	Goyder South Wind Farm Project	**CODE:**	GSWF-ELECNOR-EHS-PLN-0005
		REVISION:	13
		DATE:	18/07/2022
		STAGE:	**1A / 1B**

Title of the Report

Construction Environmental Management Plan

REV	DATE	STATUS
13	18/07/2022	Issued for Review

PROJECT:

Goyder South Hybrid Renewable Energy Facility

Sub-Stage A: Windfarm Stages 1A and 1B

DOCUMENT CODE:	TITLE:
GSWF-ELECNOR-EHS-PLN-0005	**Construction Environmental Management Plan** FINAL

EPBC REFERRAL SPECIFICATION

EPBC Referral number	Project name and proposed action	Proponent	ACN	Location of the action
2021/8957	Goyder South Hybrid Renewable Energy Facility - Wind Farm 1B	Goyder Wind Farm 1B Pty Ltd	649965944	5 km south of Burra, SA
2021/8958	Goyder South Hybrid Renewable Energy Facility - Wind Farm 1A	Goyder Wind Farm 1 Pty Ltd	643229869	10 km south of Burra, SA
2021/8959	Goyder South Hybrid Renewable Energy Facility – OTL and Substation	Goyder Wind Farm Common Asset Pty Ltd	649966138	Worlds End, SA

PROJECT SPECIFICATION

Document to:	GLC
Prepared by:	Briony Horner & Rebecca Phyland
Succession Ecology Project No.:	ES0522–02
File Name	Goyder South HREF _CEMP_v13_ May 22
Citation:	Succession Ecology (2021). Goyder Wind Farm, Construction Environment Management Plan. Succession Ecology report ES0522–02 prepared for GLC.

DOCUMENT HISTORY

Version	Issue Date	Description	Prepared By	Reviewed by	Approved By
v1	01/10/2021	Draft	Rebecca Phyland	Briony Horner	
v2	20/10/2021	Draft	Rebecca Phyland	Briony Horner	
V3	25/10/2021	Draft	Briony Horner	GLC	
V4	27/10/2021	Draft	Lucy Wood	Briony Horner	
V5	28/10/2021	Draft	Briony Horner	GLC	
V6	1/11/2021	Draft	Briony Horner	GLC	
V7	5/11/2021	Draft	Briony Horner	GLC	
V8	5/12/2021	Draft	Briony Horner	GLC	
V9	2/03/2022	Draft	Briony Horner	GLC and Neoen	
V10	14/4/2022	Active	Briony Horner	GLC	GLC
V11	11/05/2022	Active	Briony Horner	GLC	GLC
V12	25/05/2022	Active	Briony Horner & Doreen Marchesan	GLC	
V13	18/07/2022	Active	Briony Horner & Doreen Marchesan	GLC and Neoen	

ACKNOWLEDGEMENTS

Succession Ecology acknowledge the contributions from supporting documents produced by:

Neoen	Jacobs	Southfront
EBS Ecology	GHD	Chiron Aviation Consulting
Green Light Elecnor	Green Bean	Independent Heritage Consultants
WSP	EcoLogical	General Electrical

Succession Ecology staff involved in this project were:

- Rebecca Phyland, Lucy Wood and Doreen Marchesan (Research and Drafting)
- Luke Wagenknecht (Mapping)
- Briony Horner (Management and Review)

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ACRONYMS

Acronym	Description
ASIC	Australian Securities and Investments Commission
BoP	Balance of Plant
CASA	Civil Aviation Authority
CBS	Community Benefits Scheme
CEMP	Construction Environmental Management Plan
CFS	Country Fire Service
CNVMP	Construction Noise and Vibration Management Plan
Cwth	Commonwealth
DCCEEW	Department for Climate Change, Energy the Environment and Water (Cwth)
DEW	Department of Environment and Water (State)
DIT	Department of Infrastructure and Transport
DMP	Dust Management Plan
DNF	Decision Notification Form
EBS	Environmental and Biodiversity Services
EPA	Environmental Protection Authority
EHTM	Environment and Heritage Technical Manual
EPBC	*Environment Protection and Biodiversity Act 1999*
EMI	Electromagnetic Interference
EMS	Environmental Management System
EWMS	Environmental Work Method Statements
FERP	Fire and Emergency Response Plan
FFMP	Flora and Fauna Management Plan
GLC	Green Light Contractors
GSHREF	The Goyder South Hybrid Renewable Energy Facility
GWF	Goyder Wind Farm
Ha	Hectares
HF	High Frequency
HSE	Health Safety and Environment Manager
IECA	International Erosion Control Association
IMS	Integrated Management System
IS0	International Organisation for Standardisation
kV	Kilovolt
LTIFR	Lost Time Injury Frequency Rates
MNES	Matters of National Environmental Significance
MTIFR	Medically Treated Injury Frequency Rates
MW	Mega Watts
MWh	Mega Watt hours
NATA	National Association of Testing Authorities

Acronym	Description
NBS	Neighbour Benefits Scheme
NOTAM	Notice to Airmen
NPW	*National Parks and Wildlife Act 1972*
NSW	New South Wales (Australia)
NVC	Native Vegetation Council
OEMP	Operational Environmental Management Plan
PBTL	Pygmy Blue Tongue Lizard
PCEMP	Pre-construction Environmental Management Plan
PIRSA	Department of Primary Industries and Regions
PV	Photo Voltaic
RAW	RAW Recruitment
RDI	Research Development and Innovation
RMP	Rehabilitation Management Plan
SA	South Australia
SEB	Significant Environmental Benefit
CSEDMP	Construction Soil Erosion and Drainage Management Plan
SES	State Emergency Service
SWMS	Safe Work Method Statement
TEC	Threatened Ecological Communities
TMP	Traffic Management Plan
VOD	Vertical Obstacle Database
WHS	Work Health and Safety
WMP	Waste Management Plan
WTG	Wind Turbine Generator

1. INTRODUCTION

1.1 Background

The Goyder South Hybrid Renewable Energy Facility (GSHREF), to be developed south of Burra (Figure 1), is a hybrid power station comprising up to 1,200MW of wind generation, up to 600MW of solar PV generation and up to 900MW/1,800MWh of battery storage (Figure 2). The proposed connection point near Robertstown means that the project's large-scale battery would be in an ideal position to inject emergency power and fault current into the South Australian grid in the event of a fault impacting the proposed SA-NSW interconnector and enable the continued stable operation of the South Australian grid in any subsequent separation from the NSW grid.

The Goyder South Hybrid Renewable Energy Facility proposal comprises:

- A wind farm of up to 163 turbines with a capacity of up to 1200MW, a maximum hub height of 160m, a maximum blade length of 80m and an overall maximum height (tip height) of 240m;
- A solar farm (across two sites) of up to 3000 ha of solar panels with a capacity of up to 600MW;
- An energy storage facility (lithium-ion battery) with a capacity of up to 900MW/1,800MWh (2 hours);
- Associated infrastructure for connection to the electricity grid including three substations, access tracks, underground connection cabling and transmission lines;
- Permanent operations and maintenance compounds;
- Temporary construction compounds for both wind and solar components, including concrete batching plants; and
- A number of meteorological masts (in addition to those already on the site) to record wind speed and other meteorological data, both pre- and post- construction.

