number and confirmed that the HBTs removed did not exceed 146.	Compliant
Bird and Bat Monitoring and Management				
D4	Prior to the commencement of operations , the Proponent shall, in consultation with the BCS , prepare and submit for the approval of the Planning Secretary a Bird and Bat Adaptive Management Program , which takes into account bird / bat monitoring methods identified in the current editions of AusWEA <i>Best Practice Guidelines for the Implementation of Wind Energy Projects in Australia</i> and <i>Wind Farm and Birds: Interim Standards for Risk Assessment</i> . The Program shall be prepared and implemented by a suitably qualified expert, approved by the Planning 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: <ul style="list-style-type: none"> (a) incorporate an ongoing role for the suitably qualified expert; (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; (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; (d) identify ‘at risk’ bird and bat groups (inclusive of the Superb Parrot), 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; (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 (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. The Reports referred to under part (f) shall be submitted to the Planning Secretary and BCS on an annual basis for the first five years of operation and every two years thereafter (unless otherwise agreed to by the Planning Secretary), and shall be prepared within two months of the end of the reporting period. The Planning Secretary may, at the request of	- Bird and Bat Adaptive Management Program (BBAMP), Flyers Creek Wind Farm (FCWF), January 2020 (Report No. 18090 [4.6]), prepared by Nature Advisory. - DPE approval letter of BBAMP dated 14/02/20 - BBAMP, FCWF, July 2024 (Report No. 18091 (4.7), updated by Nature Advisory - Lodgement of BBAMP Rev. 4.7 to Major Projects Portal on 11/07/25 - CPHR letter dated 14/11/25 endorsing Rev. 4.7 of the BBAMP noting revisions are minor and administrative in nature. - Follow-up with DPHI dated 24/02/26 to obtain approval of BBAMP Rev 4.7 - FCWF Operational Stage Bird and Bat Monitoring, Annual Report 2024/2025, FINAL dated 28/05/25, prepared by Habitat Innovation & Management (HI&M) - CPHR response letter dated 04/06/25 regarding Annual Report 2024/2025 - Iberdrola response letter to CPHR dated 27/08/25 addressing their comments and recommendations - DPHI response letter dated 24/06/25 regarding Annual Report 2024/2025 - Iberdrola letter dated 11/08/25 to GE Renewable Energy Australia re: formal notification of a proposed trial curtailment	The BBAMP (Rev. 4.6) was submitted and approved by DPHI prior to commencement of operation. The proponent lodged Rev 4.7 of the BBAMP to DPHI on 11/07/25, which fulfilled the requirement of the Operations Environmental Management Plan conditional approval. CPHR have endorsed Rev 4.7 of the BBAMP (on 14/11/25) and, as of 12/03/26, the proponent was still waiting for a response from DPHI regarding the approval of Rev 4.7 of the BBAMP. The first annual report for 2024/2025 (covering May 2024 – April 2025) was finalised on 28/05/25 which is within 2 months of the end of the reporting period. The annual report was submitted to DPHI and CPHR (formerly BCS). CPHR responded to the annual report on 04/06/25 with the following comments/recommendations: <ul style="list-style-type: none"> The company undertaking the monitoring and reporting (Habitat Innovation and Management [HI&M]) was commended for the level of analysis in the annual report Questioned how the 19 WTG (of 38) were selected for monthly carcass searches Recommended adding at least 2 WTG’s from the more heavily timbered central section of the wind farm Recommended implementing a trial of a 4.5m/s dusk to dawn curtailment during October and March for 2 turbines at higher risk of microbat blade strike Recommended conducting periodic checks of the wedge-tailed eagle nest to determine the fledging date of chicks and monitor the juveniles to determine their fate. 	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>the Proponent at anytime, vary the reporting requirement or period by notice in writing to the Proponent.</p> <p>The Proponent is required to implement feasible and reasonable mitigation measures as identified under part (e) where the need for further action is identified through the Bird and Bat Adaptive Management Program, or as otherwise agreed with the Planning Secretary.</p>	<ul style="list-style-type: none"> - T20 and T21 Turbine Status for 01-31/01/26 - T20-T21 Operational Data for 01-31/01/26 - FCWF Operational Stage Bird and Bat Monthly Monitoring Report, December 2025 	<p>Iberdrola responded to the CPHR letter on 27/08/25 with the following responses/actions:</p> <ul style="list-style-type: none"> • Explained how the 19 turbines were selected • HI&M ecologists began monthly monitoring of 2 additional WTG's during July 2025 (selected from those recommended by CPHR) • Following consideration and in consultation with HI&M, Iberdrola proposed curtailment at 1 of 2 of the identified turbines (WTG 20 and 38). From October 2025, a trial of 4.5m/s curtailment would be implemented with results of this trial interrogated in monthly reports • Monitoring of the wedge-tailed eagle nest commenced on 16/07/25 with periodic monitoring to continue • A monitoring plan would be developed re: nest site activity and fledging details and fate of fledged birds • Iberdrola have completed additional environmental initiatives outside of the BBAMP and Project Approval conditions including: <ul style="list-style-type: none"> ○ Additional monitoring between December 2023 and April 2024 during commissioning ○ Ongoing collaboration with UNSW which will include a field study on bird and flying foxes which will be used to inform the siting, construction and operation of wind energy facilities with minimal biodiversity impacts ○ Worked with HI&M to improve and connect habitat for the threatened squirrel glider at the site, including installation of 25 squirrel glider boxes, design and installation of glider pole and a rope, and planting of 1,200 tubestock. <p>- DPHI responded to the annual report on 24/06/25 noting they would record the 4 incident triggers and that mitigation measures were being implemented to address the matters.</p> <p>- T20 Turbine Status sighted by auditor for 01-31/01/26 showing reduced "Produced Energy" (compared to T21) due to curtailment trial during dusk and dawn</p> <p>- A Bird and Bat Monthly Monitoring Report for December 2025 (the 20th monthly report produced) was provided to CPHR and included the following information relevant to the correspondence discussed above:</p> <ul style="list-style-type: none"> • Total of 21 WTG's surveyed (including 2 additional WTG's as recommended by CPHR) • Monitoring of wedge-tailed eagle chicks and information about fledging date; 	

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			<ul style="list-style-type: none"> An unexpected blade breakage at WTG 22 has restricted access for safety reasons to WTG 20 to inspect for white-striped freetail bats and halted the trial of curtailing WTG 20 between dusk and dawn. The trial may be repeated between October 2026 and March 2027. <p>- The Auditor spoke to a Senior Conservation Planning Officer at CPHR who has been in regular communication with Iberdrola (and receiving monthly reports) and is pleased at the level and openness of communication with the proponent.</p>	
Biodiversity Offset Package				
D5	<p>Prior to the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must:</p> <p>(a) update the baseline mapping of the vegetation and key habitat within the final disturbance area; and</p> <p>(b) calculate the biodiversity offset credit liabilities for the project in accordance with the <i>Biodiversity Assessment Methodology</i> under the <i>NSW Biodiversity Offsets Scheme</i>, in consultation with BCS, and to the satisfaction of the Planning Secretary.</p>	<p>- Biodiversity Offset Report (BOR), Flyers Creek Wind Farm (October 2021), prepared by NGH Consulting.</p> <p>- DPE approval letter of BOR (inc. Mapping and Credits) dated 10/11/2021</p> <p>- Planning secretary agreement letter of 13/08/21 with the following revisions:</p> <ul style="list-style-type: none"> No more than 28.1 ha of critical EEC may be cleared for the project; and No more than 189 hollow bearing trees may be removed for the project 	<p>The Biodiversity Offset Report (BOR) was prepared by NGH Environmental, and the most recent version viewed as part of this audit was Revision "Final V1.2" dated 19 October 2021. The BOR was approved by DPIE on 10 November 2021, prior to commencement of construction.</p> <p>The BOR was developed in consultation with the Biodiversity Conservation and Science (BCS) division and contains updated vegetation and key habitat mapping and has calculated the biodiversity credit liabilities in accordance with the Biodiversity Assessment Method (BAM).</p>	Compliant
D6	<p>Within 2 years of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must retire the required biodiversity credits, to the satisfaction of BCS.</p> <p>The retirement of the credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Scheme</i>, and can be achieved by:</p> <p>(a) acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>;</p> <p>(b) making payments to the Biodiversity Conservation Fund; or</p> <p>(c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.</p>	<p>- Biodiversity Conservation Trust Section 6.22 Statement showing retirement of biodiversity credits on 08/11/23</p> <p>- Biodiversity Credit Transfer Reports showing retirement of biodiversity credits dated 05/03/24, 06/03/24 and 08/03/24</p> <p>- Letter to DPE dated 04/04/24 providing evidence of retirement of biodiversity credits</p> <p>- Flyers Creek PCT Summary spreadsheet</p> <p>- BOAM Credit Transaction Sale Export spreadsheet</p> <p>- Iberdrola email correspondence with ngh consulting and niche Environment and Heritage regarding biodiversity credits in August and September 2023</p>	<p>All biodiversity credits were retired within 2 years of the commencement of construction, i.e. prior to 04/04/24.</p> <p>The credits were retired by a mix of direct payment into the Biodiversity Conservation Trust and to individual vendors with existing biodiversity stewardship sites.</p>	Compliant
WATER QUALITY AND HYDROLOGY				

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D7	Except as may be provided by an EPL, the Project shall be constructed and operated to comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> , which prohibits the pollution of waters.	- Incident Register and EPA notifications in accordance with the Project Environment Protection Licence	No penalty notices, or similar, had been issued by EPA with respect with potential water quality and hydrology issues within the current audit period.	Compliant
D8	Waterway crossings shall be designed and constructed in consultation with DoI – L&W and DPI (Fisheries) and consistent with DPI (Fisheries) guidelines, <i>Policy and Guidelines for Fish Friendly Waterway Crossings</i> (2004) and <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (2004) and Guidelines for Controlled Activity on Waterfront Land (NSW Office of Water, 2012), or their latest version.	- Drainage Design Report (Rev. C, 30/05/22), prepared by icubed - Construction Soil and Water Quality Management Plan (CSWQMP), Flyers Creek Wind Farm Project (Rev. E, 25/06/20), prepared by Nacap - DPE approval letter of CSWQMP (Rev. E, 25/06/20) dated 03/07/20 - FCWF Operations & Maintenance (O&M) Manual, prepared by Elecnor, Rev 00 dated 31/08/24: Section 2.2 - Earthworks, Roads & Drainage Specification, prepared by green light elecnor, Rev 0 dated 25/07/22	Section 2 of the Drainage Design Report provides information that the drainage design criteria and method has been developed in accordance with Watercourse crossings in accordance with the Controlled Activity Guidelines (NSW Office of Water, 2012). The proponent confirmed that there were no relevant water crossings and, as such, no consultation with DoI – L&W has been conducted to date. The O&M Manual discusses drainage, including inspections and maintenance activities.	Compliant
NOISE				
D9	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 sensitive receivers.	- 132kV Transmission Line: Basis of Design Specification report prepared by Arcadis (dated 27/07/22)	Project designs are reported to be consistent with minimising corona and aeolian noise.	Compliant
HAZARDS AND RISK				
D10	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.	- Construction Compound and Ancillary Facilities Management Plan (CCAFMP), Flyers Creek Wind Farm (Rev. F, 29/10/21), prepared by Nacap - Iberdrola FCWF Work, Health and Safety Management Plan (Section 3.8) - SDS Chemical Register - Site Plans showing Dangerous Goods storage locations - Audit site visit observations, including hard copies of SDS, electronic registers, manifests - Bunded and flame-proof storage enclosures present. SDS cabinet at O&M front gate.	For construction works, dangerous goods storage was discussed in Section 5.3 of the CCAFMP and Section 27.5 of the contractor’s Health and Safety Management Plan. Hard copies of the SDS are stored on site and were viewed at the time of the audit in the hazardous chemical storage area, at front gate and within O&M office. All dangerous goods were appropriately stored on site at time of audit. Manifests were well maintained and chemicals were consolidated by class type.	Compliant



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Aviation Obstacles and Hazards				
D11	<p>Prior to the commencement of construction, the Proponent shall consult with:</p> <p>(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;</p> <p>(b) AirServices Australia, to determine potential impacts on instrument approach procedures at aerodromes, navigational aids, communications and surveillance facilities, inclusive of the redesign of the Non-Directional Beacon Approach (if required);</p> <p>(c) Aerial Agriculture Association Australia, to determine potential hazards to aerial application and related operations; and</p> <p>(d) Rural Fire Service, to determine potential hazards to the aerial fighting of fires.</p> <p>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.</p>	<ul style="list-style-type: none"> - Letter to DPIE dated 06/09/21 including details of consultation undertaken with aviation stakeholders - DPIE acknowledgement receipt dated 15/09/21 with no comment provided 	<p>The proponent consulted with Orange Airport (Orange City Council), AirServices Australia, Aerial Agriculture Association Australia, RFS Canobolas, CASA and AirServices Australia in accordance with the requirements of this condition.</p>	Compliant
D12	<p>Prior to the construction of any wind turbine or wind monitoring mast, the Proponent must provide the following information to CASA and Airservices Australia (together the authorities):</p> <p>(a) co-ordinates in latitude and longitude of each wind turbine and mast;</p> <p>(b) the final height of each wind turbine and mast in Australian Height Datum;</p> <p>(c) ground level at the base of each wind turbine and mast in Australian Height Datum;</p> <p>(d) confirmation of compliance with any OLS; and</p> <p>(e) details of any proposed aviation hazard lighting.</p>	<ul style="list-style-type: none"> - Letter to Civil Aviation Safety Authority (CASA) and Airservices Australia dated 16/08/21 - Letter to DPIE dated 06/09/21 including details of correspondence with CASA and AirServices Australia 	<p>The proponent provided information to CASA and Airservices Australia in accordance with all requirements of this condition.</p>	Compliant
D12A	<p>Within 30 days of the installation of any wind turbine or mast, the Proponent must:</p> <p>(a) provide confirmation to the authorities that the information that was previously provided remains accurate; or</p> <p>(b) update the information previously provided.</p>	<ul style="list-style-type: none"> - Evidence of email correspondence with Airservices Australia with Vertical Obstruction Data for 38 turbines. 	<p>Proponent notified Airservices Australia progressively (as turbines were erected) with confirmation or updated details of information listed in Condition D12.</p>	Compliant

