

Flyers Creek Wind Farm (MP 08_0252)

Independent Environmental Audit

Action Response Plan

June 2023



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1. INTRODUCTION / BACKGROUND

Flyers Creek Wind Farm Pty Ltd, the proponent of the Flyers Creek Wind Farm (NSW Department of Planning and Environment (DPE) Project Approval: MP 08_0252), herein referred to as the "Project" has prepared this Audit Response Plan to the findings as detailed in the Independent Environmental Audit (IEA) report (June 2023) undertaken by Vantage Environmental Management Pty Ltd. The IEA covered the period of commencement of construction (04 April 2022) to the date of the audit site inspection on 10 May 2023.

Section 2 below and corresponding tables provides the proponents response and actions for closure to the IEA findings as presented in the above mentioned report.

2. IEA ACTION RESPONSE

Outlined in Table 1 below is Iberdrola's action responses to the IEA non-conformance findings with specified time frames for closure.

Outlined below in Table 2 below is Iberdrola's action response to the IEA opportunity for improvement findings with specified time frames for closure.

Table 1: IEA non-conformance findings

Condition Number	Compliance Requirement	Independent Audit Findings	Independent Audit Recommendations	Proponent's Proposed Action/Action Taken/Response	Proposed Action Due Date
C2	<p>The Proponent shall carry out the Project:</p> <p>(a) generally in accordance with the EA; and</p> <p>(b) in accordance with the conditions of this approval.</p> <p>Note: The general layout of the project is depicted in Figure 1-1 in Appendix 1.</p>	<p>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.</p>	<p>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.</p>	<p>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.</p> <p>GLC (as PC) will utilise their weekly environmental inspection form and clearing permit form to ensure the maintenance of the control measures implemented.</p> <p>Iberdrola/Jacobs will undertake a compliance check of the implementation of the management measures outlined in the approved Construction Fauna and Flora Management Plan.</p>	17th August 2023
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)</p> <p>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 (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>	<p>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.</p>	<p>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.</p>	<p>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.</p> <p>The project team will review its compliance tracker quarterly to include any relevant management systems requirements to ensure any future requirements are adhered to.</p>	17th August 2023
F20	<p>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> <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> <p>i. compounds and ancillary facilities management;</p> <p>ii. noise and vibration;</p> <p>iii. traffic and access;</p> <p>iv. soil and water quality and spoil management;</p> <p>v. air quality and dust management;</p>	<p>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 (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.</p>	<p>Recommendation No. 3 (FCWF-IEA1-R3): In response to Non-compliance No. 3, the monitoring schedule listed within Section 10.1 of the Construction Environmental Management Plan should be reviewed to ensure all required monitoring programs, inclusive of documentation, are conducted on an on-going basis.</p>	<p>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 approved management plan. GLC will allocate personnel and subconsultants nominated to ensure frequency and suitable coverage is implemented.</p> <p>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.</p> <p>Iberdrola/Jacobs will undertake a compliance check of the implementation of the management measures outlined in the approved Construction Environmental Management Plan.</p>	17th August 2023

	<p>vi. management of Aboriginal and non-Aboriginal heritage;</p> <p>vii. soil contamination, hazardous material and waste management;</p> <p>viii. management of ecological impacts; and</p> <p>ix. hazard and risk management.</p> <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>				
F21 (b)	<p>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 Interim Construction Noise Guidelines (DECC, 2009) and shall include, but not be limited to:</p> <p>i. identification of sensitive receivers and relevant construction noise and vibration goals applicable to the Project stipulated in this approval;</p> <p>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;</p> <p>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);</p> <p>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);</p> <p>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</p> <p>vi. mechanisms for the monitoring, review and amendment of this Plan.</p>	<p>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.</p>	<p>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.</p>	<p>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.</p> <p>Iberdrola/Jacobs will undertake a compliance check of the implementation of the management measures outlined in the approved Construction Noise and Vibration Management Plan.</p> <p>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.</p> <p>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.</p>	17th August 2023
F21 (d)	<p>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 DoI – L&W and Blayney Shire Council and include, but not necessarily be limited to:</p> <p>i. details of construction activities and their locations, which have the potential to impact on water courses, storage facilities, stormwater flows, and groundwater;</p> <p>ii. surface water and ground water impact assessment criteria consistent with Australian and New Zealand Environment Conservation Council (ANZECC) guidelines;</p> <p>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;</p> <p>iv. management measures for contaminated material and a contingency plan to be implemented in the case of unanticipated discovery of contaminated material during construction;</p> <p>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</p> <p>vi. mechanisms for the monitoring, review and amendment of this Plan.</p>	<p>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 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.</p>	<p>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 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.</p>	<p>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.</p> <p>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 associated with the EPA mandated Pollution Reduction Program.</p> <p>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.</p> <p>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.</p>	17th August 2023