Neoen Australia Pty Ltd has sought Development Authorisation for the Goyder South Hybrid Renewable Energy Facility (Goyder South) pursuant to section 49 of the Development Act 1993 (SA). Approval was issued by the South Australian Minister for Planning and Local Government and Planning, dated 3 March 2021. Neoen is also submitting applications under the relevant legislation as a concurrent process with the Development Application to address all regulatory requirements for the project.

The project has been divided into three separate stages, each comprising 400MW wind, 200MW solar and 300MW/600MWh storage. The size and composition of each stage depends on the size and type of the demand from electricity customers. This will be communicated through approved engineering plans prior to site works commencing for each stage. Given the scale of the project stages, the development timeframes will be structured on a 'rolling' basis with construction of the entire project be completed within 12 years from the date of the approval. Within each stage construction will be undertaken as sub-stages focused on the key components of the project:

- Sub-Stage A – Wind farm and ancillary infrastructure;
- Sub-Stage B – Solar farm and ancillary infrastructure;
- Sub-Stage C – Battery energy storage facility and ancillary infrastructure;
- Sub-Stage D – Transmission lines; and
- Sub-Stage E – Balance of works.

Green Light Contractors (GLC) have been engaged as the Contractor to carry out the Goyder Wind Farm aspect of this development, being Sub-Stage A, Stage 1. These works will be divided into two stages (1A and 1B), 38 and 37 turbines respectively and the Overhead Line (OHL).

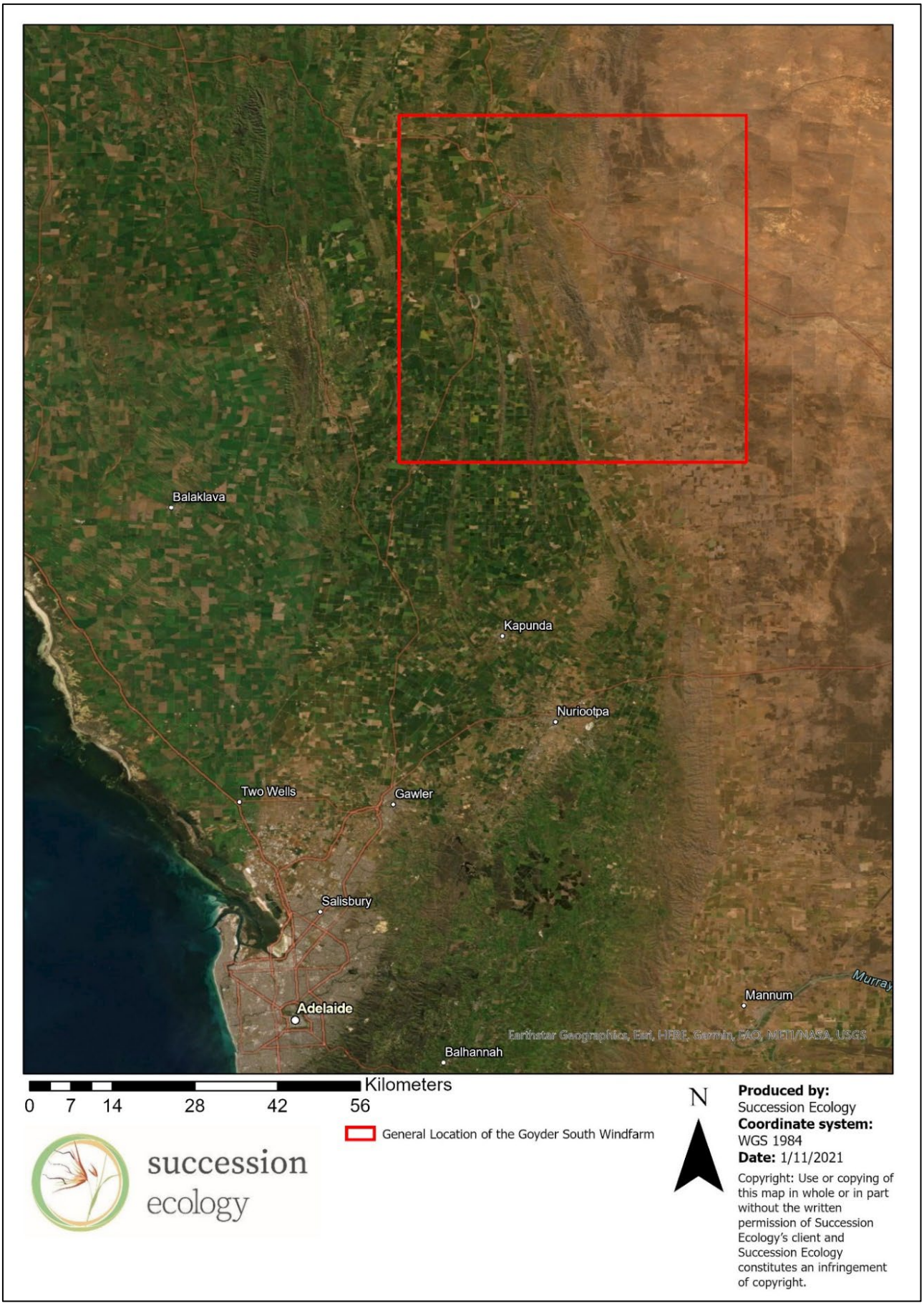

Figure 1: The Goyder South Hybrid Renewable Energy Facility, located south of Burra.