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D13	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.	N/A	N/A – Proponent has advised that this condition has not been triggered	Not triggered
Radio Communication				
D14	<p>Prior to the commencement of construction, the Proponent shall:</p> <p>(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;</p> <p>(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;</p> <p>(c) consider remedial measures, including:</p> <p>i. modification to or relocation of the existing antennae;</p> <p>ii. installation and maintenance of additional radio sites or services;</p> <p>iii. installation of a directional antennae; and / or</p> <p>iv. installation of an amplifier to boost the signal strength</p>	<p>- Letter to DPIE dated 25/01/22 including details of consultation</p> <p>- DPIE acknowledgement receipt dated 07/02/22 with no comment provided</p> <p>- Email correspondence from nbn during May 2024 saying the proposed wind tower locations do not pose any risk of introducing a physical obstruction to existing wireless customer RF Profiles or any boresight paths of existing nbn microwave links.</p>	<p>The proponent consulted with NSW Government Telecommunications Authority, NBN, Forestry Corp NSW, Telstra, Optus, Rural Fire Service NSW, Cadia Holdings, Newcrest Services, Digital Distribution Australia, Essential Energy, Leica Geosystems, McClymont Holdings, NSW Police Force, Ross Byrne, Transport for NSW, Vertical Telecoms, Viasat Australia, Vodafone Australia, Vodafone Hutchison Australia and Water NSW in accordance with the requirements of this condition.</p> <p>As a result of the consultation, no remedial measures were considered necessary.</p> <p>The proponent reported that there had not been any complaints related to radio/telecommunications issues received during the audit period. One person had apparently reported an issue, but it was identified that their nbn aerial had been pointed towards a tree, rather than any interference by a wind turbine.</p>	Compliant
Bushfire Risk				
D15	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 Zones</i>) and provide for necessary emergency management including appropriate fire-fighting equipment and water supplies on site to respond to a bush fire.	<p>Construction Phase:</p> <p>- Bushfire Management Plan (BMP - Construction), Flyers Creek Wind Farm Project (Rev. E, 15/06/20), prepared by Nacap.</p> <p>- DPE approval letter of BMP - Construction (Rev. E, 15/06/20) dated 18/06/20</p> <p>- Flyers Creek Switching Station Civil Design Report (Rev. A, 23/09/22), prepared by Hyne Designs</p> <p>Operation Phase:</p> <p>- (Bush)Fire Management Plan (BMP – Operation), Flyers Creek Wind Farm (Rev. FINAL, 21/11/24), prepared by Australian Bushfire Protection Planners Pty Ltd</p> <p>- FCWF Fire and Emergency Response Plan (Rev. 2.1, 25/06/25)</p>	<p>Construction Phase:</p> <p>Provision for appropriate fire-fighting equipment and water supply/tanks have been provided in the Bushfire Management Plan (Construction) and the Switching Station Design Report.</p> <p>Operation Phase:</p> <p>Provision for appropriate fire-fighting equipment and water supply/tanks have been provided in the Bushfire Management Plan (Operation) and the Fire and Emergency Response Plan.</p>	Compliant


Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>- Mobile firefighting trailer located in the substation compound</p> <p>- Additional Water Storage Tanks installed at the substation compound and under the switch room</p> <p>-Additional Water Storage Tanks installed at the Cadia Road Switching Yard</p>  		
D16	<p>The Proponent shall ensure that the substation and any other new buildings shall be constructed to comply with the Australian Standard AS3959-2009 <i>Construction of buildings in bushfire-prone areas</i>.</p>	<p>- Bushfire Management Plan (BMP), Flyers Creek Wind Farm Project (Rev. E, 15/06/20), prepared by Nacap</p> <p>- DPE approval letter of BMP (Rev. E, 15/06/20) dated 18/06/20</p> <p>- Flyers Creek Wind Farm Substation Switchgear and Control Building Fire Protection Report (Rev. 00, 27/03/23), prepared by psd energy</p> <p>- Essential Energy – Bushfire Risk Assessment for Flyers Creek Windfarm Switching Station (Rev. 1.0, 28/02/22), prepared by RedEye Apps</p>	<p>A Fire Protection Report was issued by PSD Energy which stated that the substation and control and switch room building is adequately protected within the requirements of the standard and National construction code against bush and equipment fires. This report refers to AS3959 as an applicable standard.</p> <p>Essential energy commissioned a report to quantify the bushfire risk for the Switching Station. At the Switching Station, the Bushfire Risk Index was calculated to be “low”.</p>	Compliant
D17	<p>A 10 metre Asset Protection Zone (APZ) shall be provided around the proposed turbines, substation and control building to the standard of an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of <i>Planning for Bushfire Protection 2006 and Standards for Asset Protection Zones</i>.</p>	<p>- Iberdrola 12 Monthly 132kV Vegetation Inspection Checklist completed 03/10/25</p> <p>- Recently completed monthly 10m APZ inspection checklists dated:</p> <ul style="list-style-type: none"> • 25/11/25 	<p>Site based observations and review of checklists confirm that APZ requirements have been incorporated around all 38 turbines, substation and O&M building. Site personnel also check APZ around access roads as part of their monthly checklist.</p>	Compliant


Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> • 23/12/25 • 21/01/26 • 23/12/25 • 25/11/25 <p>- Audit site visit observations</p>		
D18	Sufficient water storage (determined in consultation with the Canobolas Zone Rural Fire Service) shall be provided for fire fighting purposes.	<p>Operation Phase:</p> <ul style="list-style-type: none"> - (Bush)Fire Management Plan (BMP – Operation), Flyers Creek Wind Farm (Rev. FINAL, 21/11/24), prepared by Australian Bushfire Protection Planners Pty Ltd - FCWF Fire and Emergency Response Plan (Rev. 2.1, 25/06/25) - Audit site visit observations - Realtime water level tracking system in place for fire-fighting water tanks with level alerts - Project team correspondence discussing the outcomes of meeting/site visit with RFS <div style="display: flex; flex-direction: column; align-items: center;">   </div>	<p>Ongoing consultation is occurring with RFS, including site visits, to discuss and view firefighting resources.</p> <p>Firefighting water tanks (mobile and static) requirements are discussed in the Bushfire Management Plan and were viewed at the time of audit.</p>	Compliant
D19	Throughout the operational life of the Project, the Proponent shall regularly consult with the Canobolas Zone Rural Fire Service 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 Canobolas Zone Rural Fire Service to reduce the risk of bushfire and to enable fast access in emergencies.	<p>Construction Phase:</p> <ul style="list-style-type: none"> - Presentation and site familiarisation provided on 14/11/24 at Flyers Creek Wind Farm with members and volunteers of the Canobolas Zone Rural Fire Service showing a Project Overview, Site Overviews, Site Access, Fire Management Plan Information, Key Contacts and Key Management Plans. 	<p>Evidence of ongoing consultation with the Canobolas Zone RFS including details of construction timetable and final location of infrastructure.</p> <p>A detailed presentation was provided to the Canobolas Zone RFS on 17/11/25 which included a discussion of fire management. In addition, this presentation was provided to Blayney, Orange and Cabonne Councils.</p>	Compliant

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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> - Presentation and discussion given on 28/05/25 at the Canobolas Zone RFS Command with members NSW Police, Ambulance, Fire and Rescue and RFS including other regulatory bodies, showing a Project Overview, Site Overviews, Site Access, Fire Management Plan Information, Key Contacts, Turbine Rescue and Key Management Plans (submitted to DPHI on 16/07/25) Operation Phase: - (Bush)Fire Management Plan (BMP – Operation), Flyers Creek Wind Farm (Rev. FINAL, 21/11/24), prepared by Australian Bushfire Protection Planners Pty Ltd - FCWF Fire and Emergency Response Plan (Rev. 2.1, 25/06/25) - Correspondence from Iberdrola to Canobolas Zone RFS dated 25/08/25 discussing process for turbines and power lines to be switched off in a fire and contact details - Correspondence between FCWF and Canobolas Zone RFS organising a meeting in October 2025 - Presentation given to Canobolas Zone RFS on 18/11/25 		
VISUAL AMENITY				
Views				
D20	<p>For a period of 5 years from the commencement of construction of any wind turbine, the owner of any non-associated residence within 4 km of any wind turbine may ask the Proponent to implement visual impact mitigation measures on their land to minimise the visual impacts of the project on their residence (including its curtilage).</p> <p>Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner.</p> <p>These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the wind turbines from the residence and its curtilage, and commensurate with the level of visual impact on the residence.</p> <p>All mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.</p>	<ul style="list-style-type: none"> - Complaints register (noted to be sufficiently detailed and up to date) - Design sketches showing view of existing conditions, view with vegetation screening planted and also view at 10 years after plantings - Photos of vegetation screening planted - Email correspondence with one owner of a residence regarding vegetation screening and plant selection 	<p>Three near neighbours complained about visual amenity. Plantings were offered to all three complainants, however only one of the complainants accepted the offer.</p> <p>Trees have been planted at the neighbour who accepted the offer.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of wind turbines from any other locations on the property other than the residence and its curtilage. The identification of appropriate visual impact mitigation measures will be more effective following the construction of the wind turbines. While owners may ask for the implementation of visual impact mitigation measures shortly after the commencement of the erection of the turbine, they should consider the merits of delaying this request until the relevant wind turbines are visible from their residence. 			
D21	<p>Landscaping works to reduce the visual impact of the Project shall generally comprise of indigenous and locally occurring species.</p>	<ul style="list-style-type: none"> - Design and Landscape Plan (DALP), Flyers Creek Wind Farm (Rev. F, 25/08/23), prepared by Iberdrola. - DPHI approval letter of DALP (Rev. F, 25/08/23) dated 25/11/24 - Invoices showing purchase of indigenous and locally occurring species - Google Earth file showing areas of tree plantings - Audit site visit observations 	<p>Section 5 and Table 6 and of the DALP provide details of native species that will be used for landscaping as found in the nearby Boxgum Woodland EEC.</p> <p>Invoices supplied by proponent provided details of planting of indigenous and locally occurring species including <i>Eucalyptus blakelyi</i>, <i>Eucalyptus melliodora</i>, <i>Eucalyptus goniocalyx</i>, <i>Eucalyptus Bridgesiana</i></p> <p>Landscaping works were viewed at various location during the audit site visit. Planting and ground-cover were noted to be thriving.</p>	Compliant
Visual Appearance				
D22	<p>The Proponent must:</p> <p>(a) minimise the off-site visual impacts of the project;</p> <p>(b) ensure the wind turbines are:</p> <ul style="list-style-type: none"> • painted off white/grey, unless otherwise agreed by the Planning Secretary; and • finished with a surface treatment that minimises the potential for glare and reflection; <p>(c) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and</p> <p>(d) not mount any advertising signs or logos on wind turbines or ancillary infrastructure.</p>	<ul style="list-style-type: none"> - Design and Landscape Plan (DALP), Flyers Creek Wind Farm (Rev. F, 25/08/23), prepared by Iberdrola. - DPHI approval letter of DALP (Rev. F, 25/08/23) dated 25/11/24 - Audit site visit observations 	<p>The DALP provides details of how the specific requirements of this condition will be met.</p> <p>The auditor’s inspection of wind turbine infrastructure confirmed that it was painted in an off-white, low-glare paint and there were no advertising signs of logos present.</p> <p>The O&M facility and substation infrastructure was noted to be finished in pale grey to meet the requirements of solar absorptance and be consistent with turbine infrastructure. The position of the substation was naturally screened to sensitive receivers based on its position in the landscape which breaks up lines of site.</p> <p>Screening plantings were observed to be in place.</p>	Compliant

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Shadow Flicker				
D23	Shadow flicker from the Project must not exceed 30 hours / annum at any non-associated residence.	<p>- Shadow Flicker Briefing Note (Rev C, 09/02/26), prepared by Moir Studio for Umwelt (Australia) on behalf of Iberdrola which consisted of:</p> <ul style="list-style-type: none"> • A peer review of the existing shadow flicker reports prepared in 2010 and 2018 • preparation of a contemporary shadow flicker assessment 	<p>The contemporary (2026) shadow flicker assessment was prepared using shadow flicker guidance from the DPHI <i>Wind Energy Guideline (2024)</i> which superseded the DPI <i>Draft NSW Planning Guidelines for Wind farms (2011)</i>. One major change from the 2011 guideline to the 2024 guideline was the distance of residences to be included in the study area. The distance was 2km from a WTG in 2011 and a calculated distance of 1.063km from a WTG in 2024, which is less distance.</p> <p>The 2026 assessment notes that no dwellings are within the study area of the FWCW project, i.e. within 1.063km from a WTG and therefore shadow flicker modelling is not required. However, they note there is one dwelling located beyond the study area where the effects of shadow flicker could be greater than 30 hours/annum for the worst case scenario, however when mitigation parameters are applied, the modelled value is less than 30 hours/annum and within other relevant parameters of the 2024 guidelines.</p>	Compliant
Substation				
D24	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 D25.	<p>- Design and Landscape Plan (DALP), Flyers Creek Wind Farm (Rev. F, 25/08/23), prepared by Iberdrola</p> <p>- DPHI approval letter of DALP (Rev. F, 25/08/23) dated 25/11/24</p> <p>- Audit site visit observations</p>	<p>The DALP provides details of how the specific requirements of this condition will be met.</p> <p>The O&M facility and substation infrastructure was noted to be finished in pale grey to meet the requirements of solar absorptance and be consistent with turbine infrastructure. The position of the substation was naturally screened to sensitive receivers based on its position in the landscape which breaks up lines of site.</p> <p>Screening plantings were in place.</p>	Compliant
Switching Station				
D24A	Prior to the commencement of the construction of the switching station, the Proponent must submit a copy of the final layout plan for the switching station to the Planning Secretary for approval. This plan must outline the proposed measures to minimise the visual impacts of the switching station on any non-associated residences in the vicinity of the switching station, including retaining existing vegetation buffers in and adjoining the	<p>- Final Switching Station Landscape Plan, Flyers Creek Wind Farm (Iberdrola letter dated 06/03/23)</p> <p>- DPE approval letter of Final Layout Plan for Switching Station (06/03/23) dated 21/03/23</p>	The final layout plan for the switching station was approved prior to commencement of construction of the switching station and provides details of the requirements of this condition.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>forest to screen views of the switching station or planting additional screening around the switching station.</p> <p>The Proponent must not construct the switching station before this plan has been approved by the Planning Secretary.</p>	<p>- Proponent reported that first permanent foundations for the switching yard commenced in April 2023</p>	<p>The auditor notes that the plan includes consultation with property owners within 1km of the original assessment area and an additional distant property owner. It is further noted that the plan has been revised three (3) times to provide enhanced visual impact mitigation to adjacent sensitive receivers while complying with the specific bushfire risk management measures required by Essential Energy.</p>	
Night Lighting				
D25	<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 Planning Secretary, or required by CASA.</p> <p>Prior to the commencement of construction, the Proponent shall consult with CASA on the need for aviation hazard lighting in relation to the wind turbines. The Proponent shall ensure any aviation hazard lighting installed utilises an aircraft detection lighting system unless otherwise agreed by CASA.</p>	<p>- Letter to CASA dated 08/01/20</p> <p>- CASA response dated 09/01/20</p> <p>- DPIE acknowledgement of CASA consultation dated 10/01/20</p> <p>- Consultation with Essential Energy (EE) regarding switching station lighting</p>	<p>Correspondence from CASA confirmed that no aviation hazard lighting is required for the wind turbines.</p> <p>EE provided information that lighting in the switching station would only be used for emergency unplanned maintenance as planned maintenance would occur during daytime hours. EE would look to minimise any light pollution, using yellow lights and ensuring they were only focused on equipment in the yard as necessary.</p>	Compliant
Design and Landscape Plan				
D26	<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 the Councils. The Plan shall include design treatments for the turbines and ancillary infrastructure, including, but not necessarily limited to:</p> <p>(a) landscape elements and built elements, including proposed treatments, finishes and materials of exposed surfaces (including colour specifications);</p> <p>(b) lighting;</p> <p>(c) a schedule of species to be used in landscaping;</p> <p>(d) details of the timing and progressive implementation of landscape works; and</p> <p>(e) procedures and methods to monitor and maintain landscaped areas.</p> <p>The Plan shall be submitted for the approval of the Planning Secretary prior to the commencement of construction, unless otherwise agreed by the Planning Secretary.</p>	<p>- Design and Landscape Plan (DALP), Flyers Creek Wind Farm (Rev. F, 25/08/23), prepared by Iberdrola.</p> <p>- DPHI approval letter of DALP (Rev. F, 25/08/23) dated 25/11/24</p> <p>- Progressive photos of tree plantings at screening areas at several locations, including the switching yard</p>	<p>The DALP was prepared by a Registered Landscape Architect and member of the Institute of Landscape Architects and consultation occurred with Blayney Shire Council and Cabonne Council.</p> <p>Screening plantings were in place.</p>	Compliant



Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> - FCWF Collector Group 2 Access Tracks Rehabilitation Inspection, prepared by ecology & heritage partners (Version 1, 21/03/23) - FCWF Collector Group 3 Access Tracks Rehabilitation Inspection, prepared by ecology & heritage partners (Version 1, 15/02/23) 		
UTILITIES AND SERVICES				
D27	Utilities, services and other infrastructure potentially affected by construction and operation shall be identified prior to the commencement of relevant construction works 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.	<ul style="list-style-type: none"> - Correspondence with APA Group regarding excavation and concreting works where access road crosses gas line - Correspondence with Telstra regarding realignment of telecommunication lines for new site access roads 	Works were conducted in conjunction with APA Group and Telstra to protect and support affected gas and telecommunications infrastructure.	Compliant
WASTE MANAGEMENT				
D28	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.	<ul style="list-style-type: none"> - Audit site visit observations - Correspondence from proponent confirming that no waste generated outside of site has been received at the site for any purpose. 	<p>The proponent reported that no waste generated outside the site had been received at the site for any purpose.</p> <p>During the audit site visit no evidence of the presence of waste generated outside of the site was noted.</p>	Compliant
D29	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.	<ul style="list-style-type: none"> - Audit site visit observations - Waste management protocols reviewed as part of routine site inspections - Waste register extract from 13/03/24 to 21/01/26 	<p>Excellent sorting and segregation of wastes was noted on site and evidence of re-use of materials such as excavated rock for use in road and drainage construction was noted.</p> <p>Waste register extract viewed which showed segregated disposal of General Waste, Recycling, Septic Waste, Waste Oil, Oil Filters, Waste Grease, Oily Rags, Batteries and Steel.</p>	Compliant



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D30	The Proponent shall ensure that no green waste associated with the Project is burnt on site during the life of the Project.	<ul style="list-style-type: none"> - Audit site visit observations - Correspondence from proponent confirming that no green waste associated with the project is burnt on site 	No evidence of burning of green waste noted on site. The proponent confirmed that no green waste is burned on-site.	Compliant
D31	The Proponent shall ensure that all liquid and / or non-liquid waste generated on the site is assessed and classified in accordance with <i>Waste Classification Guidelines</i> (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.	<ul style="list-style-type: none"> - Audit site visit observations - Operational Environmental Management Plan (OEMP), Flyers Creek Wind Farm Project (Rev. 01, 19/05/02), prepared by Iberdrola. - DPHI conditional approval letter of OEMP (Rev. 1, 19/05/25) dated 06/06/25 - Waste register extract from 13/03/24 to 21/01/26 	<p>The proponent reported that no regulated wastes have been transported off-site.</p> <p>Waste register extract viewed by Auditor and correctly filled in. Waste register is in accordance with commitments in Section 10.5 of the OEMP.</p>	Compliant
PROPERTY IMPACTS				
Crown Land				
D32	Prior to the commencement of construction of the Project, the Proponent shall consult with and comply with the requirements of the DoI – L&W in relation to any Crown land affected by the Project to enable the lawful use of that land by the Project.	<ul style="list-style-type: none"> - DPE Crown Lands Licence RN 606166 executed on 01/11/19. - Letter to DPIE dated 26/08/21 showing compliance with this condition - DPIE acknowledgement dated 15/09/21 with no comment provided 	The proponent consulted with DPE Crown Lands (formerly DoI – L&W) in regard to this condition and was granted a Licence on 01/11/19, prior to the commencement of construction.	Compliant
Trigonometric Reserves				
D33	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.	<ul style="list-style-type: none"> - Audit site visit observation - Construction Heritage Management Plan (CHMP), Flyers Creek Wind Farm Project (Rev. F, 10/06/20), prepared by Nacap. - DPE approval letter of CHMP (Rev. F, 10/06/20) dated 18/06/20 	<p>One (1) trigonometric station, Hopkins Trigonometric Station, is located within the project boundary and protection of this station is discussed in Section 4.4.1 of the CHMP.</p> <p>Site observations during the audit confirmed the Hopkins Trigonometric Station had not been disturbed and protection measures were in place.</p>	Compliant
Mineral Resources				



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D34	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.	<ul style="list-style-type: none"> - Letter to DPIE dated 24/11/21 showing compliance with this condition - DPIE acknowledgement of consultation dated 10/12/21 	The proponent has consulted with the NSW Mining, Exploration and Geoscience Division (formerly Division of Resources & Geoscience) and the three holders of (or applicants for) mineral, mining and exploration titles or tenements which overlap with the project boundary. This consultation began in 2019, prior to the commencement of construction.	Compliant
SCHEDULE E – COMMUNITY INFORMATION, REPORTING AND AUDITING				
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT				
Community Consultative Committee				
E1	From the commencement of construction, the Proponent must operate a CCC for the Project to the satisfaction of the Planning Secretary , in accordance with the Community Consultative Committee Guidelines for State Significant Projects (2016) , or its latest version.	<ul style="list-style-type: none"> - Project website (viewed 05/03/26): https://www.iberdrola.com.au/our-assets/asset-map/operating-renewable-energy-assets/flyers-creek-wind-farm - Meeting minutes of 10/11/25 meeting - DPE approval of Chair of Community Consultative Committee (dated 02/07/15) 	<p>A Community Consultation Committee (CCC) was established in 2012 and the first meeting was held on 06/12/12, prior to the commencement of construction. There have been 39 meetings with the most recent meeting held on 10/11/25. Links to all meeting minutes are provided on the project website.</p> <p>Minutes for the meeting of 10/11/25 were formally presented with an agenda and list of actions (and open/closed status). It is noted that representatives of the proponent and Blayney Shire Council were in attendance, alone with neighbours and host landowners.</p> <p>The Chair of the CCC was endorsed by DPE.</p>	Compliant
Complaints and Enquiries Procedure				
E2	<p>Prior to the commencement of construction, or as otherwise agreed by the Planning 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 Planning Secretary:</p> <p>(a) a 24 hour telephone number(s) on which complaints and enquiries about the Project may be registered;</p> <p>(b) a postal address to which written complaints and enquires may be sent;</p> <p>(c) an email address to which electronic complaints and enquiries may be transmitted; and</p> <p>(d) a complaints management and mediation system for complaints unable to be resolved, inclusive of a mechanism for complaints to be directed to the Department where the issue cannot be resolved by the Proponent and/or through mediation.</p> <p>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.</p>	<ul style="list-style-type: none"> - Project website (viewed 05/03/26): https://www.iberdrola.com.au/our-assets/asset-map/operating-renewable-energy-assets/flyers-creek-wind-farm - Newspaper notice in The Western Advocate dated 09/08/25 	<p>Contact details, including a 24 hour telephone number and postal and email addresses, are currently listed on the project website under a “Contact Us” link (as of 05/03/26).</p> <p>Non-compliance No. 2 (FCWF-IEA2-NC2): Contact details were published in a local newspaper, The Western Advocate, however the date of publication (09/08/25) was after commencement of operation (11/07/25).</p> <p>Recommendation No. 2 (FCWF-IEA2-R2): The compliance tracking program should be reviewed to ensure that future notification deadlines are met.</p>	Non-compliant

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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E3	<p>Prior to the commencement of construction, or as otherwise agreed by the Planning Secretary, the Proponent shall prepare and implement a Complaints Management System consistent with <i>AS 4269: Complaints Handling</i> and maintain the System for the life of the Project.</p> <p>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 Planning Secretary on request.</p>	<ul style="list-style-type: none"> - FCWF Complaints Management Procedure (for Construction), Rev 0D, 28/07/22, prepared by Iberdrola - Operational Environmental Management Plan (OEMP), Flyers Creek Wind Farm Project (Rev. 01, 19/05/02), prepared by Iberdrola. - DPHI conditional approval letter of OEMP (Rev. 1, 19/05/25) dated 06/06/25 - Complaints Register (covering period of 01/05/23 to 26/02/26) 	<p>The Complaints Management Procedure (for Construction) was developed to be consistent with the Australian Standard.</p> <p>Section 5.11 of the OEMP also provides details regarding complaints management.</p> <p>A copy of the Complaints Register was provided to the Auditor covering the period from the last audit (01/05/23) to present (26/02/26).</p> <p>A detailed discussion of the nature (and close-out status) of the complaints listed within the Complaints Register is provided within Section 4.9 of this audit report.</p>	Compliant
Provision of Electronic Information				
E4	<p>Prior to the commencement of construction, or as otherwise agreed by the Planning 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:</p> <ul style="list-style-type: none"> (a) information on the current implementation status of the Project; (b) a copy of the documents referred to under condition C2 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 E5 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. 	<ul style="list-style-type: none"> - Project website (viewed 05/03/26): https://www.iberdrola.com.au/our-assets/asset-map/operating-renewable-energy-assets/flyers-creek-wind-farm 	<p>A review undertaken on 05/03/26 determined that the project website was up to date with all requirements of the sub-conditions as follows:</p> <p>E4(a): The main page of the website provided details of operational status and outputs of the project and the Community Consultation Committee and Community Benefit Fund. Also included was a video of the project under construction and a photo gallery which is a good initiative. In addition, under the “Newsletters & Notices” tab, there was a link to a January 2026 Community notice regarding road repairs.</p> <p>E4(b) and (c): A link to the DPHI planning portal was provided under the “Project Approval Documents” tab which provides access to copies of the EA and Project Approval (including modification documents)</p> <p>E4(d): A link to the Environment Protection Licence was provided within the “Project Approval Documents” tab</p> <p>E4(e): Links to copies of each plan and document required by the Project Approval were provided within the “Project Approval Documents” tab, including Operational phase and Construction phase documents and notifications</p> <p>E4(f): A link to the Compliance Tracking Programme and Pre-Operations Compliance Report was provided within the “Project Approval” tab.</p> <p>E4(g): Contact details for community complaints or feedback, including telephone number, post address and email address, were provided within the “Complaints Register” tab</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
COMPLIANCE MONITORING AND TRACKING				
Compliance Tracking Program				
E5	<p>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 Planning 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:</p> <p>(a) provisions for the notification of the Planning 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);</p> <p>(b) provisions for periodic review of the compliance status of the Project against the requirements of this Approval;</p> <p>(c) provisions for periodic reporting of compliance status to the Planning Secretary, including a Pre-Construction Compliance Report, during construction reporting, and a Pre-Operation Compliance Report;</p> <p>(d) a program for independent environmental auditing in accordance with ISO 19011:2003 - Guidelines for Quality and / or Environmental Management Systems Auditing;</p> <p>(e) mechanisms for recording environmental incidents during construction, and actions taken in response to those incidents;</p> <p>(f) provisions for reporting environmental incidents to the Planning Secretary and relevant public authorities (including Blayney Shire Council) during construction and for the life of the Project;</p> <p>(g) procedures for rectifying any non-compliance identified during environmental auditing, and review of compliance or incident management; and</p> <p>(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.</p>	<ul style="list-style-type: none"> - Corrective Actions Register - Compliance Tracking Program (CTP), Flyers Creek Wind Farm (Rev. 2, 23/09/21), prepared by Arcadis - DPE approval letter for CTP (Rev. 2, 23/09/21) dated 24/09/21 - Pre-Operations Compliance Report (POCR), Flyers Creek Wind Farm (10/07/25), prepared by Jacobs for Iberdrola - DPHI acknowledgement of POCR dated 15/07/25 - Incident Register from 21/11/23 to 26/02/26 - Flyers Creek Wind Farm HSE Induction - Final V2 (23/10/24) - Extract showing active inducted user list - Draft version (Rev. 3) of Compliance Tracking Program 	<p>The CTP was approved by DPE prior to the commencement of construction.</p> <p>An update to the CTP (Rev. 3) was underway, at the time of preparation of this report, to make the CTP more relevant to the operational phase of the project.</p> <p>The POCR was issued to DPHI prior to the commencement of operation.</p> <p>A copy of the Incident Register (covering period of 21/11/23 to 26/02/26) was provided to the Auditor and a discussion of the nature (and close-out status) of the environmental incidents listed are provided within Section 4.10 of this audit report.</p> <p>A copy of the site induction was reviewed by the auditor which referred to the conditions of Approval. An extract was also viewed which showed the list of project personnel and subcontractors currently inducted.</p>	Compliant
Incident Notification				
E6	<p>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, and set out the location and nature of the incident.</p>	<ul style="list-style-type: none"> - Incident Register from 21/11/23 to 26/02/26 	<p>A copy of the Incident Register (covering period of 21/11/23 to 26/02/26) was provided to the Auditor and further discussion is provided within Section 4.10 of this audit report.</p> <p>No incidents were reported to DPHI during the audit period, however DPHI considered that one (1) notifiable incident occurred during the audit period related to blade damage.</p> <p>Non-compliance No. 3 (FCWF-IEA2-NC3): A turbine blade breakage, which occurred due to a lightning strike, was considered by the Department of Planning, Housing and Infrastructure (DPHI) to be a reportable incident due to the potential to cause "Material harm to the environment" (as defined in the Infrastructure Approval). The incident was not reported to DPHI immediately, in accordance with Infrastructure Approval Condition E6.</p> <p>Recommendation No. 3 (FCWF-IEA2-R3): The proponent should review the incident reporting mechanisms provided in the Compliance Tracking Program and the OEMP to</p>	Non-compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252