Table 2: IEA opportunity for improvement findings

Condition Number	Compliance Requirement	Opportunity for Improvement	Proponent's Proposed Action/Action Taken/Response	Proposed Action Due Date
D10	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <p>(a) all relevant Australian Standards;</p> <p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997).</p> <p>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.</p>	<p>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.</p>	<p>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.</p> <p>GLC (as PC) will capture performance of the control measures implemented in their weekly environmental inspection form.</p>	31st August 2023
D29	<p>The Proponent shall maximise the reuse and / or recycling of waste materials generated on site by the Project, to minimise the need for treatment or disposal of those materials outside the site.</p>	<p>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.</p>	<p>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.</p> <p>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.</p> <p>GLC (as PC) will capture performance of waste management onsite in their weekly environmental inspection.</p>	31st August 2023
D31	<p>The Proponent shall ensure that all liquid and / or non-liquid waste generated on the site is assessed and classified in accordance with Waste Classification Guidelines (DECC, 2008), or any future guideline that may supersede that document, and where removed from the site is only directed to a waste management facility lawfully permitted to accept the materials.</p>	<p>Opportunity for Improvement No. 3: Review Waste Register and update as necessary with all required information within Waste Management Protocol</p>	<p>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:</p> <ul style="list-style-type: none"> - 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 - 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>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>	31st August 2023
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 AS 4269: Complaints Handling 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>	<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, pre-start 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>	31st August 2023
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;</p> <p>(b) audit under condition E8; or</p> <p>(c) any modification to the conditions of this approval,</p> <p>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>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>	31st August 2023

	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.			
F12	Soil and water management measures consistent with Managing Urban Stormwater - Soils and Construction Vols 1 and 2, 4th Edition (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.	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.	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. GLC (as PC) will capture performance of the erosion and sedimentation control measures implemented in their weekly environmental inspection form.	31st August 2023
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 Australian and New Zealand Environment Conservation Council (ANZECC) guidelines;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.	Opportunity for Improvement No. 7: Some evidence of mud-tracking/drag-out was noted from Project access points onto Panuara Road and 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.	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 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.	31st August 2023
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: - 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 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; - 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 National Parks and Wildlife Act 1974 (where relevant) including site identification, protection and conservation of Aboriginal cultural heritage;	Opportunity for Improvement No. 8: 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.	31st August 2023
		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.	31st August 2023
		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.	31st August 2023
		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.	31st August 2023
	A live register of all heritage investigations should be maintained as part of the CHMP;		GLC (as PC) will develop a live register of all heritage investigations and heritage sites discovered, including AHIMS site numbers of recorded aboriginal sites.	31st August 2023

	<ul style="list-style-type: none"> - 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 Heritage Act 1977 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>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;</p> <p>The above should be included in an annual review of the CHMP in accordance with CHMP section 8.3;</p> <p>The CHMP contact details for the relevant NSW Government regulatory agency need to be updated in CHMP Appendix D;</p> <p>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</p> <p>Heritage maps in GIS systems should be updated and physical maps displayed in relevant Project facilities should be replaced at least quarterly.</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>See response above.</p> <p>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> <p>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> <p>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> <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>31st August 2023</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> <p>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; 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>Opportunity for Improvement No. 9: Update mapping of native vegetation and clearing data. 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> <p>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> <p>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> <p>Improve details on monitoring as described in the Conditions of Consent is 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</p>	<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>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>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>GLC will review the monitoring requirements within the Conditions of Consent, including performance indicators (e.g. for rehabilitation or weed cover), 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>31st August 2023</p> <p>31st August 2023</p> <p>31st August 2023</p> <p>31st August 2023</p>

	<p>actions will be implemented and what happens if performance measures are not met;</p> <p>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> <p>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> <p>Expediting the Biodiversity Offset Package to ensure compliance with recommitting the offset liability within 2 years of start of 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>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>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>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 consultancy to assist us with retiring our offset liability through independent suppliers and the BCF. 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>31st August 2023</p> <p>31st August 2023</p> <p>31st August 2023</p>
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