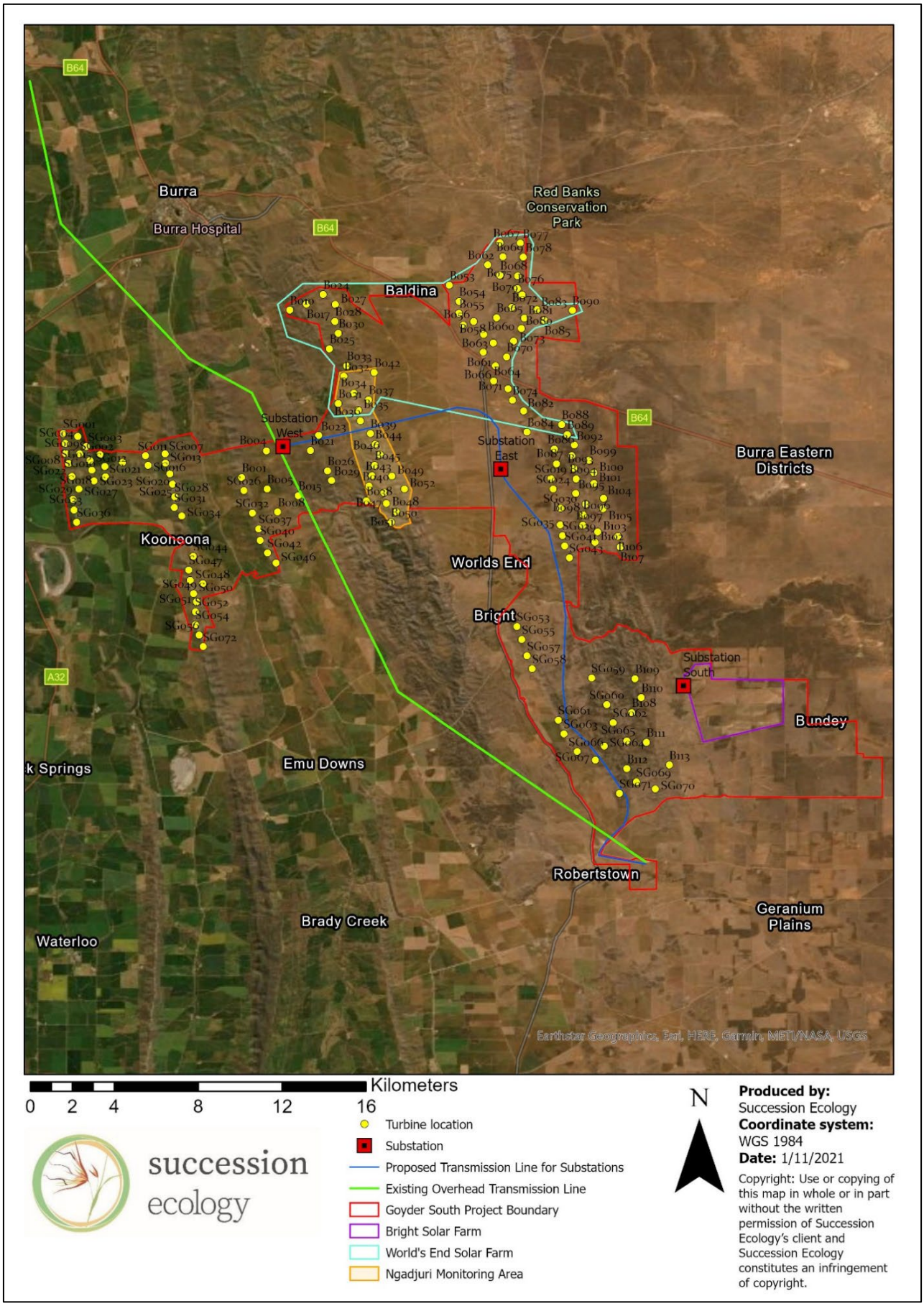

Figure 2: The Goyder South Hybrid Renewable Energy Facility, including wind, solar and battery storage.

1.2 Purpose

This Construction Environmental Management Plan (CEMP) has been prepared by Succession Ecology for GLC and applies to construction activities to be carried out on the Goyder Wind Farm Stage 1 (GWF Stage 1) in response to the Decision Notification Conditions as issued by the South Australian Minister for Planning and Local Government and Planning, dated 3 March 2021. This CEMP and the associated sub plans will be reviewed by GLC, Neoen, Department for Energy and Mining, Department for Infrastructure and Transport, and the Department for Environment and Water before submission to the Attorney Generals Department for approval.

The CEMP details the environmental management and mitigation measures, which will be implemented during the construction phase of the Goyder Wind Farm project. The primary objective of the CEMP is to reduce any associated adverse environmental impacts and satisfy regulatory requirements. It provides a framework for actions, responsibilities and protocols associated with environmental management with which GLC and their Contractors are required to adhere.

The mitigation and management measures detailed in this CEMP (and the associated sub-plans) are required as a minimum to meet the requirements of GLC's Integrated Environmental Management Policy, the Neoen Australia Pty Ltd Development Approval Conditions and commitments made by Neoen Australia in the development application process (Appendix A). Accordingly, this CEMP should be read in conjunction with the project specific sub-plans, including:

- Dust Management Plan
- Construction Soil Erosion and Drainage Management Plan
- Stormwater Management Plan
- Waste Management Plan
- Rehabilitation Management Plan (including landscaping and revegetation)
- Fire and Emergency Response Plan
- Operational Environmental Management Plan
- Decommissioning and Rehabilitation Plan (draft)
- Construction Noise and Vibration Management Plan
- Traffic Management Plan
- Flora and Fauna Management Plan

This CEMP has been prepared to cover those aspects of the development that will occur in Stage 1 (including wind farms 1A and 1B, transmission line, substation and the temporary construction facilities needed to support this Stage). For this reason CEMP aspects that relate to other parts of the project are not included (e.g., dust management for the solar farm construction).

1.3 Project Phases and Scope of Works

There are two phases of construction associated with GWF Stage 1, pre-construction and construction. The scope of works for each are:

Pre-Construction

The pre-construction phase includes site surveys, geotechnical investigations, construction of bench for compound area and laydown areas and installation of site compounds. The specific aspects of the development that will occur in the pre-construction phase have been addressed in the PCEMP.

Construction

The construction phase includes a temporary batching plant, satellite compound and batching plant, Meteorological Masts, Overhead Line, Construction Balance of Plant, Upgrade to public roads, Electrical Balance of Plant, Wind Turbine Generators, Permanent facilities. This CEMP has been prepared to cover the specific aspects of the development that will occur during the construction phase.

1.4 Objectives

The broad objective of this CEMP is to provide an Environmental Management System for GWF Stage 1 that will:

- Facilitate appropriate and timely responses to equipment failure, emergencies, or other unusual conditions that may cause environmental harm.
- Facilitate documentation, communication, and implementation of contingency plans.
- Ensure that all personnel responsible for the construction of the Project are aware of their environmental responsibilities.
- Ensure that environmental monitoring and review occurs to manage environmental components of the construction and to ensure continual improvement in this CEMP.
- Ensure that relevant information is retained and is communicated throughout the organisation.
- Ensure communication with the Department of Environment and Water (DEW), and Department of Infrastructure and Transport (DIT), Goyder Regional Council or other authorities as required by legislation.

1.5 Document Structure

The structure of this CEMP is as follows:

1) A description of GWF Stage 1 activities to be undertaken during development.
2) A description of the regulatory requirements and project commitments.
3) A description of the Environmental Management System for the GWF Stage 1.
4) Roles and responsibilities,
5) A description of the reporting, auditing, incident, non-compliance and document management procedure
6) A description of the training and inductions process.
7) In accordance with Condition 9 of the approval, the CEMP includes mitigation and management measures, as well as monitoring requirements, to address the following environmental elements:
    - Noise and vibration
    - Air quality and dust
    - Native flora and fauna
    - Cultural heritage
    - Weeds and pests
    - Traffic and access
    - Erosion and storm water management
    - Site Rehabilitation
    - Storage and handling of hazardous substances

- Water quality
- Fire risk and Emergency Response
- Contamination
- Waste management
- Public safety
- Community Engagement
- Visual Amenity
- Electromagnetic Interference
- Land Interests

8) Emergency response planning
9) A description of the Sub-plans required to support the CEMP.