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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
			ensure any future incidents of a similar nature are reported to the Department, in accordance with Condition E6.	
Non-Compliance Notification				
E7	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 with the conditions of this approval. 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.		The proponent did not report any non-compliances with the conditions of the approval to DPHI during the Audit period.	Compliant
AUDITING				
E8	<p>Within 1 year of the commencement of construction, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p> <p>(a1) be prepared in accordance with the relevant <i>Independent Audit Post Approval Requirements</i> (DPE 2018, or its latest versions);</p> <p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the project and whether it complies with the relevant requirements in this approval;</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned approval; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under this approval.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • This audit team must be led by a suitably qualified auditor and/or experts in any other fields specified by the Planning Secretary. • The Department's <i>Independent Audit Guideline for State Significant Development</i> provides an audit and reporting framework for the independent audit that will guide compliance with this condition. 	<ul style="list-style-type: none"> - This second Independent Environmental Audit report (3 years after the previous audit) - DPHI Approval of Audit Team for second audit (13/01/26) - Independent Environmental Audit report No. 1, June 2023 (within 1 year of commencement of construction) 	<p>The first Audit was commissioned within 1 year of the commencement of construction.</p> <p>The second Audit (this audit) was commissioned 3 years after the first audit and the Audit Team were endorsed by the Planning Secretary.</p> <p>Both audits were conducted in accordance with the requirements of this condition and the <i>Independent Audit Post Approval Requirements</i> (DPIE 2020).</p>	Compliant
E9	Within 3 months of commissioning this audit, or as otherwise agreed by the Planning Secretary , the Proponent must submit a copy of the audit report to the Planning Secretary , together with its response to any recommendations contained in the audit report and a timetable for the implementation of these recommendations as required.	<ul style="list-style-type: none"> - Independent Environmental Audit (IEA) No. 1 report: "Flyers Creek Wind Farm (MP 08_0252) Independent Environmental Audit No. 1 Report (within 1 year of the commencement of construction), Rev.1, 09/06/23", prepared by Vantage Environmental Management - Response to Audit Recommendations (RAR) for IEA No. 1: "Flyers Creek Wind Farm (MP 08_0252) Independent Environmental Audit Action Response Plan, 29/06/23" - DPHI letter response to Proponent dated 07/07/23 noting receipt of IEA No. 1 audit report and RAR. 	<p>IEA No. 1 was commissioned on 21/04/23 and the Proponent submitted a copy of audit report and Proponent's response on 29/06/23, which is within the 3 month timeframe. The Proponent provided actions and due dates for implementation of recommendations and opportunities for improvement identified in IEA No. 1.</p> <p>This second IEA audit report and the Proponent's response will be required to be submitted to the Planning Secretary by 11/05/26, as the audit was commissioned on 11/02/26.</p>	Compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E10	The Proponent must implement these recommendations to the satisfaction of the Planning Secretary .	<ul style="list-style-type: none"> - Response to Audit Recommendations (RAR) for IEA No. 1: "Flyers Creek Wind Farm (MP 08_0252) Independent Environmental Audit Action Response Plan, 29/06/23" - Iberdrola letter to DPE dated 17/08/23 providing evidence of implementation Audit No.1 recommendations (associated with non-compliances) - Iberdrola letter to DPE dated 31/08/23 providing evidence of implementation of Audit No.1 opportunities for improvement 	Iberdrola issued evidence of implementation of Audit No. 1 to DPE during August 2023 and met their action due dates as provided in their Action Response Plan.	Compliant
Revision of Strategies, Plans and Programs				
E11	<p>Within 3 years of the commencement of the operation of the project, or within 3 months of the submission of an:</p> <p>(a) incident report under condition E6; (b) audit under condition E8; 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 Planning Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</i></p>	<ul style="list-style-type: none"> - Iberdrola letter to DPE dated 17/08/23 providing evidence of implementation Audit No.1 recommendations (associated with non-compliances) - Iberdrola letter to DPE dated 31/08/23 providing evidence of implementation of Audit No.1 opportunities for improvement 	A review of the construction management plans following the first Independent Environmental Audit was undertaken. A compliance audit check was undertaken and the proponent determined that no updates to the plans were required.	Compliant
SCHEDULE F – CONSTRUCTION ENVIRONMENTAL MANAGEMENT				
DUST GENERATION				
F1	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.	<ul style="list-style-type: none"> - Construction Air Quality Management Plan (CAQMP), Flyers Creek Wind Farm Project (Rev. D, 05/05/20), prepared by Nacap. - DPE approval letter of CAQMP (Rev. D, 05/05/20) dated 08/05/20 - Operational Environmental Management Plan (OEMP), Flyers Creek Wind Farm Project (Rev. 01, 19/05/02), prepared by Iberdrola. - DPHI conditional approval letter of OEMP (Rev. 1, 19/05/25) dated 06/06/25 - Audit site visit observations 	<p>Construction dust (and air quality) management and mitigation measures are discussed in the CAQMP.</p> <p>Operational dust (and air quality) management and mitigation measures are discussed in the OEMP.</p> <p>At the time of the audit site visit no significant dust emissions were noted. All viewed area were well stabilised to minimise potential dust generation and a water-spray fitting was present on a mobile water tank for use if dust suppression was required.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
				
HERITAGE				
F2	In undertaking the Project, impacts to heritage, shall to the greatest extent practicable, be avoided and minimised. 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 F21(e).	<ul style="list-style-type: none"> - Construction Heritage Management Plan (CHMP), Flyers Creek Wind Farm Project (Rev. F, 10/06/20), prepared by NACAP. - DPHI approval letter of CHMP (Rev. F, 10/06/20) dated 18/06/20 - Reburial confirmation letter of artefacts dated 04/03/26 by Austral Archaeology. - Iberdrola toolbox talks dated 02/02/26 and 27/02/26 	<p>The auditor understands that impacts to heritage were, to the greatest extent practicable, avoided and minimised during construction and operation of the project.</p> <p>Construction works were undertaken in accordance with the DPHI-approved Construction Heritage Management Plan.</p> <p>Evidence was provided to the Auditor of recent toolbox talks with operational personnel regarding cultural heritage sites.</p> <p>Recently, artefacts reburial was undertaken by a member of the Orange Local Aboriginal Land Council, who requested the artefacts be reburied in 2 locations based on their original deposition.</p>	Compliant
NOISE AND VIBRATION				
Construction Hours				
F3	Unless the Planning Secretary agrees otherwise, construction activities associated with the Project shall be undertaken during the following standard construction hours: (a) 7:00am to 6:00pm Mondays to Fridays; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays.	<ul style="list-style-type: none"> - DPHI-approved CEMP - Site Inductions - Discussions with site personnel 	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>Approved construction hours were listed within Section 3.2 of the CEMP.</p> <p>Site induction lists construction hours and approved construction hours were monitored by Construction Manager and Environment Manager. In addition, approved construction hours were discussed as part of induction and toolbox training sessions.</p>	Compliant
F4	Construction works outside of the standard construction hours identified in condition F3 may be undertaken in the following circumstances: (a) construction works that generate noise that is: (i) no more than 5 dB(A) above rating background level at any residence in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009); and (ii) no more than the noise management levels specified in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) at other sensitive receivers; or	<ul style="list-style-type: none"> - Construction Noise and Vibration Management Plan (CNVMP), Flyers Creek Wind Farm Project (Rev. D, 11/05/20), prepared by Nacap including Out of Hours Works Protocol - DPHI approval letter of CNVMP (Rev. D, 11/05/20) dated 14/05/20 	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CNVMP, inclusive of OOHW protocol, was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan.</p>	Compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status						
	(b) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property and / or to prevent environmental harm; or (d) works approved through an EPL; or (e) works as approved through the out-of-hours work protocol outlined in the Construction Noise and Vibration Management Plan required under condition F21(b).									
F5	Except as expressly permitted by the EPL, activities resulting in impulsive or tonal noise emission (such as rock breaking, rock hammering, pile driving) shall only be undertaken: (a) between the hours of 8:00 am to 5:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) in continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block. For the purposes of this condition ‘continuous’ includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work the subject of this condition.	- DPHI-approved CEMP - Site Inductions - Discussions with site personnel	Construction phase condition only. The project has been operational since July 2025. Approved construction hours were listed within Section 3.2 of the CEMP. Site induction lists construction hours and approved construction hours were monitored by Construction Manager and Environment Manager. In addition, approved construction hours were discussed as part of induction and toolbox training sessions.	Compliant						
Construction Noise and Vibration										
F6	The Project shall be constructed with the aim of achieving the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (DECC, 2009). All feasible and reasonable noise mitigation measures shall be implemented and any activities that could exceed the construction noise management levels shall be identified and managed in accordance with the Construction Noise and Vibration Management Plan required under condition F21(b). <i>Note: The Interim Construction Noise Guideline identifies ‘particularly annoying’ activities that require the addition of 5dB(A) to the predicted level before comparing to the construction noise management levels.</i>	- Attended noise monitoring reports	Construction phase condition only. The project has been operational since July 2025. The CNVMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan.	Compliant						
F7	The Project shall be constructed with the aim of achieving the following construction vibration goals: (a) for structural damage, the vibration limits set out in the German Standard <i>DIN 4150-3: Structural Vibration - effects of vibration on structures</i> ; and (b) for human exposure, the acceptable vibration values set out in the <i>Environmental Noise Management Assessing Vibration: A Technical Guideline</i> (DEC, 2006).	- Attended noise monitoring for ground vibration	Construction phase condition only. The project has been operational since July 2025. The CNVMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan.	Compliant						
F8	Airblast overpressure generated by blasting associated with the Project shall not exceed the criteria specified in Table 1 when measured at the most affected residence or other sensitive receiver. Table 1- Airblast overpressure criteria	- Noise and vibration monitoring	Construction phase condition only. The project has been operational since July 2025. The CNVMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan.	Compliant						
<table border="1"> <thead> <tr> <th>Airblast overpressure (dB(Lin Peak))</th> <th>Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td>115</td> <td>5% of total number of blasts over a 12 month period</td> </tr> <tr> <td>120</td> <td>0%</td> </tr> </tbody> </table>		Airblast overpressure (dB(Lin Peak))	Allowable exceedance	115	5% of total number of blasts over a 12 month period	120	0%			
Airblast overpressure (dB(Lin Peak))	Allowable exceedance									
115	5% of total number of blasts over a 12 month period									
120	0%									

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status											
F9	<p>Ground vibration generated by blasting associated with the Project shall not exceed the criteria specified in Table 2 when measured at the most affected residence or other sensitive receiver.</p> <p>Table 2 – Peak particle velocity criteria</p> <table border="1"> <thead> <tr> <th>Receiver</th> <th>Peak particle velocity (mm/s)</th> <th>Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Residence on privately owned land</td> <td>5</td> <td>5% of total number of blasts over a 12 month period</td> </tr> <tr> <td>10</td> <td>0%</td> </tr> <tr> <td>Historic heritage item</td> <td>3</td> <td>0%</td> </tr> </tbody> </table>	Receiver	Peak particle velocity (mm/s)	Allowable exceedance	Residence on privately owned land	5	5% of total number of blasts over a 12 month period	10	0%	Historic heritage item	3	0%	- Noise and vibration monitoring	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CNVMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan.</p>	Compliant
Receiver	Peak particle velocity (mm/s)	Allowable exceedance													
Residence on privately owned land	5	5% of total number of blasts over a 12 month period													
	10	0%													
Historic heritage item	3	0%													
PROPERTY IMPACTS															
F10	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.	<ul style="list-style-type: none"> - Landholders interaction Register (entries from 17/03/22 to 12/04/23) - Landowner walkdowns progress sheet - Landowner rectification lists - Database to capture and track items 	<p>The proponent advised that access to private properties has been maintained. Farmers gates, fencing and cattle grids have been reinstated in consultation with respective landowners.</p> <p>The audit reviewed the Landholders Interaction Register and it appeared to be filled in clearly and found it to be thorough. Some close-out actions remain to be completed as they are longer term rectifications.</p> <p>Operational site management team have focussed on building good relationships with property owners.</p>	Compliant											
F11	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.	<ul style="list-style-type: none"> - Landholders interaction Register (entries from 17/03/22 to 12/04/23) - Complaints register 	<p>The audit reviewed the Landholders Interaction Register and it appeared to be filled in clearly and found it to be thorough. Some close-out actions remain to be completed as they are longer term rectifications.</p> <p>Operational site management team have focussed on building good relationships with property owners.</p>	Compliant											
SOIL, WATER QUALITY AND HYDROLOGY															
Construction Soil and Water Management															
F12	Soil and water management measures consistent with <i>Managing Urban Stormwater - Soils and Construction Vols 1 and 2, 4th Edition</i> (Landcom, 2004), or its latest version, shall be employed during the construction of the Project to minimise soil erosion and the discharge of sediment and other pollutants to land and / or waters.	<ul style="list-style-type: none"> - Construction Soil and Water Quality Management Plan (CSWQMP), Flyers Creek Wind Farm Project (Rev. E, 25/06/20), prepared by Nacap. - DPE approval letter of CSWQMP (Rev. E, 25/06/20) dated 03/07/20 - Erosion and Sediment Control Plans 	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CSWQMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan.</p>	Compliant											

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

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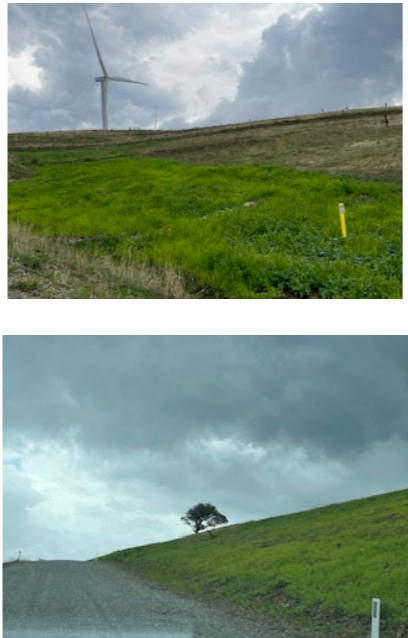
Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
F13	Where available, and of appropriate chemical and biological quality, stormwater, recycled water or other water sources shall be used in preference to potable water for construction activities, including concrete mixing and dust control.	- Construction Soil and Water Quality Management Plan (CSWQMP), Flyers Creek Wind Farm Project (Rev. E, 25/06/20), prepared by Nacap. - DPE approval letter of CSWQMP (Rev. E, 25/06/20) dated 03/07/20	Construction phase condition only. The project has been operational since July 2025. The CSWQMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan.	Compliant
F14	Construction activities within 40 metres of any watercourses, shall be consistent with the <i>Controlled Activity Guidelines</i> (NSW Office of Water, 2012) including, but not limited to, 'In-stream Works', 'Outlet Structures', 'Riparian Corridors', 'Vegetation Management Plans', and 'Watercourse Crossings', or any guidelines which supersede these documents.	- Construction Soil and Water Quality Management Plan (CSWQMP), Flyers Creek Wind Farm Project (Rev. E, 25/06/20), prepared by Nacap. - DPE approval letter of CSWQMP (Rev. E, 25/06/20) dated 03/07/20 - Consultation with DPI Fisheries in relation to construction works in close proximity to Flyers Creek (dated 23/01/23)	Construction phase condition only. The project has been operational since July 2025. The CSWQMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan. Consultation was undertaken with DPI Fisheries during 2023 to confirm their requirements were met with respect to site works.	Compliant
TRAFFIC AND TRANSPORT				
Designated Heavy and Over-Dimensional Vehicle Routes				
F15	Unless otherwise agreed by the Planning Secretary , prior to the commencement of construction, the Proponent must commission an independent, qualified person(s) to identify the proposed transport routes for all heavy and over-dimensional vehicle access to and from the site and agree on these routes in writing with the relevant road authority. <i>Note: These routes will form part of the haulage route to be surveyed as required by condition F16.</i>	- Route Survey Report (October 2021), prepared by ARES Group - Letter to DPE dated 09/11/21 providing evidence of compliance with this condition - DPIE receipt dated 26/11/21	ARES Group, who are independent and suitably qualified, undertook a route survey for designated heavy and over-dimensional vehicle access to and from site. Written agreement was provided by the relevant road authorities including: <ul style="list-style-type: none"> • Transport for NSW • Wollongong Council • Wollondilly Council • Wingecaribee Council • Goulburn Mulwaree Council • Upper Lachlan Shire Council • Yass Valley Council • Hilltops Council • Cowra Council • Blayney Shire Council 	Compliant
Road Upgrades				
F15A	Unless otherwise agreed by the Planning Secretary , the Proponent must: (a) prior to the commencement of construction, in consultation with the relevant roads authority, prepare a report with specific details of the public road works required to facilitate the safe access of construction vehicles to the site (including any over-size and/or over-mass general construction vehicles), excluding any wider works required to facilitate delivery of the over-size and over-mass wind turbine components. The report must also detail public road works and traffic management that must be undertaken during the construction phase as part of the ongoing construction works (as agreed with the relevant roads authority). Where improvements or changes to the proposed route are required as	- Construction Traffic and Access Management Plan (CTAMP), Flyers Creek Wind Farm Project (Rev. G, 19/08/21), prepared by Nacap. - DPE approval letter of CTAMP (Rev. G, 19/08/21) dated 17/09/20	Requirements of this condition are discussed further within the Construction Traffic and Access Management Plan (Condition F21(c)). The Planning Secretary's approval letter of the CTAMP acknowledges that the CTAMP addresses the requirements of this condition.	Compliant