2 CONSTRUCTION DETAILS

2.1 Location

The proposed Goyder South development will be located south of Burra and north of Robertstown in the Goyder Regional Council area and the Hundred of Kooringa (Figure 1). The development spans the Worlds End Valley with GWF turbines located on the western ridgelines and the eastern ridgelines (Figure 2). The Worlds End solar site is located in the centre of the valley on the western side of the Worlds End Highway, and Bright Solar site is located to the north-east of Robertstown. The GWF Stage 1 project area is located within the centre of the northern extent of the project. It is approximately 5.5km south of Burra and located between Koonoona Road and Top Road, covering an area approximately 11km long (north-south) and 7km wide (east-west). The coordinates detailed in Appendix B delineate the boundary of the GWF Stage 1, which covers an area of 7610 hectares.

There are two main Highways providing access to the project area: the Barrier Highway running roughly north south and the Goyder Highway which runs roughly north-west. This region has a relatively low population density, with most residential premises located in a number of towns, Burra being the largest and the key service centre within the region. This township is identified as an important centre for aged services, affordable housing, and temporary housing for short term residents. Robertstown is located on the Worlds End Highway between Eudunda and Burra. Originally strategically located as a service centre for the surrounding agricultural and mining activities this town further developed in response to the need for a supply depot and the supply of water (Morgan-Whyalla pipeline). The land use in the region is predominantly agricultural, mostly grazing and some cropping.

The Burra/Robertstown region is typical of the dry mid north. It can experience cool to cold winters and warm to hot summers. This area is on the edge of Goyder's Line and has experienced drought conditions for the last three years. Much of the area was cleared of vegetation during the mining period and the land on which the project site is situated has been cropped and grazed since the late 1800s. Remnant native vegetation tends to exist in the steeper areas of the ranges and in patches along drainage lines. Remnant road-side vegetation and patches of remnant vegetation are more common toward the southern end of the project site. Ecological surveys have identified the presence of threatened flora and fauna species on the site. A number of protected areas (conservation parks and vegetation heritage areas) are located near the project area. Burra Creek is an important ecological corridor that runs through the project area.

The topography of the project area comprises undulating hills typical of the eastern Mount Lofty Ranges, with steep escarpments present along geological fault zones, particularly at the eastern extent of the ranges. The site is in an area bounded by known fault lines that are seismically active. The likelihood of a major earthquake occurring is not known, however no significant (>4 magnitude) earthquakes have been recorded in the area. Steep sided valleys occur where watercourses cross the escarpments. The project is located within the Northern Ranges portion of the SA Murray-Darling Landscape Management Area. As such it is acknowledged that the protection of the quality of water resources is important in this area, particularly surface water that feeds into the Burra Creek system. The soils of the eastern slopes of the Mount Lofty Ranges generally have a high to very high erosion potential and are likely to be subject to water and wind impacts, if the ground is disturbed. The Granite Boulders Area Geological Site is also located within the project area.

2.2 Project Description

The GWF (Sub-Stage A of Stage 1) will be a wind farm of 75 wind turbine generators (WTG) with a maximum hub height of 121m, a maximum blade length of 78m and an overall maximum height (tip height) of 199m (Figure 3). Works will be divided into two stages (1A and 1B) and will include:

- 1A with 38 WTGs with nameplate capacities of 209MW, associated balance of plant (BOP) a collector substation and associated infrastructure for connection to the electricity grid including, access tracks, underground connection cabling and a 32 km of 275kv transmission line.
- 1B with 37 WTGs with nameplate capacities of 203.5MW and the associated BOP.
- Permanent operations and maintenance compounds.
- Temporary construction compound, including concrete batching plant; and

- A number of meteorological masts (in addition to those already on the site) to record wind speed and other meteorological data, both pre- and post- construction.

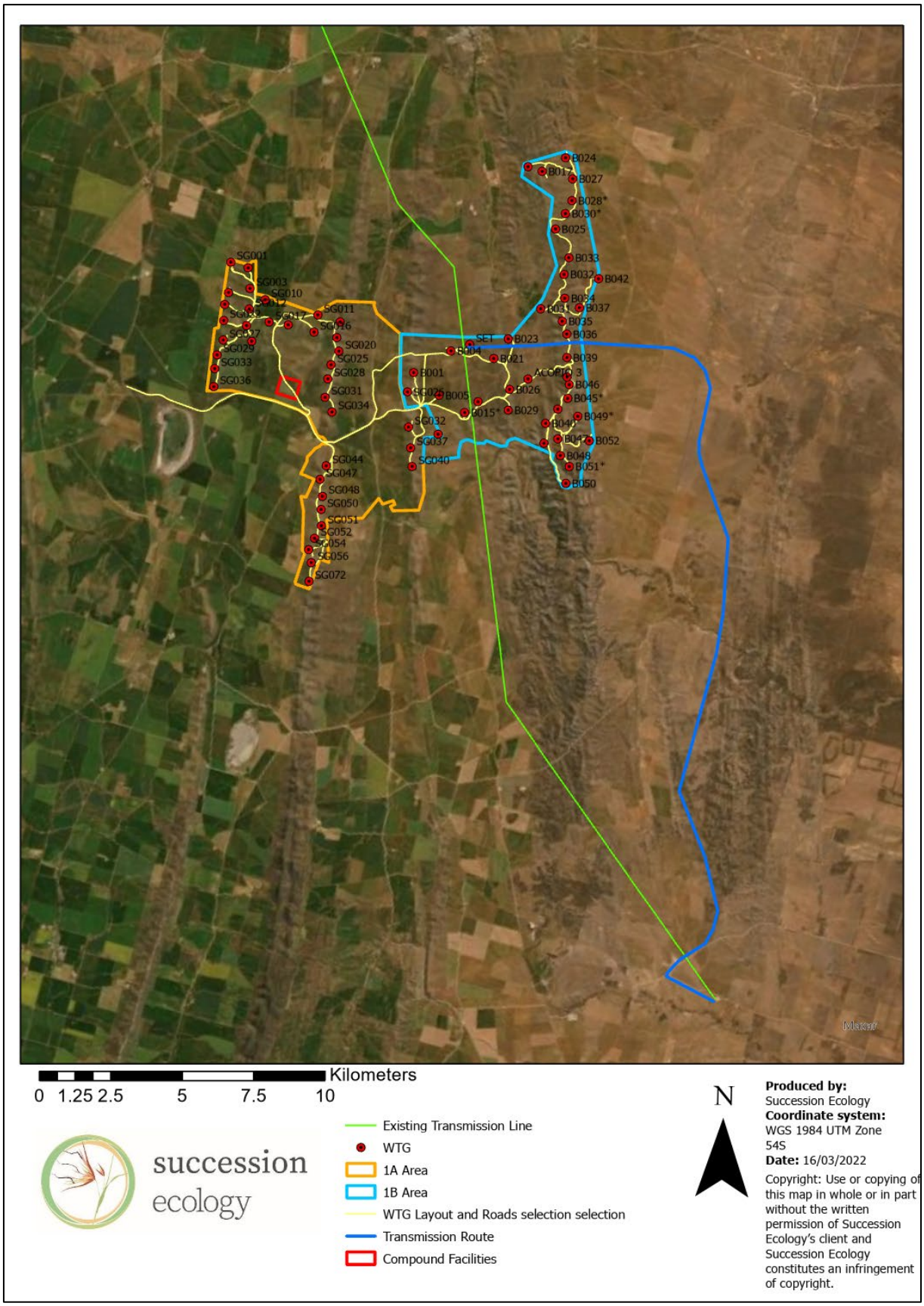

Figure 3: Stage 1A and B, the OHL and proposed turbine layout of Goyder South Hybrid Renewable Energy Facility.

2.3 Construction Activities

The project involves the construction of 75 WTGs in stages 1B (GWF 1 Stage 1B) and 1A. A description of project activities is presented in Table 1.

Table 1: Project Components

Component	Description
Commencement of Site Works	Preliminary site works (excluding investigative and geotechnical works, site establishment, demolition, and service installation) associated with the development.
Commencement of Construction	Construction of all infrastructure, including access tracks, WTGs, compounds, buildings etc.
Commencement of operations	The formal commissioning of a completed project stage to connect to the electricity network.
Project site	The land within the cadastral boundaries of all properties involved with the Goyder South project comprising an area of 28,000 ha with GWF 1 Stage being approximately 3810.68 ha for 1A and 4209.31 ha for 1B. The project will be located on a number of private properties, involving over 40 landowners; 5 turbine landholders(1A), 3 turbine landholders (1B) and 15 landholders (Overhead line; 2 of whom are also receiving turbines as part of 1B). The disturbance footprint has been calculated by applying a 21m buffer to the infrastructure layout and is approximately224.38 ha for 1A and 236.83 ha for 1B.
Development envelope	The area of the project site in which the wind farm infrastructure (turbines, hardstands, access roads, electrical cables and substation) could potentially be sited.
Development footprint	The final locations of the wind farm infrastructure. This includes the infrastructure footprint - the area occupied by WTGs, access tracks, substation etc. during the operational phase - and other areas that will be affected by construction (for example, cable trench easements, construction phase access track width, construction compound, crane pads) which can be rehabilitated post-construction.
Construction area	The part of the installation area located at each WTG foundation position which is required for assembling the cranes and area for operating cranes, containers for lifting equipment, generator unit, working area with tools and containers etc.
Construction, Batching plant x2 and Maintenance compounds	These compounds are temporary facilities to support the construction phase, each covering an area of up to approximately 200m x 150m. They will house monitoring and communications equipment, offices, staff amenities, carpark, workshop, laydown/storage area, batching plants and ancillary equipment. Sanitary facilities will be included as part of these compounds, including maintenance facility; cleaning storage facility; toilet/block facility; toilet block waste plumbed to treatment system; aboveground 'septic' treatment system; potable water tank; appropriate storage area for all domestic waste types. Access to the main project compounds will be via Porter Lagoon and Springbank Road. Access to compounds in the vicinity of the overhead transmission line will be accessed via the local road network. The compounds will be enclosed to restrict unauthorised access.

Component	Description
	These facilities will be rehabilitated if they are not required for the operation stage of this project.
Assembly area	Areas on site where rotor blades are attached to the hubs prior to the installation of the complete rotor to the nacelle. The area is only relevant for the rotor assembly installation method.
Substation and Operation and Maintenance compound	One collector substation and operation and maintenance compound will be established as permanent facilities. The transformers will be placed on concrete pads with protective bunding to contain any leak or spill of transformer oil. Electrical infrastructure within the substation compounds will be founded on concrete slabs with gravel surrounds. A permanent wind farm operational fenced compound area of approximately 200m x 400m will be required and will include a site office, monitoring and communications equipment, control switch room, staff amenities, Access to this compound will be from Koonoona Road.
Access tracks	These provide access around the site and a connection to public roads. For the construction phase access roads will be up-to 10m wide to accommodate construction activities and cranes. They will be designed to be of acceptable gradient for South Australian Country Fire Service (CFS) vehicles. Following construction these tracks would be rehabilitated and reduced to the minimum widths requested by the CFS. Stormwater drainage and batters will be included where required. Drainage will include open swale drains of between 1-3 m wide and will be constructed next to access tracks. Batter slopes of 1-5 m may be required.
Micro-siting	Approval has been granted to accommodate micro-siting for all project infrastructure. The micro-siting process will be undertaken primarily to minimise site impacts on environmental assets. The head contractor will work with specialist advisors to undertake the micro-siting process and develop the final site designs.
Nacelle	The housing for generating components of the wind turbine generator (WTG). This includes the generator, gear box, drive train and brake assembly.
Turbine footing	Footings may be either a mass concrete footing (raft style), pile-type rock anchors, or a combination of both, and up to 26m in diameter, the vast majority of which would be buried.
Hardstands	A number of permanent and temporary hardstand areas will be required. These are improved/stabilized areas with a prepared surface where plant and cranes can operate, vehicles can be parked, and material can be stored. Each WTG will have a crane hardstand area of 50m x 30m to support crane operations during the erection of the towers and wind turbine components. These will also be used for scheduled maintenance activities during the wind farm operational and decommissioning phases. The hardstand configuration at each WTG site will be based on either the triangular or rectangular hardstand methods, which will be determined by the topography and terrain.
Wind Turbine Generator	Wind turbines are manufactured in separate components and sections and will be assembled on the site. The 75 WTGs (38 and 37 at 1A and 1B respectively) will have a maximum hub height of 121m, a maximum blade length of 78m and an overall maximum height (tip height) of 199m with