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	<p>identified in the report as having to be completed prior to the commencement of construction, the Proponent must implement these to the satisfaction of the relevant roads authority, prior to the commencement of construction and at the full expense of the Proponent; and</p> <p>(b) prior to the commencement of any over-mass or over-dimensional vehicles accessing the site specifically for the delivery of wind turbine components, in consultation with the relevant roads authority, submit a report to the Department detailing specific public road works that must be completed prior to the delivery of the wind turbine components. Where improvements are required, the Proponent must implement these to the satisfaction of the relevant roads authority, prior to the delivery of the wind turbine components to site and at the full expense of the Proponent.</p> <p>If there is a dispute about the road upgrades to be implemented, or the implementation of these upgrades, then either the Proponent or the relevant roads authority, may refer the matter to the Planning Secretary for resolution.</p>	<p>- Email correspondence from the BSC General Manager to the Auditor dated 20/02/26 with the following comment:</p> <ul style="list-style-type: none"> Intersection of Errowanbang Road and Mid Western Highway not being upgraded as required by Transport for NSW through the Project Approval and as indicated to Council and the community that it would be. <p>- Letter from TfNSW, dated 23/06/25, agreeing with DPHI's decision to remove the requirement to upgrade a treatment for the Errowanbang Road and Mid Western Highway intersection.</p>	<p>Concerns were raised with the Auditor from the BSC General Manager regarding a road upgrade that did not occur at Errowanbang Road and Mid Western Hwy. The Auditor sighted evidence from TfNSW where they agreed with DPHI's decision to remove the requirement to upgrade a road treatment at the intersection.</p> <p>The Auditor suggests that the proponent liaise with BSC regarding this matter and have included it with an Opportunity for Improvement in Condition F17.</p>	
Road Dilapidation Report				
F16	<p>Prior to the commencement of construction, the Proponent shall undertake a Road Dilapidation Report of sealed roads on the haulage route(s) within the Blayney Local Government Area. 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 must be undertaken using a method agreed to by the relevant roads authority and submitted to the relevant road authority for review prior to the commencement of haulage.</p>	<p>- Road Condition Report – Preconstruction (Ver. 1), dated 0/12/21, prepared by Australian Road Research Board (ARRB)</p> <p>- Letter to DPE dated 11/01/22 providing evidence of compliance with this condition</p> <p>- DPIE receipt dated 21/01/22</p>	<p>ARRB undertook a road dilapidation survey in accordance with this condition prior to the commencement of construction.</p> <p>The method used for the dilapidation survey was agreed to by Blayney Shire Council, which is the relevant roads authority. In addition, the report was submitted to Blayney Shire Council for review and also provided to Transport for NSW for information.</p>	Compliant
Road Repair				
F17	<p>The Proponent shall repair all damage to sealed roads during construction. 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. Within three months of completion of construction:</p> <p>(a) the Proponent shall undertake gravel re-sheeting to a minimum depth of 100 mm on all gravel roads used for access during construction. Works shall be completed in accordance with Roads and Maritime Services Specification M220; and</p> <p>(b) a Report shall be prepared to assess any damage to sealed roads that may have resulted from the construction of the Project (including mechanisms to restore any damage) and submitted to the relevant road authority for review.</p>	<p>- Audit site visit observations</p> <p>- Blayney Shire Council (BSC) email correspondence dated 13/02/25, 10/11/25</p> <p>- FCWF Dilapidation Report Post-Construction, dated 17/04/25, prepared by NTRO</p> <p>- Proponents internal memo discussing public road dilapidation (Conditions F16 and F17), dated 04/08/25</p> <p>- Letter from BSC Director of Infrastructure Services dated 07/04/26</p> <p>- Email correspondence from the BSC General Manager to the Auditor dated 20/02/26 with the following comments:</p> <ul style="list-style-type: none"> Condition F17 required works to be completed within 3 months of completion of construction. 	<p>Evidence of road repair witnessed during audit site visit.</p> <p>BSC correspondence dated 13/02/25 confirmed that gravel re-sheeting to a minimum depth of 100mm had been undertaken on gravel roads used for access during construction, in accordance with Condition F17(a). It was also noted that repairs to all sealed roads during construction, and a report assessing damage (in accordance to Condition F17(b)) was still outstanding.</p> <p>A post-construction dilapidation survey was undertaken by NTRO on 17/03/25 and the report was issued to BSC on 05/05/25. BSC correspondence dated 10/11/25 noted that BSC accepted the NTRO report and that the agreed repair works remained outstanding.</p> <p>The requirements of Condition F17(a) and (b) were completed within three months of the completion of construction.</p>	Compliant

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		<ul style="list-style-type: none"> ○ Council and the community expectations here was within 3 months of the towers being completed and commissioned. ○ The works associated with condition F17 were completed more than 3 months after completion of construction. 	<p>A letter was received from BSC Director of Infrastructure Services on 07/04/26 stating that Council was satisfied with the completed repairs and hereby confirmed release of Condition F17.</p> <p>Concerns were raised with the Auditor from the BSC General Manager regarding works to be completed within 3 months of completion of construction. The Auditor notes that the items described in Condition F17 (a) and (b) were completed within 3 months of completion of construction. Condition F17 requires road works to be completed with the reasonable requirements of BSC, including timing, but does not specify within 3 months of completion of construction. The Auditor further notes that the proponent provided evidence of negotiation between the proponent and Blayney Shire Council regarding road repairs, including face-to-face meetings, fortnightly meetings, emails and site inspections.</p> <p>Opportunity for Improvement No. 1 (IEA2): Liaise with Blayney Shire Council, including the General Manager, to confirm if there are any outstanding road repair items. In addition, please discuss Council’s concerns regarding the removal of the road upgrade treatment for the Errowanbang Road and Mid Western Highway intersection. If any road repair items are still outstanding, they should be expedited as a priority.</p>	
ANCILLARY FACILITIES				
F18	<p>Unless otherwise approved by the Planning Secretary, the location of Ancillary Facilities shall:</p> <ul style="list-style-type: none"> (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; (e) be sited on relatively level land; (f) be separated from nearest residences by at least 200 metres; (g) not require vegetation clearing beyond that already required by the Project; (h) not impact on heritage sites (including areas of archaeological sensitivity) beyond those already impacted by the Project; (i) not unreasonably affect the land use of adjacent properties; (j) be above the 20 ARI flood level unless a contingency plan to manage flooding is prepared and implemented; and (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>The location of the Ancillary Facilities shall be identified in the Construction Environmental Management Plan required under condition F20 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 Planning Secretary that there will</p>	<ul style="list-style-type: none"> - Construction Traffic and Access Management Plan (CTAMP), Flyers Creek Wind Farm Project (Rev. G, 19/08/21), prepared by Nacap. - DPE approval letter of CTAMP (Rev. G, 19/08/21) dated 17/09/20 	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CTAMP was developed to address relevant conditions and approved by DPHI. Site works were completed in general accordance with the requirements of this plan. The location of the Ancillary Facilities is provided within the approved CTAMP.</p>	Compliant

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	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.			
F19	All construction ancillary facility sites shall be rehabilitated to at least their pre-construction condition, unless otherwise agreed by the affected landowner.	<p>- Site inspection documents and photo records between July and December 2025 showed evidence of rehabilitation of the following:</p> <ul style="list-style-type: none"> • Concrete Batching plant – progressive pasture revegetation improvement • Track 11 Access Road Entry - progressive batter revegetation improvement • GE Laydown Area - progressive rehabilitation improvements in GE Laydown Area • Main Site Compound - progressive pasture revegetation • Cable corridor below sub-station – progressive rehabilitation • MV U/G Cable Corridor below sub-station – progressive rehabilitation and stabilised with groundcover, no slope scouring evident <p>- Audit site observations</p> 	<p>Based on review of site inspection records, photos and the audit site visit it is considered that appropriate rehabilitation of construction ancillary facility sites has occurred.</p> <p>Construction areas were very well rehabilitated with good vegetation cover and extensive re-profiling to blend with surrounding landscapes.</p>	Compliant
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
F20	Prior to the commencement of construction, or as otherwise agreed by the Planning Secretary , the Proponent shall prepare and implement (following approval) a Construction Environmental Management Plan for the Project. The Plan shall outline the environmental management practices and procedures that are to be followed during construction, and shall be prepared in consultation with the relevant government agencies (including the Councils). The Plan shall include, but not necessarily be limited to:	<p>- Construction Environmental Management Plan (CEMP), Flyers Creek Wind Farm (Rev. F, 21/08/20), prepared by Nacap.</p> <p>- DPE approval letter of CEMP (Rev. F, 21/08/20) dated 04/09/20</p>	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CEMP was approved by DPE and the Auditor understands that the project was constructed in general</p>	Compliant

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	<p>(a) a description of activities to be undertaken during construction of the Project (including staging and scheduling);</p> <p>(b) statutory and other obligations that the Proponent is required to fulfil during construction, including approvals / consents, consultations and agreements required from authorities and other stakeholders under key legislation and policies;</p> <p>(c) a description of the roles and responsibilities for relevant employees involved in the construction of the Project, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors are aware of their environmental and compliance obligations under these Conditions of Approval;</p> <p>(d) an environmental risk analysis to identify the key environmental performance issues associated with the construction phase; and</p> <p>(e) 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 any impacts arising from the staging of the construction of the Project). In particular, the following environmental performance issues shall be addressed in the Plan:</p> <ol style="list-style-type: none"> i. compounds and ancillary facilities management; ii. noise and vibration; iii. traffic and access; iv. soil and water quality and spoil management; v. air quality and dust management; vi. management of Aboriginal and non-Aboriginal heritage; vii. soil contamination, hazardous material and waste management; viii. management of ecological impacts; and ix. hazard and risk management. <p>The Plan shall be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of construction, or as otherwise agreed by the Planning Secretary. The Plan may be prepared in stages, however, construction works for each stage shall not commence until written approval has been received from the Planning Secretary.</p> <p>The approval of a Construction Environmental Management Plan does not relieve the Proponent of any requirement associated with this Approval. If there is an inconsistency with an approved Construction Environmental Management Plan and the conditions of this Approval, the requirements of this Approval prevail.</p>	<p>- Jacobs Weekly Environmental Inspection photos (dated between 05/06/23 and 06/11/23)</p> <p>- Green Light Contractors (GLC) daily environmental inspections (dated between 10/10/23 and 20/11/23)</p> <p>- Green Light Contractors (GLC) weekly environmental inspections (dated between 26/06/23 and 16/11/23)</p> <p>- Compliance Check – FCWF CEMP, dated 17/08/23, prepared by Jacobs</p>	<p>accordance with this plan during the Construction Phase of the project.</p> <p>Daily and weekly environmental inspection checklists were sighted by the Auditor that showed routine monitoring was conducted during the construction phase to assess environmental performance.</p> <p>An internal compliance check of relevant sub-sections of the the CEMP was completed by Jacobs, on behalf of Iberdrola, following a non-compliance identified in the first Independent Environmental Audit.</p> <p>The compliance check involved:</p> <ul style="list-style-type: none"> • A site inspection on 16/08/23 with the Principal Contactor • Snapshot of key management measures including: <ul style="list-style-type: none"> ○ Training and Awareness ○ Reporting and Record Keeping ○ Environmental Aspects and Impacts Register ○ Community and Stakeholders Communication Protocol ○ Environmental Inspection Reporting ○ Waste Management Protocol <p>The Auditor considers this compliance check to be a good initiative for the construction phase of the project.</p>	
F21	As part of the Construction Environmental Management Plan for the Project required under condition F20 the Proponent shall prepare and implement:	N/A	N/A	N/A
F21 (a)	<p>a Construction Compound and Ancillary Facilities Management Plan to detail the management of construction ancillary facilities associated with the Project. The Plan shall include but not be limited to:</p> <ol style="list-style-type: none"> i. a description of the facility, its components and the surrounding environment; ii. details of the activities to be carried out at each facility, including the hours of use and the storage of dangerous and hazardous goods; iii. an assessment against the locational criteria outlined in condition F18; iv. details of the mitigation and management procedures specific to the facility that would be implemented to minimise environmental and amenity impacts, and an assessment of the adequacy of the mitigation or offsetting measures; 	<p>- Construction Compound and Ancillary Facilities Management Plan (CCAFMP), Flyers Creek Wind Farm (Rev. F, 29/10/21), prepared by Nacap.</p> <p>- DPE approval letter of CCAFMP (Rev. F, 29/10/21) dated 05/11/21</p> <p>- Jacobs Weekly Environmental Inspection photos (dated between 05/06/23 and 06/22/23)</p>	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CCAFMP was approved by DPE and the Auditor understands that the ancillary sites were constructed and operated in general accordance with this plan during the Construction Phase of the project.</p> <p>Daily and weekly environmental inspection checklists were sighted by the Auditor that showed routine monitoring was</p>	Compliant

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	v. identification of the timing for the completion of activities at the facility and how the site will be decommissioned (including any necessary rehabilitation); and vi. mechanisms for the monitoring, review and amendment of this Plan.	- Green Light Contractors (GLC) daily environmental inspections (dated between 10/10/23 and 20/11/23) - Green Light Contractors (GLC) weekly environmental inspections (dated between 26/06/23 and 16/11/23)	conducted during the construction phase to assess environmental performance. As discussed in Condition F19, photos supplied by Iberdrola between July and December 2025 showed successful rehabilitation of construction ancillary facility sites.	
F21 (b)	a Construction Noise and Vibration Management Plan to detail how construction noise and vibration impacts will be minimised and managed. The Plan shall be consistent with the guidelines contained in the <i>Interim Construction Noise Guidelines</i> (DECC, 2009) and shall include, but not be limited to: i. identification of sensitive receivers and relevant construction noise and vibration goals applicable to the Project stipulated in this approval; ii. details of construction activities and an indicative schedule for construction works, including the identification of key noise and / or vibration generating construction activities (based on representative construction scenarios, including at ancillary facilities) that have the potential to generate noise and / or vibration impacts on surrounding sensitive receivers; iii. identification of feasible and reasonable measures proposed to be implemented to minimise and manage construction noise and vibration impacts (including construction traffic noise impacts); iv. procedures and mitigation measures to ensure relevant vibration and blasting criteria are achieved, including a suitable blast program, applicable buffer distances for vibration intensive works, use of low-vibration generating equipment / vibration dampeners or alternative construction methodology, and pre- and post- construction dilapidation surveys of sensitive structures where blasting and / or vibration is likely to result in damage to buildings and structures (including surveys being undertaken immediately following a monitored exceedance of the criteria); v. a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be conducted, the locations where monitoring would take place, how the results of this monitoring would be recorded and reported, and, if any exceedance is detected, how any non-compliance would be rectified; and vi. mechanisms for the monitoring, review and amendment of this Plan.	- Construction Noise and Vibration Management Plan (CNVMP), Flyers Creek Wind Farm Project (Rev. D, 11/05/20), prepared by Nacap. - DPE approval letter of CNVMP (Rev. D, 11/05/20) dated 14/05/20 - Compliance Check – FCWF CNVMP, dated 17/08/23, prepared by Jacobs (including noise and vibration monitoring reports)	Construction phase condition only. The project has been operational since July 2025. The CNVMP was approved by DPE and the Auditor understands that the project was constructed in general accordance with this plan during the Construction Phase of the project. An internal compliance check of relevant sub-sections of the the CNVMP was completed by Jacobs, on behalf of Iberdrola, following a non-compliance identified in the first Independent Environmental Audit. The compliance check involved: <ul style="list-style-type: none"> • A site inspection on 15/08/23 with the Principal Contactor • Snapshot of key management measures including: <ul style="list-style-type: none"> ○ Complaints Management System (including construction and OOHW noise complaints) ○ Noise monitoring protocol, including reporting ○ Vibration monitoring protocol, including reporting The Auditor considers this compliance check to be a good initiative for the construction phase of the project.	Compliant
F21 (c)	a Construction Traffic and Access Management Plan to manage construction traffic and access impacts of the Project. The Plan shall be developed in consultation with the relevant road authority and shall include, but not necessarily be limited to: i. identification of construction traffic routes and construction traffic volumes (including heavy vehicle / spoil haulage / material haulage) on these routes; ii. details of vehicle movements for construction sites and site compounds including parking, dedicated vehicle turning areas, and ingress and egress points; iii. identification of construction impacts that could result in disruption of traffic, public transport (inclusive of school buses), pedestrian and cycle access, property access, including details of oversize load movements; iv. details of management measures to minimise traffic impacts, including temporary road work traffic control measures, onsite vehicle queuing and parking areas and management measures to minimise peak time congestion (including on school buses), and measures to ensure safe pedestrian and cycle access;	- Construction Traffic and Access Management Plan (CTAMP), Flyers Creek Wind Farm Project (Rev. G, 19/08/21), prepared by Nacap. - DPE approval letter of CTAMP (Rev. G, 19/08/21) dated 17/09/20 - Jacobs Weekly Environmental Inspection photos (dated between 05/06/23 and 06/22/23) - Green Light Contractors (GLC) daily environmental inspections (dated between 10/10/23 and 20/11/23)	Construction phase condition only. The project has been operational since July 2025. The CTAMP was approved by DPE and the Auditor understands that the project was constructed in general accordance with this plan during the Construction Phase of the project. Daily and weekly environmental inspection checklists were sighted by the Auditor that showed routine monitoring was conducted during the construction phase to assess environmental performance.	Compliant

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	v. a response plan which sets out a proposed response to any traffic, construction or other incident; and vi. mechanisms for the monitoring, review and amendment of this Plan.	- Green Light Contractors (GLC) weekly environmental inspections (dated between 26/06/23 and 16/11/23) - Jacobs weekly inspection photos related to traffic dated 14/08/23, 13/10/23 and 30/10/23		
F21 (d)	a Construction Soil and Water Quality Management Plan to manage surface and groundwater impacts during construction of the Project. The plan shall be developed in consultation with Dol – L&W and Blayney Shire Council and include, but not necessarily be limited to: i. details of construction activities and their locations, which have the potential to impact on water courses, storage facilities, stormwater flows, and groundwater; ii. surface water and ground water impact assessment criteria consistent with <i>Australian and New Zealand Environment Conservation Council (ANZECC) guidelines</i> ; iii. management measures to be used to minimise surface and groundwater impacts, including details of how spoil and fill material required by the Project will be sourced, handled, stockpiled, reused and managed, erosion and sediment control measures, and the consideration of flood events; iv. management measures for contaminated material and a contingency plan to be implemented in the case of unanticipated discovery of contaminated material during construction; v. a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, how the results of the monitoring would be recorded and reported, and, if any exceedance of the criteria is detected how any non-compliance can be rectified; and vi. mechanisms for the monitoring, review and amendment of this Plan.	- Construction Soil and Water Quality Management Plan (CSWQMP), Flyers Creek Wind Farm Project (Rev. E, 25/06/20), prepared by Nacap. - DPE approval letter of CSWQMP (Rev. E, 25/06/20) dated 03/07/20 - Jacobs Weekly Environmental Inspection photos (dated between 05/06/23 and 06/22/23) - Green Light Contractors (GLC) daily environmental inspections (dated between 10/10/23 and 20/11/23) - Green Light Contractors (GLC) weekly environmental inspections (dated between 26/06/23 and 16/11/23) - Compliance Check – FCWF CSWQMP, dated 17/08/23, prepared by Jacobs	Construction phase condition only. The project has been operational since July 2025. The CSWQMP was approved by DPE and the Auditor understands that the project was constructed in general accordance with this plan during the Construction Phase of the project. Daily and weekly environmental inspection checklists were sighted by the Auditor that showed routine monitoring was conducted during the construction phase to assess environmental performance. An internal compliance check of relevant sub-sections of the the CNVMP was completed by Jacobs, on behalf of Iberdrola, following a non-compliance identified in the first Independent Environmental Audit. The compliance check involved: <ul style="list-style-type: none"> • A site inspection on 16/08/23 with the Principal Contactor • Snapshot of key management measures including: <ul style="list-style-type: none"> ○ ESC planning and implementation, including after rainfall events, and visual monitoring ○ Erosion controls to divert clean water ○ Assessment of daily and weekly inspections The Auditor considers this compliance check to be a good initiative for the construction phase of the project.	Compliant
F21 (e)	a Construction Heritage Management Plan to detail how construction impacts on Aboriginal and Historic heritage will be minimised and managed. The Plan shall be developed in consultation with the Heritage NSW and registered Aboriginal stakeholders (for Aboriginal heritage), and include, but not necessarily be limited to: i. in relation to Aboriginal Heritage: <ul style="list-style-type: none"> ▪ details of further investigation and identification of Aboriginal cultural heritage sites within the Project area; ▪ details of management measures to be carried out in relation to Aboriginal heritage, including a detailed methodology and strategies for protection, monitoring, and conservation, of sites and items associated with the Project; ▪ procedures for dealing with previously unidentified Aboriginal objects (excluding human remains) including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate 	- Construction Heritage Management Plan (CHMP), Flyers Creek Wind Farm Project (Rev. F, 10/06/20), prepared by Nacap. - DPE approval letter of CHMP (Rev. F, 10/06/20) dated 18/06/20 - Jacobs Weekly Environmental Inspection photos (dated between 05/06/23 and 06/22/23) - Green Light Contractors (GLC) daily environmental inspections (dated between 10/10/23 and 20/11/23)	Construction phase condition only. The project has been operational since July 2025. The CHMP was approved by DPE and the Auditor understands that the project was constructed in general accordance with this plan during the Construction Phase of the project. Daily and weekly environmental inspection checklists were sighted by the Auditor that showed routine monitoring was conducted during the construction phase to assess environmental performance.	Compliant

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	<p>mitigation measures including when works can re-commence by a suitably qualified archaeologist in consultation with the Department, Heritage NSW and registered Aboriginal stakeholders, and assessment of the consistency of any new Aboriginal heritage impacts against the approved impacts of the Project, and registering of the new site in the Heritage NSW's Aboriginal Heritage Information Management System (AHIMS) register;</p> <ul style="list-style-type: none"> ▪ procedures for dealing with human remains, including cessation of works in the vicinity and notification of the Department, NSW Police Force, Heritage NSW and registered Aboriginal stakeholders and not recommencing any works in the area unless authorised by the Department and / or the NSW Police Force; ▪ heritage training and induction processes for construction personnel (including procedures for keeping records of inductions) and obligations under the conditions of this Approval and <i>National Parks and Wildlife Act 1974</i> (where relevant) including site identification, protection and conservation of Aboriginal cultural heritage; ▪ procedures for ongoing Aboriginal consultation and involvement for the duration of the Project, and ensure that the Orange Local Aboriginal Land Council (administrator) and Wiradjuri Traditional Owners Central West Corporation is kept informed of the process; and ▪ mechanisms for the monitoring, review and amendment of this plan. <p>ii. in relation to Historic Heritage:</p> <ul style="list-style-type: none"> ▪ identification of heritage items directly and indirectly affected by the Project; ▪ details of management measures to be implemented to prevent and minimise impacts on heritage items (including further heritage investigations, archival recordings and / or measures to protect unaffected sites during construction works in the vicinity); ▪ procedures for dealing with previously unidentified heritage objects (including cessation of works in the vicinity), assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can recommence by a suitably qualified and experienced archaeologist in consultation with the Heritage NSW and the Department, and assessment of the consistency of any new heritage impacts against the approved impacts of the Project; ▪ heritage training and induction processes for construction personnel (including procedures for keeping records of inductions and obligations under the <i>Heritage Act 1977</i> and these conditions) including site identification, protection and conservation of non-Aboriginal cultural heritage; and ▪ mechanisms for the monitoring, review and amendment of this plan. 	<p>- Green Light Contractors (GLC) weekly environmental inspections (dated between 26/06/23 and 16/11/23)</p>		
F21 (f)	<p>a Construction Flora and Fauna Management Plan to detail how construction impacts on ecology will be minimised and managed. The Plan shall be developed in consultation with the BCS and shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> i. plans and tables for impacted and adjoining areas showing vegetation communities (identified to Plant Community Type); watercourses; remnant vegetation (including scattered trees); important flora and fauna habitat areas; locations where threatened species, populations or ecological communities have been recorded; including pre-clearing surveys to confirm the location, description of condition, status, numbers, area (hectares) of threatened flora and fauna species and associated habitat features; 	<p>- Construction Flora and Fauna Management Plan (CFFMP), Flyers Creek Wind Farm Project (Rev. F, 16/12/21), prepared by Nacap.</p> <p>- DPE approval letter of CFFMP (Rev. F, 16/12/21) dated 17/02/22</p> <p>- Jacobs Weekly Environmental Inspection photos (dated between 05/06/23 and 06/22/23)</p>	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CFFMP was approved by DPE and the Auditor understands that the project was constructed in general accordance with this plan during the Construction Phase of the project.</p>	Compliant

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	<p>ii. procedures for minimising the extent of vegetation clearing and replacement of any fauna habitat;</p> <p>iii. the identification of areas to be cleared and details of management measures (such as fencing, clearing procedures, removal and relocation of fauna during clearing, habitat tree management and construction worker education) to avoid any residual habitat damage or loss and to minimise or eliminate time lags between the removal and subsequent replacement of habitat;</p> <p>iv. rehabilitation details, including identification of flora species and sources, and measures for the management and maintenance of rehabilitated areas;</p> <p>v. weed management measures focusing on early identification of invasive weeds and effective management controls;</p> <p>vi. a description of how the effectiveness of these actions and measures would be monitored, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, how the results of the monitoring would be recorded and reported and, if any exceedance of the criteria is detected, how any non-compliance can be rectified;</p> <p>vii. a procedure for dealing with unexpected EEC / threatened species identified during construction, including cessation of work and notification of the BCS and the Department, determination of appropriate mitigation measures in consultation with the BCS (including relevant re-location measures) and updating of ecological monitoring and / or biodiversity offset requirements; and</p> <p>viii. mechanism for the monitoring, review and amendment of this Plan.</p>	<p>- Green Light Contractors (GLC) daily environmental inspections (dated between 10/10/23 and 20/11/23)</p> <p>- Green Light Contractors (GLC) weekly environmental inspections (dated between 26/06/23 and 16/11/23)</p> <p>- Compliance Check – FCWF CCFMP, dated 17/08/23, prepared by Jacobs</p>	<p>Daily and weekly environmental inspection checklists were sighted by the Auditor that showed routine monitoring was conducted during the construction phase to assess environmental performance.</p> <p>An internal compliance check of relevant sub-sections of the CFFMP was completed by Jacobs, on behalf of Iberdrola, following a non-compliance identified in the first Independent Environmental Audit.</p> <p>The compliance check involved:</p> <ul style="list-style-type: none"> • A site inspection on 15/08/23 with the Principal Contactor • Snapshot of key management measures including: <ul style="list-style-type: none"> ○ Site disturbance boundaries ○ Tree felling protocol ○ Minimisation of clearing of vegetation ○ Recording of vegetation on Disturbance Record Sheet <p>The Auditor considers this compliance check to be a good initiative for the construction phase of the project.</p>	
F21 (g)	<p>a Construction Air Quality Management Plan to detail how construction impacts on air quality will be minimised and managed. The Plan shall include, but not necessarily be limited to:</p> <p>i. the identification of potential sources of dust;</p> <p>ii. dust management objectives;</p> <p>iii. mitigation measures to be implemented, including measures during weather conditions where high dust level episodes are probable (such as strong winds in dry weather);</p> <p>iv. a monitoring program to assess compliance with the identified objectives; and</p> <p>v. mechanisms for the monitoring, review and amendment of this Plan.</p>	<p>- Construction Air Quality Management Plan (CAQMP), Flyers Creek Wind Farm Project (Rev. D, 05/05/20), prepared by Nacap.</p> <p>- DPE approval letter of CAQMP (Rev. D, 05/05/20) dated 08/05/20</p> <p>- Jacobs Weekly Environmental Inspection photos (dated between 05/06/23 and 06/22/23)</p> <p>- Green Light Contractors (GLC) daily environmental inspections (dated between 10/10/23 and 20/11/23)</p> <p>- Green Light Contractors (GLC) weekly environmental inspections (dated between 26/06/23 and 16/11/23)</p>	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The CAQMP was approved by DPE and the Auditor understands that the project was constructed in general accordance with this plan during the Construction Phase of the project.</p> <p>Daily and weekly environmental inspection checklists were sighted by the Auditor that showed routine monitoring was conducted during the construction phase to assess environmental performance.</p>	Compliant
F21 (h)	<p>a Bushfire Management Plan to detail measures to prevent fires during the construction phase. This Plan shall be developed in consultation with the Forestry Corporation NSW and shall include:</p> <p>i. work involving risk of ignition that should not be carried out during a total fire ban;</p> <p>ii. availability of fire suppression equipment;</p> <p>iii. storage and maintenance of fuels and other flammable materials; and</p>	<p>- Bushfire Management Plan (BMP), Flyers Creek Wind Farm Project (Rev. E, 15/06/20), prepared by Nacap.</p> <p>- DPE approval letter of BMP (Rev. E, 15/06/20) dated 18/06/20</p>	<p>Construction phase condition only. The project has been operational since July 2025.</p> <p>The BMP was approved by DPE and the Auditor understands that the project was constructed in general accordance with this plan during the Construction Phase of the project.</p>	Compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	iv. notification of the Canobolas Zone Rural Fire Service Fire Control Centre for works proposed to be carried out during high fire danger periods to ensure weather conditions are appropriate.			
SCHEDULE G – OPERATION ENVIRONMENTAL MANAGEMENT				
HAZARD AND RISK				
Bushfire Risk				
G1	Throughout the operational life of the Project, the Proponent shall regularly consult with the Canobolas Zone Rural Fire Service to ensure its familiarity with the Project. The Proponent shall comply with any reasonable request of the Canobolas Zone Rural Fire Service to reduce the risk of bushfire and to enable fast access in emergencies.	<ul style="list-style-type: none"> - Correspondence from Iberdrola to Canobolas Zone RFS dated 25/08/25 discussing process for turbines and power lines to be switched off in a fire and contact details - Correspondence between FCWF and Canobolas Zone RFS organising a meeting in October 2025 - Presentation given to Canobolas Zone RFS on 17/11/25 including attendance register. - Presentation given to: <ul style="list-style-type: none"> • Blayney Shire Council • Orange and Cabonne Councils 	<p>Regular consultation with the Canobolas Zone RFS has occurred during operation of the project.</p> <p>A detailed presentation was provided to the Canobolas Zone RFS on 17/11/25 which included a discussion of fire management. In addition, this presentation was provided to Blayney, Orange and Cabonne Councils.</p>	Compliant
Safety Management System				
G2	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 <i>Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'</i> , and should include: <ul style="list-style-type: none"> (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 (b) an outline of a documented procedure for the management of change. 	<ul style="list-style-type: none"> - Internal Memo – FCWF Safety Management System Review dated 31/10/24 - Work Health and Safety Management Plan, FCWF, Version 2.1, dated 02/05/25, prepared by Iberdrola (former version is Version 2.0, dated 30/08/24) - DPHI acknowledgement of receipt of Safety Management System Review dated 24/06/25 - Preventive maintenance checklists viewed for various dates: 13/10/25, 14/01/26, 18/02/26. All relevant information presented. - Detailed maintenance records held for key site plant, equipment and infrastructure inc. lighting, transmission lines (thermography testing), vegetation and bushfire clearance, residual current devices, workshop equipment, fire-fighting equipment, substation, turbines, etc. 	<p>An internal memo was produced in October 2024, at least 2 months prior to commissioning, to satisfy the requirements of this condition. The memo checked the compliance of the requirements of the <i>Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'</i> and the requirements of this condition, with the existing FCWF Work Health and Safety Management Plan (Version 2.0, dated 30/08/24)</p> <p>Completed register/inspections/maintenance records held on site. Relevant information presented within the registers. Information was current to date of audit site visit.</p>	Compliant
Television, Radio and Telephone/Internet Interference				