Component	Description
	nameplate capacities of 209 (1A) and 203.5MW (1B). Blades will have non-reflective coatings. (Meeting DNF conditions 2 and 3). Setbacks • A turbine setback of 5.3km from Burra town centre. • A minimum distance of 3km between turbines and the Burra Creek Campground • Unless otherwise agreed with the landowner, a minimum distance of 2km between turbines and occupied dwellings • A minimum 50m setback from water courses (including drainage lines) for concreate batch plants Turbine erection commences with the initial tower section bolted to a stub section embedded within the concrete footing. Subsequent sections are raised by crane and bolted to the section below. The nacelle is then lifted to the top of the tower and secured, followed by fixing the rotor and the individual blades. Once the turbine is constructed, it is subjected to a detailed checking process as part of its commissioning before it can commence unrestricted operation.
Underground cabling	All electrical and transmission cabling to and from each WTG shall be placed underground. (*Meeting DNF condition 18*). Underground cabling (33kV) will connect the WTGs to the substation. Underground cabling and communications (fibre) will generally be located adjacent to access tracks. It will be installed via trenching, approximately 500mm wide per circuit and approximately 1.2m deep, with 900mm coverage over the top of the cables. However, the impact width during installation will be at least 10 m for single cables, plus 2m for each additional cable.
Transmission lines	A 32 km transmission line will be installed. All new power poles/transmission poles and or lattice towers shall be located on private property where possible. When over arterial roads a minimum vertical clearance of 8 m will be allowed. Transmission poles shall not be installed within road reserves without consultation with DIT
Meteorological masts	Permanent wind monitoring masts will be installed within the development footprint to monitor the performance of the wind turbines against the manufacturer's power-generation guarantees. These shall be marked with aviation orange / white stripes, and if guy-wired, equipped with high-visibility cable balls on the outer guy wires. In addition, such towers must be equipped with 5 m high-visibility sleeves, one for each anchor mechanism and each outer guy wire. Each marking mechanism shall be maintained to ensure their visibility and attachments to the wires are maintained. *(Meeting DNF conditions 5)*. The wind monitoring masts are considered to be tall structures and will be reported to the Vertical Obstacle Database (VOD) managed by Airservices Australia.
Stormwater drainage	Stormwater drainage and batters will be included where required. Drainage will include open swale drains of between 1-3 m wide.
Rehabilitation	Site rehabilitation will be an ongoing process to stabilise and restore areas that will not be subject to ongoing impacts.

Component	Description
Decommissioning of Temporary Facilities	Temporary construction facilities that are not required for operational activities of the wind farm will be removed during the construction process and on completion of construction activities and the areas rehabilitated in accordance with the Rehabilitation Plan (Appendix H).

2.4 Work Stages

Work activities on site are as per the GWF Schedule Appendix C. Construction will follow 3 broad stages with a staggered start for 1A and 1B. Development B will commence around one month prior to 1A. The stages of project implementation are provided in Tables 2 and 3. If a stage of wind or solar reaches financial close separately, the development and build schedule would need to be customised accordingly.

Table 2: The broad stages of activity for GWF Stage 1 development.

Item	Date
Site Establishment and preliminary works	***November 2021-October 2022***
Geotechnical assessment	November 2021 – March 2022
Design development	August 2021 – March 2022
Approvals and Licensing	August 2021 – March 2022
Met Masts	November 2021-July 2023
Procurement	April-May 2022
Mobilisation on site and site office establishment	***December 2021 – March 2022***
Bench preparation	March 2022- April 2022
Driveway Access	March 2022 – April 2022
Site office and facilities established	April 2022- May 2022
Construction compound established	March 2022
Batching plant, installation, test and commission	May 2022- October 2022
Upgrade site entry points	December 2021- January 2022
Civil Works	***May 2022 – July 2023***
Transport route roads and intersection upgrades	February 2022- September 2022
Roads and platforms established	March 2022- August 2022
Hardstands and footings (Micro siting)	August 2022-September 2023
Wind Turbine Generators	April 2023- April 2024
Electrical Services	November 2022- April 2024
Testing and commissioning	May 2023- April 2024

Table 3: Stages of Project Implementation - Construction.

TIMING	2021	2022				2023				2024			
ACTIVITY	**Nov-Dec**	**Jan-Mar**	**Apr-Jun**	**Jul-Sep**	**Oct-Dec**	**Jan-Mar**	**Apr-Jun**	**Jul-Sep**	**Oct-Dec**	**Jan-Mar**	**Apr-Jun**	**Jul-Sep**	**Oct-Dec**
Local road upgrades													
Site mobilisation													
Road's construction													
Construct compound													
Hardstands & foundations													
Install cabling													
Deliver turbine components													
Erect towers													
Demobilise site													
Implement revegetation													

3 ENVIRONMENTAL MANAGEMENT SYSTEM

Managing environmental issues and promoting environmental awareness during the site works is an essential component of responsible project management. It requires the active consideration of environmental issues and health and safety as a prerequisite to all construction operations. Environmental management during construction of the GWF Stage 1 will be governed by the Environmental Management System (EMS) outlined in this CEMP.

This CEMP applies to all personnel (staff and sub-contractors) and activities associated with the construction of the GWF Stage 1. GLC is responsible for implementation of the CEMP (see Section 5 Roles and Responsibilities). They shall ensure that all personnel are inducted such that they understand their environmental responsibilities as defined by the EMS in this CEMP and as legislated by the *Environmental Protection Act* 1993. Environmental duties of all personnel include the following:

> ***General Environmental Duty*** *– whereby a person in the performance of their duties shall not do so in a manner which will cause, or is likely to cause, environmental harm unless the person takes all reasonable and practical measures to prevent or minimise the harm.*
>
> ***Duty to Notify Environmental Harm*** *– whereby if a person in the performance of their duties becomes aware that serious or material environmental harm is caused or threatened, then the person must immediately report through the appropriate channels.*

This section presents Elecnor's (a member of the GLC consortium) Environmental Policy and the structure of the Environmental Management System that will govern the construction of GWF Stage 1.

3.1 Environmental Policy

All staff and contractors are expected to abide by Elecnor's Integrated Environmental Management, Quality Management, Health and Safety Management, Energy Management, Research, Development and Innovation (RDI) Management and Information Security Policy while working on the project site. A summary of this Policy is presented in Figure 4. Elecnor satisfies applicable legal and voluntary requirements and ensures transparency in Quality, Environmental, Health and Safety performance through disclosure of the policy on the company website. (*https://www.elecnor.com/integrated-management-system).*

Elecnor has established the principles to which it is committed, and which should govern how the whole organisation operates regarding Environment, Quality Management, Health and Safety Management, Energy, RDI and Information Security, so that they serve as a reference to define and revise objectives that continuously improve the effectiveness of the management systems.

These principles are as follows:

- Strict compliance with current applicable legislation and other requirements that Elecnor observes in all the markets in which it operates.
- Customer satisfaction.
- Prevention of damage to and deterioration of the Group's employees' health, by improving their working conditions in order to increase the level of protection of their health and safety.
- Prevention of pollution.
- Efficient energy use and consumption.
- Creation of a positive impact of its activities on the social environment.
- Improvement of competitiveness through RDI.
- Effective and efficient protection through a focus on information use that is preventive, perceptive, responsive and dynamic.

Figure 4: Summary of Elecnor's Integrated Environmental Management Policy General Principles

Elecnor will live up to this policy by:

Health and Safety

- Supplying the material resources to contribute to health and safety.
- Having an emphasis on training in prevention techniques.
- Developing awareness campaigns for the entire organisation.
- Conducting ongoing site inspections and audits and adoption of suitable corrective measures in order to correct the origin of the deficiencies.

Quality

- Starting with an understanding of the customers' real expectations when it comes to designing and supplying products and services.
- Development of the mentality of continuous improvement at all levels of the organisation, excluding conformism, lack of rigour and other attitudes which represent a barrier to this principle.
- Involvement of each member of staff in the Quality challenge, so that they all take on a sincere personal commitment to customer service.

Environment

- Incorporation of the environmental aspect into the decision-making processes regarding investments and the planning and realisation of activities, by fostering consideration of this aspect in cost-benefit analyses.
- Promotion of the protection, conservation, and sustainable use of the natural environment (air, water, soil, flora, fauna and landscape) through the adoption of specific preventive, palliative and compensatory measures, aimed at the prevention or the restoration of zones which may be affected by the organisation's activities.
- Responsible and efficient management of water resources, by looking after every aspect of the full cycle, supporting social development and the conservation of ecosystems.
- Involvement of all of its interest groups (employees, shareholders, customers, suppliers and society in general) in the joint search for useful solutions to the challenge of conserving and developing the environment and the sustainable use of natural resources.

3.2 GWF Environmental Management System Structure

GLC will embrace Elecnor's Environment Policy. This will be implemented through a structured, project specific, Environmental Management System (EMS) tailored for the GWF Stage 1 development. This system will be driven by the regulatory requirements, developers' commitments and legislation relevant to the project. Figure 5 presents the EMS structure with the activities that drive each of these components defined through the CEMP.

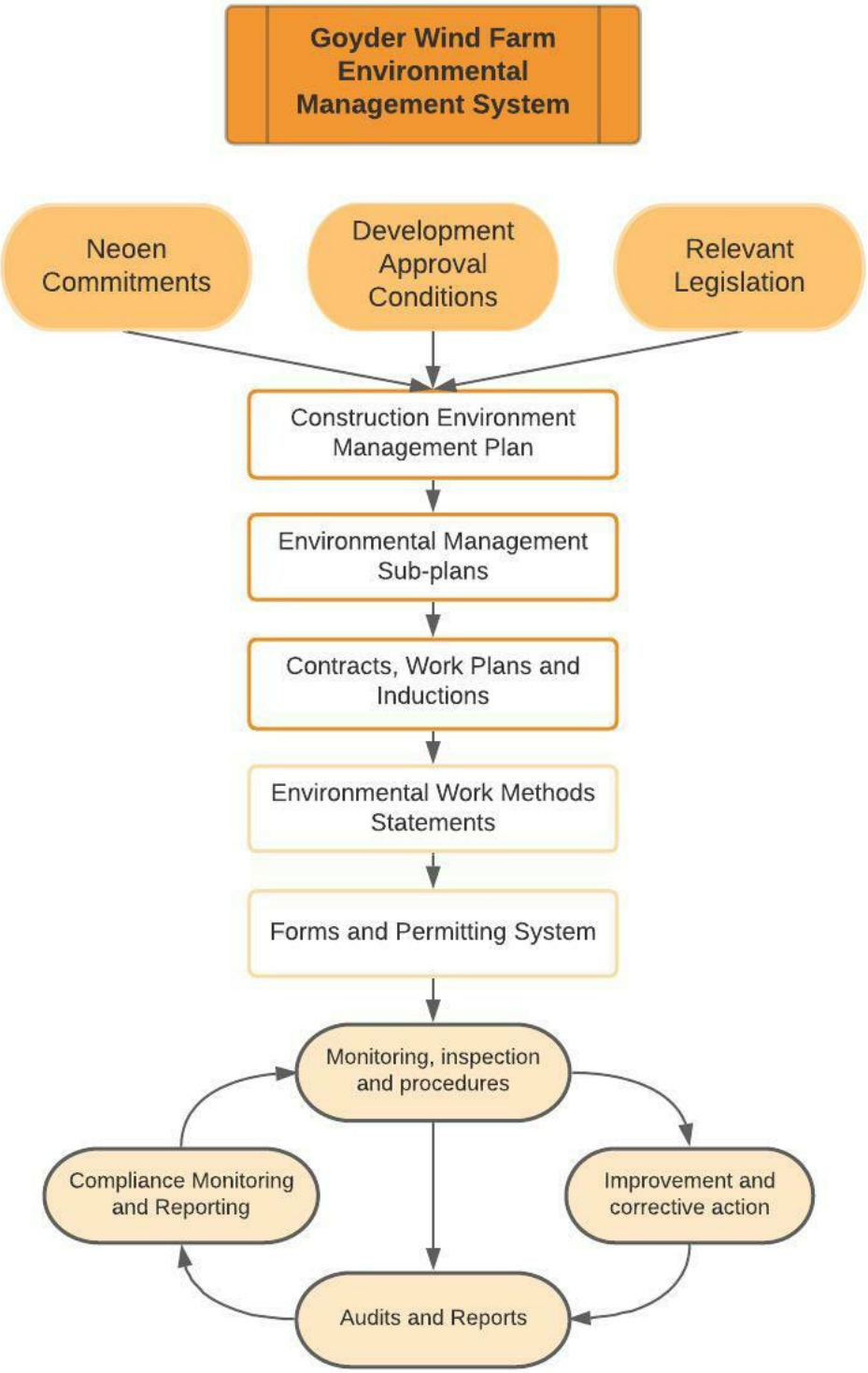

Figure 5: The Goyder Wind Farm Environmental Management System Structure

4 PROJECT COMMITMENTS AND REGULATORY REQUIREMENTS

4.1 Regulatory Requirements

The construction and operation of the GWF Stage 1, and the preparation of this CEMP, is guided by a framework of legislation, standards, approval conditions and development commitments that have been applied to the project. This framework will also form the basis for ongoing decision-making and complaint resolution in respect of the CEMP. A summary of the legislation and standards is listed in Table 4 below.

Table 4: Legislation and standards used to inform the CEMP.

Element	Legislative and other requirements
Construction – general	*Environment Protection Act 1993 (SA)* *Work Health and Safety Act 2012 (SA)* *Work Health and Safety Regulations 2012 (SA)* *Planning Development and Infrastructure Act 2016 (SA)*
Construction - wind	*Electricity Act 1996 (SA)* *Green Industries SA Act 2004 (SA)*
Noise and Vibration	*Environment Protection Act 1993 (EPA Act) (SA)* *Environment Protection (Noise) Policy 2007 (SA)*
Air Quality	*Environment Protection Act 1993 (EPA Act) (SA)* *Environment Protection (Air Quality) Policy 2016 (SA)* *National Environment Protection (Ambient Air Quality) Measure 2003 (Cwth)* *National Environment Protection (Diesel Vehicle Emissions) Measure 2001 (Cwth)* *Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 (Cwth)*
Water Quality	*Environment Protection Act 1993 (EPA Act) (SA)* *Environment Protection (Water Quality) Policy 2015 (SA)* *Landscape South Australia Act 2019 (SA)* *Landscape South Australia Regulations 2020 (SA)*
Erosion and Sedimentation Control	*Environment Protection Act 1993 (EPA Act) (SA)* *Best Practice Erosion & Sediment Control. International Erosion Control Association (IECA) Australasia Chapter (2008) – Book 1*
Contaminated Land	*Environment Protection Act 1993 (EPA Act) (SA)* *Environment Protection Regulations 2009 (SA)* *National Environment Protection (Assessment of Site Contamination) Measure 1999 (Cwth)*