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
G3	<p>Prior to the commencement of commissioning of the Project, the Proponent shall undertake an assessment of the existing quality of the television, radio and telephone/internet transmission available at a representative sample of receivers located within five kilometres of any wind turbine.</p>	<p>- Base-Line Coverage Analysis for Radiocommunications Services in proximity to Flyers Creek Wind Farm, prepared by SAT Pty Ltd, Version 1.0, dated 22/08/24</p> <p>- Base-Line Coverage Analysis for Radiocommunications Services in proximity to Flyers Creek Wind Farm, prepared by SAT Pty Ltd, Version 2.0, dated 24/10/24</p>	<p>A base-line coverage report was undertaken in August 2024, prior to commissioning the project.</p> <p>The first report (Version 1.0, dated 22/08/24) suggested that, using predictive analysis, there was the potential that the WTG's would introduce a level of interference.</p> <p>The second report (Version 2.0, dated 24/10/24) included a field measurement survey, and concluded that there was likely to be degradation of service quality of a range of radiocommunications services.</p>	Compliant
G4	<p>In the event of a complaint from a receptor located within five kilometres of a wind turbine regarding television / radio / telephone / internet 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 as soon as possible and 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>	<p>- Iberdrola Internal Memo dated 17/03/26 provided details regarding degraded TV free to air reception in Carcoar and actions made to resolve the degradation. Actions include:</p> <ul style="list-style-type: none"> • Short term solution: Installation of Viewer Access Satellite TV to consenting residents who had lodged complaints • Long term solution: Construction of a new TV-rebroadcast tower to improve free to air reception in the area <p>- Flyer dated September 2024 acknowledging possible interference with TV signal in the community and how to register a complaint (phone number, email, leaving details at Carcoar Post Office)</p> <p>- Letter dated 03/09/24 to local residents with information similar to flyer above</p> <p>- Example of individual letter (dated 10/09/24) acknowledging receipt of complaint</p>	<p>The proponent acknowledged that there had been a degradation in TV free to air reception in Carcoar, which is located approximately 5km from the project.</p> <p>The auditor was provided with an update (internal memo received 13/03/26) which provided the following information:</p> <ul style="list-style-type: none"> • First complaint re: degraded TV reception was received on 13/03/24 • Iberdrola engaged a contractor to investigate complaint and arrange for an antenna booster system to be installed at Iberdrola's expense • Iberdrola completed a wider study in June 2024 including community door knock in Carcoar Village, issue of community notice flyer and letters issued to known and unknown recipients and received 91 complaints about degraded TV reception • Residents were offered a VAST system, which included a roof mounted satellite dish and set top box, or compensation • As of 13/03/26, of the 91 complaints: <ul style="list-style-type: none"> ○ Only 1 resident was awaiting their VAST set-top box due to paused works due to intending to replace their roof ○ 57 residents had VAST systems installed ○ 20 residents received compensation in lieu of VAST ○ 13 residents did not want VAST or compensation • Construction of the new TV-rebroadcast tower is expected to be commissioned by 03/11/26 and fully rectify terrestrial TV signal. A Development Application was approved by Blayney Shire Council on 11/11/25 and procurement is underway with an estimated contract award date during March 2026. <p>The Auditor considers the proponent has met their obligations as required by this condition.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																																																																																															
REHABILITATION AND REVEGETATION																																																																																																			
G5	Deleted.	N/A	N/A	N/A																																																																																															
G6	Deleted	N/A	N/A	N/A																																																																																															
NOISE																																																																																																			
Operational Noise Criteria – Wind Turbines																																																																																																			
G7	<p>The Proponent must ensure that the noise generated by the operation of wind turbines does not exceed the relevant criteria in Table 3 at any non-associated residence.</p> <p><i>Table 3: Noise criteria dB(A)</i></p> <table border="1"> <thead> <tr> <th rowspan="2">Residence</th> <th colspan="11">Criteria (dB(A)) Referenced to Hub Height (85m AGL) Wind Speed (m/s)</th> </tr> <tr> <th>3 or less</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> <th>10</th> <th>11</th> <th>12</th> <th>13</th> </tr> </thead> <tbody> <tr> <td>R010, R011, R012, R013, R014, R046, R048, R057, R071, R072, R074, R095, R102</td> <td>35</td> <td>35</td> <td>36</td> <td>37</td> <td>38</td> <td>39</td> <td>40</td> <td>41</td> <td>42</td> <td>43</td> <td>44</td> </tr> <tr> <td>R023, R024, R025, R043, R055, R090, R108</td> <td>35</td> <td>35</td> <td>35</td> <td>35</td> <td>36</td> <td>37</td> <td>38</td> <td>39</td> <td>40</td> <td>40</td> <td>41</td> </tr> <tr> <td>R027, R044</td> <td>35</td> <td>35</td> <td>35</td> <td>35</td> <td>35</td> <td>36</td> <td>38</td> <td>39</td> <td>40</td> <td>41</td> <td>42</td> </tr> <tr> <td>R056, R077, R078, R099</td> <td>35</td> <td>35</td> <td>35</td> <td>35</td> <td>35</td> <td>35</td> <td>36</td> <td>37</td> <td>38</td> <td>40</td> <td>41</td> </tr> <tr> <td>R089</td> <td>35</td> <td>35</td> <td>35</td> <td>35</td> <td>37</td> <td>39</td> <td>40</td> <td>42</td> <td>43</td> <td>43</td> <td>43</td> </tr> <tr> <td>All other residences not associated with the project and wind speeds > 12m/s</td> <td colspan="11">The higher of 35 dB(A) or the existing background noise level plus 5 dB(A)</td> </tr> </tbody> </table> <p><i>Note: To identify the residences referred to in Table 3, see the applicable figure in Appendix 2.</i></p> <p>Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the Department’s <i>Wind Energy: Noise Assessment Bulletin (2016)</i> (or its latest version) and the provisions in Appendix 2. If this guideline is replaced by an equivalent NSW guideline, then the noise generated is to be measured in accordance with the requirements in the NSW guideline.</p> <p>However, these criteria do not apply if the Proponent has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p>	Residence	Criteria (dB(A)) Referenced to Hub Height (85m AGL) Wind Speed (m/s)											3 or less	4	5	6	7	8	9	10	11	12	13	R010, R011, R012, R013, R014, R046, R048, R057, R071, R072, R074, R095, R102	35	35	36	37	38	39	40	41	42	43	44	R023, R024, R025, R043, R055, R090, R108	35	35	35	35	36	37	38	39	40	40	41	R027, R044	35	35	35	35	35	36	38	39	40	41	42	R056, R077, R078, R099	35	35	35	35	35	35	36	37	38	40	41	R089	35	35	35	35	37	39	40	42	43	43	43	All other residences not associated with the project and wind speeds > 12m/s	The higher of 35 dB(A) or the existing background noise level plus 5 dB(A)											<ul style="list-style-type: none"> - FCWF Permit Noise Compliance Testing, prepared by sonus (S870.2C2, dated November 2025) - FCWF Permit Noise Compliance Testing, prepared by sonus (S870.2C3, dated February 2026) - DPHI letter dated 15/12/25 agreeing to extension of time to submit operational noise monitoring report from 11/10/25 to 11/12/25 - Lodgement of first round of operational monitoring to DPHI dated 13/11/25 - Lodgement of second round of operational monitoring to DPHI dated 24/02/26 - Correspondence to DPHI dated 25/02/26 committing to undertaking additional monitoring at data point H95 	<p>The first operational monitoring report (S870.2C2, dated November 2025) covered testing in 2 separate periods:</p> <ul style="list-style-type: none"> • Between November 2024 and February 2025, during commissioning of the project • Between September and November 2025 following commencement of operation of the project <p>Results indicated that:</p> <ul style="list-style-type: none"> • During November 2024 and February 2025, the three test locations achieved the Noise Criteria applicable under the Project Approval • During September and November 2025, only a reduced dataset was available due operational outages, however this reduced dataset achieved the Noise Criterial applicable under the Project Approval • A recommendation was made to repeat the operational testing <p>The second operational monitoring report (S870.2C3, dated February 2026) covered testing between 08 December 2025 to 20 January 2026.</p> <p>Results indicated that:</p> <ul style="list-style-type: none"> • During the period of testing, noise levels at test locations achieved the Noise Criteria applicable under the Project Approval • Re-testing was recommended at monitoring test point H95 due to insufficient data collection, however reduced data set indicated the test point achieved the Noise Criteria applicable under the Project Approval • The project was, overall, considered to be compliant with the relevant Noise Criteria at the test locations <p>The proponent has confirmed that the recommended re-testing is scheduled to be completed in early August, once annual maintenance is completed in CG1 and CG2.</p>	Compliant
Residence	Criteria (dB(A)) Referenced to Hub Height (85m AGL) Wind Speed (m/s)																																																																																																		
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Operational Noise Criteria - Ancillary Infrastructure																																																																																																			

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
G8	<p>The Proponent must ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) $L_{Aeq(15 \text{ minute})}$ at any residence not associated with the project.</p> <p>Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the <i>NSW Industrial Noise Policy</i> (or its equivalent).</p>	<p>- FCWF Permit Noise Compliance Testing, prepared by sonus (S870.2C3, dated February 2026)</p>	<p>The operational noise report (S870.2C3, dated February 2026) covered testing between 08 December 2025 to 20 January 2026.</p> <p>Results indicated that:</p> <ul style="list-style-type: none"> Noise from the ancillary infrastructure, i.e. the substation, was predicted to be less than 25 dB(A) at the nearest non-associated receptor, and therefore compliant with this condition. 	Compliant
Operational Noise Monitoring				
G9	<p>Within 3 months of the commencement of operations (or the commencement of operation of a cluster of turbines, if the project is to be staged), unless otherwise agreed by the Planning Secretary, the Proponent must:</p> <p>(a) undertake noise monitoring to determine whether the project is complying with the relevant conditions of this approval; and</p> <p>(b) submit a copy of the monitoring results to the Department and the EPA.</p>	<p>- FCWF Permit Noise Compliance Testing, prepared by sonus (S870.2C2, dated November 2025)</p> <p>- DPHI letter dated 15/12/25 agreeing to extension of time to submit operational noise monitoring report from 11/10/25 to 11/12/25</p> <p>- Lodgement of first round of operational monitoring to DPHI dated 13/11/25</p> <p>- Lodgement of second round of operational monitoring to DPHI dated 24/02/26</p> <p>- FCWF Initial Operational Commencement Report in accordance with EPL 21404 – R4.1, 11/11/25, prepared by Iberdrola</p> <p>- Email correspondence dated 11/11/25 showing submission of Initial Operational Commencement Report to EPA</p>	<p>2 rounds of operational noise monitoring were undertaken as detailed below. The first round of noise monitoring commenced in September 2025, which is within 3 months of the commencement of operations.</p> <p>An extension of time to submit the monitoring results was agreed to by Planning Secretary and the extended timeframe deadline was met.</p> <p>The first operational noise report (S870.2C2, dated November 2025) covered operational testing between September and November 2025 following commencement of operation of the project.</p> <p>The second operational noise report (S870.2C3, dated February 2026) covered additional post-construction testing between 08 December 2025 to 20 January 2026.</p> <p>Results indicated that:</p> <ul style="list-style-type: none"> During the period of testing, noise levels at test locations achieved the Noise Criteria applicable under the Project Approval Re-testing was recommended at monitoring test point H95 due to insufficient data collection, however reduced data set indicated the test point achieved the Noise Criteria applicable under the Project Approval The project was, overall, considered to be compliant with the relevant Noise Criteria at the test locations <p>Evidence was sighted by the auditor verifying submission of the first round of monitoring results to DPHI and EPA.</p> <p>The proponent has confirmed that the recommended re-testing is scheduled to be completed in early August, once annual maintenance is completed in CG1 and CG2.</p>	Compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252


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Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
G10	The Proponent must undertake further noise monitoring of the project if required by the Planning Secretary.	N/A – further noise monitoring has not been requested by the Planning Secretary	N/A	Not Triggered
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN				
G11	<p>Prior to the commencement of operation, or as otherwise agreed by the Planning 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>(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).</p> <p>The Plan shall be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of operation, or as otherwise agreed by the Planning Secretary. Operation shall not commence until written approval has been received from the Planning Secretary. Upon receipt of the Planning 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>	<ul style="list-style-type: none"> - Operational Environmental Management Plan (OEMP), Flyers Creek Wind Farm Project (Rev. 01, 19/05/25), prepared by Iberdrola. - DPHI conditional approval letter of OEMP (Rev. 1, 19/05/25) dated 06/06/25 - Correspondence to DPHI dated 04/07/25 from proponent providing date of commencement of operation as 11/07/25 - BBAMP, FCWF, July 2024 (Report No. 18091 (4.7), updated by Nature Advisory - Lodgement of BBAMP Rev. 4.7 to Major Projects Portal on 11/07/25 - CPHR letter dated 14/11/25 endorsing Rev. 4.7 of the BBAMP noting revisions are minor and administrative in nature. - Follow-up with DPHI dated 24/02/26 to obtain approval of BBAMP Rev 4.7 - FCWF Initial Operational Commencement Report in accordance with EPL 21404 – R4.1, 11/11/25, prepared by Iberdrola - Email correspondence dated 11/11/25 showing submission of Initial Operational Commencement Report to EPA - Extract showing active inducted user list - Weekly environmental checklists (operation phase) dated 13/03/26, 12/12/25, 10/10/25 and 01/08/25 	<p>The OEMP was prepared and submitted to DPHI more than one month prior to commencement of operation.</p> <p>The OEMP received conditional approval of the OEMP on 06/06/25, pending revision and resubmission of the Bird and Bat Adaptive Management Program (BBAMP) by 29/08/25. The proponent submitted a revised BBAMP (Rev 4.7) on 11/07/25 within the DPHI deadline. CPHR have endorsed BBAMP (Rev. 4.7) and, as of 12/03/26, Iberdrola were still waiting for a response from DPHI regarding the approval of Rev 4.7 of the BBAMP.</p> <p>Section 4.4 of the OEMP reports that it has been prepared in accordance with the <i>Guideline for the Preparation of Environmental Management Plans</i> (Department of Infrastructure, Planning and Natural Resources, 2004). Appendix H provides a completed checklist from the above-referenced guideline showing all requirements have been addressed.</p> <p>Section 4.7 of the OEMP discusses consultation.</p> <p>A discussion of the requirements of relevant sub-conditions is as follows:</p> <p>G11(a): Section 4.2.3 of the OEMP lists operational activities. Section 4.6 discusses Section Completion stages and transition from the Construction EMP to the OEMP.</p> <p>G11(b): The OEMP discusses the Project Approval (Section 4.2.1), Environment Protection Licence (Section 5.4) and other legislation and policies are discussed throughout the document.</p> <p>G11(c): Section 4 (Introduction) of the OEMP discusses overall environmental policies, guidelines and principles</p> <p>G11(d): Section 5.2 of the OEMP discusses Role Structure and Responsibility and Section 5.20 discussed Inductions and Training</p> <p>G11(e): Section 5.15 discusses Environmental Risk Analysis and Appendix F of the OEMP provides an excerpt from a “live” Environmental Risk Register which is periodically updated</p> <p>G11(f): Sections 6 – 20 of the OEMP discuss management and monitoring of potential impacts and mitigation measures. Section 5.16 discusses monitoring via a weekly</p>	Compliant

Audit Table of Project Approval (including Modifications 1 – 5) Conditions: Flyers Creek Wind Farm, MP 08_0252

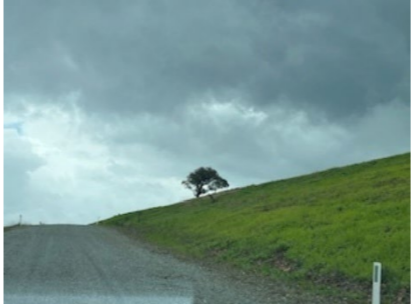
[Original Project Approval text in black, Modifications 1-4 text in blue, Modification 5 text in red]

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
			<p>inspection checklist. A copy of the checklist is presented within Appendix B.</p> <p>In accordance with Section 5.18, a report was submitted to EPA as per requirements of the project EPL reporting to EPA.</p> <p>4 weekly checklists were viewed by the Auditor which confirmed that the checklists were being completed and covered the items provided in the OEMP checklist.</p>	
G12	<p>As part of the Operation Environmental Management Plan required under condition G11, the Proponent shall prepare and implement a Bushfire Management Plan to detail measures to prevent fires during the operational phase including:</p> <p>(a) work involving risk of ignition that should not be carried out during a total fire ban;</p> <p>(b) availability of fire suppression equipment;</p> <p>(c) storage and maintenance of fuels and other flammable materials;</p> <p>(d) notification of the Canobolas Zone Rural Fire Service Fire Control Centre for works proposed to be carried out during high fire danger periods to ensure weather conditions are appropriate; and</p> <p>(e) managing operations to assist bush fire fighting in the vicinity of the wind farm (e.g potentially switching off turbines).</p>	<p>- Operational Environmental Management Plan (OEMP), Flyers Creek Wind Farm Project (Rev. 01, 19/05/25), prepared by Iberdrola.</p> <p>- FCWF Fire Management Plan (Bushfire Management Plan - BMP), Rev. FINAL, 21/11/24, prepared by Australian Bushfire Protection Planners</p> <p>- FCWF Fire Response and Emergency Management Plan (FERP), Rev 2.1 dated 25/06/25</p>	<p>Section 12 of the OEMP discusses the Bushfire Risk Management Plan. A table provides in Section 12.1 cross-references the requirements of this condition with relevant sections of the OEMP, BMP and FERP.</p> <p>Opportunity for Improvement No. 2 (IEA2): During the next OEMP update, please update Section 12 (including table in Section 12.1) for clarity as there are some incorrect references to Appendix H of the FCWF BMP. In addition, please ensure correct naming of the BMP and FERP throughout Section 12 as there are currently different reference names for these plans. It is suggested that the frequency and scope of routine environmental monitoring could also be reviewed during the next OEMP update as the site is now well established and operating in a compliant manner.</p>	Compliant
SCHEDULE H – ADDITIONAL PROCEDURES				
DECOMMISSIONING				
H1	<p>Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Proponent shall rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 4.</p>	N/A	N/A – related to decommissioning phase of project	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																		
	<p><i>Table 4: Rehabilitation Objectives</i></p> <table border="1"> <thead> <tr> <th data-bbox="379 390 641 428">Feature</th> <th data-bbox="647 390 1279 428">Objective</th> </tr> </thead> <tbody> <tr> <td data-bbox="379 432 641 533">Project site (as a whole)</td> <td data-bbox="647 432 1279 533"> <ul style="list-style-type: none"> • Safe, stable and non-polluting • Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible </td> </tr> <tr> <td data-bbox="379 537 641 575">Revegetation</td> <td data-bbox="647 537 1279 575"> <ul style="list-style-type: none"> • Restore native vegetation generally as identified in the EA </td> </tr> <tr> <td data-bbox="379 579 641 659">Above ground wind turbine infrastructure (excluding wind turbine pads)</td> <td data-bbox="647 579 1279 659"> <ul style="list-style-type: none"> • To be decommissioned and removed, unless the Planning Secretary agrees otherwise </td> </tr> <tr> <td data-bbox="379 663 641 701">Wind turbine pads</td> <td data-bbox="647 663 1279 701"> <ul style="list-style-type: none"> • To be covered with soil and/or rock and revegetated </td> </tr> <tr> <td data-bbox="379 705 641 764">Above ground ancillary infrastructure</td> <td data-bbox="647 705 1279 764"> <ul style="list-style-type: none"> • To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Planning Secretary </td> </tr> <tr> <td data-bbox="379 768 641 827">Internal access roads</td> <td data-bbox="647 768 1279 827"> <ul style="list-style-type: none"> • To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Planning Secretary </td> </tr> <tr> <td data-bbox="379 831 641 869">Land use</td> <td data-bbox="647 831 1279 869"> <ul style="list-style-type: none"> • Restore or maintain land capability as described in the EA </td> </tr> <tr> <td data-bbox="379 873 641 905">Community</td> <td data-bbox="647 873 1279 905"> <ul style="list-style-type: none"> • Ensure public safety </td> </tr> </tbody> </table>	Feature	Objective	Project site (as a whole)	<ul style="list-style-type: none"> • Safe, stable and non-polluting • Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible 	Revegetation	<ul style="list-style-type: none"> • Restore native vegetation generally as identified in the EA 	Above ground wind turbine infrastructure (excluding wind turbine pads)	<ul style="list-style-type: none"> • To be decommissioned and removed, unless the Planning Secretary agrees otherwise 	Wind turbine pads	<ul style="list-style-type: none"> • To be covered with soil and/or rock and revegetated 	Above ground ancillary infrastructure	<ul style="list-style-type: none"> • To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Planning Secretary 	Internal access roads	<ul style="list-style-type: none"> • To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Planning Secretary 	Land use	<ul style="list-style-type: none"> • Restore or maintain land capability as described in the EA 	Community	<ul style="list-style-type: none"> • Ensure public safety 			
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Community	<ul style="list-style-type: none"> • Ensure public safety 																					
Progressive Rehabilitation																						
H2	<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>- Site inspection documents and photo records between July and December 2025 showed evidence of rehabilitation of the following:</p> <ul style="list-style-type: none"> • Concrete Batching plant – progressive pasture revegetation improvement • Track 11 Access Road Entry - progressive batter revegetation improvement • GE Laydown Area - progressive rehabilitation improvements in GE Laydown Area • Main Site Compound - progressive pasture revegetation • Cable corridor below sub-station – progressive rehabilitation • MV U/G Cable Corridor below sub-station – progressive rehabilitation and stabilised with groundcover, no slope scouring evident <p>- Audit site observations</p> 	<p>Based on review of site inspection records, photos and the audit site visit it is considered that progressive rehabilitation has occurred following the construction phase.</p> <p>Construction areas were very well rehabilitated with good vegetation cover and extensive re-profiling to blend with surrounding landscapes.</p>	Compliant																		

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[Original Project Approval text in black, Modifications 1-4 text in blue, Modification 5 text in red]

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
				
H3	<p>Prior to the cessation of operations, the Proponent shall prepare a detailed Decommissioning Plan for the Project to the satisfaction of the Planning Secretary. This plan must outline the detailed measures that would be implemented to achieve the objectives in Table 4 above.</p>	N/A	N/A – related to decommissioning phase of project	Not triggered
H4	<p>Unless otherwise agreed by the Planning Secretary, the Proponent shall commission an independent, qualified person or team to undertake the following in consultation with the relevant road authority:</p> <p>(a) prior to the commencement of decommissioning, review the proposed route and existing access provisions to the Project to determine whether the route and existing provisions allow for safe access of decommissioning vehicles associated with the Project (including appropriate site distances 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 decommissioning and at the full expense of the Proponent; and</p> <p>(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 decommissioning 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 decommissioning and at the full expense of the Proponent.</p> <p>Upon determining the haulage route(s) for decommissioning vehicles associated with the Project, and prior to decommissioning, 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 decommissioning of the Project. The Report shall be submitted to the relevant road authority for review prior to the commencement of haulage.</p> <p>Within three months of completion of decommissioning, 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.</p> <p>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.</p>	N/A	N/A – related to decommissioning phase of project	Not triggered

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[Original Project Approval text in black, Modifications 1-4 text in blue, Modification 5 text in red]

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
H5	<p>Prior to the commencement of decommissioning, or as otherwise agreed by the Planning Secretary, the Proponent shall prepare and implement (following approval) a Decommissioning Environmental Management Plan for the Project. The Plan shall include, but not necessarily be limited to: (a) a description of activities to be undertaken during decommissioning of the Project (including staging and scheduling);</p> <p>(b) statutory and other obligations the Proponent is required to fulfil during decommissioning, including approval / consents, consultations and agreements required from authorities and other stakeholders under key legislation and policies;</p> <p>(c) a description of the roles and responsibilities for relevant employees involved in the decommissioning of the Project, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors are aware of their environmental and compliance obligations under these Conditions of Approval;</p> <p>(d) an environmental risk analysis to identify the key environmental performance issues associated with the decommissioning phase; and</p> <p>(e) details of how environmental performance will be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts (including any impacts arising from the staging of the decommissioning of the Project). The Plan shall be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of decommissioning, or as otherwise agreed by the Planning Secretary.</p>	N/A	N/A – related to decommissioning phase of project	Not triggered

Appendix D

Site Inspection Photographs (19 March 2026)



Plate 1: View of signage at the front gate of the Flyers Creek Wind Farm Operations and Maintenance (O&M) Facility showing key project information including contact details. A high standard of landscaping, drainage and road finishing work were noted at the time of the audit site visit.



Plate 2: View of site rehabilitation and landscaping works at the site of the O&M Facility at turbines 1-8. Plantings were noted to be healthy and showing vigorous growth. Significant re-profiling, top-soiling and mulching were also evident with resultant excellent rehabilitation outcomes.



Plate 3: View of key project information on display at the entrance to the O&M Facility office. Information included relevant policies and procedures as well as incident management protocols and environmental sensitivity maps. Information was of an excellent standard with a strong focus on compliance and environmental best-practice.



Plate 4: View of a banded Dangerous Good storage cabinets within the O&M Facility. All materials were very well organised and catalogued with SDS's present. Overall house-keeping, procedures and record keeping were of an excellent standard across the site.



Plate 5: View of fire-fighting fittings at the O&M Facility. Project personnel confirmed that there was on-going liaison with RFS and all their requirements had been met, including provision of access at any time.



Plate 6: View of site infrastructure (point of connection). Building colours were noted to be of low-reflectivity and off-white colour. Lighting was confirmed as low-intensity and only used on an as-needed basis. In particular, it was not dusk- or movement-activated to ensure that no lights were operating at night. Well established Asset Protection Zones were noted to present at all viewed infrastructure locations.



Plate 7: View of turbines 33-35 located to the east of Errowanbang Road. Turbine construction materials were noted to be of low-reflectivity and off-white / pale-grey in colour. Construction areas were very well rehabilitated with good vegetation cover and extensive re-profiling to blend with surrounding



Plate 8: View of signage and bollards surrounding the Hopkins Trig Station heritage site.



Plate 9: View of landscape plantings and groundcover at the point of transmission line connection off Cadia Road. Robust groundcover and thriving landscape plantings were noted at this location which was typical of all areas viewed during the audit site visit.



Plate 10: View of road upgrade and rehabilitation works at the intersection of Panuara Road and Errowanbang Road. All works completed were conducted in consultation with Blayney Shire Council with good results evident.



Plate 11: View exclusion zone signage in place at the site of a *Eucalyptus canobolensis* off Cadia Road. This tree is located beyond the project boundary, however Iberdrola conduct weed maintenance and have installed signage to ensure protection and habitat enhancement at this location.



Plate 12: View of fauna crossing infrastructure forming part of the habitat enhancement program that was implemented following the *E. canobolensis* clearing incident that occurred in 2022 during construction of the project. A local ecology specialist was closely involved in the design and implementation of the program and excellent outcomes were evident including an increase in squirrel glider numbers at this location.



Plate 13: View of a fauna nest box installed as part of the habitat enhancement program that was implemented following the *E. canobolensis* clearing incident. Monitoring of nest boxes has confirmed that squirrel gliders are actively using the nest boxes in this area.



Plate 14: View of a fauna nest box installed as part of the habitat enhancement program that was implemented following the *E. canobolensis* clearing incident. In this instance the pictured nest box was constructed from a limb of the felled-tree associated with the 2022 incident.

Appendix E

Independent Audit Declaration Form

INDEPENDENT AUDIT REPORT DECLARATION FORM

(Template from DPIE Independent Audit Post Approval Requirements, May 2020).


Project Name	Flyers Creek Wind Farm
Consent Number	MP 08_0252
Description of Project	Wind Farm
Project Address	Errowanbang Road, Flyers Creek
Proponent	Flyers Creek Wind Farm Pty Ltd
Title of Audit	Flyers Creek Wind Farm MP 08_0252 Independent Environmental Audit No. 2 Report (April 2026)
Date	20 April 2026

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (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) 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	Toby Hobbs
Signature	
Qualification	MEnvMgmt, Lead Auditor (Exemplar Global)
Company	Vantage Environmental Management Pty Ltd
Company Address	PO Box 378, Albury NSW 2640