Element	Legislative and other requirements
Storage and Handling of Dangerous Goods	*Dangerous Substances Act 1979 (SA)* *Dangerous Substances (General) Regulations 2017 (SA)*
Transport of Dangerous Goods	*Dangerous Substances Act 1979 (SA)* *Dangerous Substances (Dangerous Goods Transport) Regulations 2017 (SA)* *Australian Code for Transport of Dangerous Goods by Road and Rail (Ed 7.7)*
Waste Management	*Environment Protection Act 1993 (EPA Act) (SA)* *Environment Protection (Waste to Resources) Policy 2010 (SA)* *South Australian Public Health (Wastewater Regulations) 2013 (SA)*
Flora and Fauna	*Environment Protection and Biodiversity Conservation Act 1999 (Cwth)* *Biosecurity Act 2015 (Cwth)* *Landscape South Australian Act 2019 (SA)* *Landscape South Australia Regulations 2020 (SA)* *National Parks and Wildlife Act 1972 (SA)* *Native Vegetation Act 1991 (SA)* *National Parks and Wildlife Act Regulations 2019 (SA)* *Native Vegetation Act 1991 (SA)* *Native Vegetation Regulations 2017 (SA)*
Cultural Heritage	*Aboriginal and Torres Strait Islander Heritage Protection Act 1984 - Amended 2016 (Cwth)* *Native Title Act 1993 (Cwth)* *Aboriginal Heritage Act 1988 (AH Act) – Amended 2016 (SA)* *Heritage Places Act 1993 (SA)*
Land Use	*Planning Development & Infrastructure Act 2016 (SA)* *Local Government Act 1999 (SA)* *Heritage Places Act 1993 (SA)*
Fire Management	*Fire and Emergency Services Act 2005 (SA)* *SA State Bushfire Management Plan 2021-2025* *SA State Emergency Management Plan – Part 2 Arrangements 2018* *Flinders Mid-North Yorke Bushfire Management Area Plan 2017*

4.2 Conditions of Approval and Project Commitments

Key regulatory approvals have been achieved for the Project, and conditions of approval have been issued. Further, Neoen has made several management commitments in the Development Application. Together these form the framework for management and mitigation actions presented in this CEMP.

Conditions of consent and project management commitments include:

- Conditions defined by Crown Development Decision Notification Form (DNF 422/V009/20) – see Table 5, Appendix A
- Conditions set out in the Environmental Protection and Biodiversity Conservation approval for Stage 1A and 1B (EPBC 2021/8958), granted by Department of Climate Change, Energy, the Environment and Water (the Department) – see Table 6 and Appendix Q. Note: Approval Conditions for Common Assets (i.e. overhead transmission line and substation) to be incorporated once received.
- Conditions set out in the Native Vegetation Clearance approval (NVC 2021/3219/422, NVC 2021/3230/422 and NVC 2021/3231/422) – see Table 7 and Appendix R
- Commitments made by Neoen Australia in their Development Application – see Table 8 and Appendix A.

A number of other approvals, licensing and permits are required for the successful progress of this project. These are presented in Section 4.3.

Table 5: Conditions described by Ministerial Delegation on the Goyder South Project taken from DNF422/VOO(/20 R1. A reference, description, timing and where requirements are addressed.

Reference	Condition	Timing	Where requirements are addressed
2. (p. 2)	No wind turbine shall exceed a maximum height (from ground level to tip height) of 240 metres, with the maximum number of installed turbines being 163.	Pre-construction Construction	CEMP 2.3 Construction details
3. (p. 2)	The total installed generating capacity of the windfarm development shall not exceed 1200 Megawatts (MW) and no individual turbine shall exceed 8 Megawatts (MW).	Pre-construction Construction	CEMP 2.3 Construction details
4. (p. 2)	Solar panels and associated equipment (excepting underground cable connections) shall be set back a minimum distance of 30 metres from all site boundaries.	N/A	This component will be addressed in the relevant Solar Farm CEMP
5. (p. 3)	Any meteorological masts shall be suitably marked with appropriate aviation orange / white stripes, and if guy-wired, equipped with high-visibility cable balls on the outer guy wires. In addition, such towers must be equipped with 16-foot- *(5m)* high-visibility sleeves, one for each anchor mechanism and each outer guy wire. Each marking mechanism shall be maintained to ensure their visibility and attachments to the wires are maintained.	Pre-construction Construction	CEMP 2.3 Construction details

Reference	Condition	Timing	Where requirements are addressed
6. (p. 3)	Prior to commencement of site works, final detailed plans shall be submitted to the reasonable satisfaction of the Minister of Planning and Local Government.	Pre-construction	Design Plans Issued for Construction
7. (p. 3)	Following the completion of construction works, tracks and disturbed areas (excluding those used for ongoing access and maintenance) must be rehabilitated and bare areas re-vegetated as soon as possible, taking advantage of natural rainfall. If bare areas are still present at the end of spring, they must be temporarily protected and stabilised by geotextile matting or other suitable methods, until they can be effectively re-vegetated.	Construction *and* Post Construction	Rehabilitation Management Plan (Appendix H) Site Rehabilitation CEMP 7.8
8. (p. 3)	The wind farm shall be designed and operated in a manner so as not to interfere with existing telecommunication facilities or communication equipment. This shall be confirmed by post-operational monitoring to be conducted by a qualified consultant within six months of wind farm commissioning including any sources of High Frequency (HF) noise that could impact on communication equipment. If post-operational monitoring confirms a diminution of or interruption to pre-development service levels, the implementation of any on or off-site mitigation measures for affected receivers shall be at the cost of the developer.	Pre-construction Post Construction	Design Plans Issued for Construction Electromagnetic Interference in CEMP 7.16 Post-construction HF Noise Assessment
9 (p. 4)	A Construction Environmental Management Plan (CEMP) shall be provided. Construction of the development must be in accordance with the approved CEMP, which as a minimum shall include specific management measures for the following aspects: noise and vibration; air quality and dust; native flora and fauna; Aboriginal and European heritage; weeds and pests; traffic and access; erosion and stormwater management; site rehabilitation (post construction); storage and handling of hazardous substances; water quality; fire risk; contamination; public safety; emergency response planning; complaints handling and management.	Prior to the commencement of site works.	This CEMP in section 7.
9 (p.4)	The CEMP shall include the following sub-plans: Dust Management Plan; Construction Soil Erosion and Drainage Management Plan; Stormwater Management Plan; Waste Management Plan; Rehabilitation Management Plan (post construction).	Prior to the commencement of site works.	Sub-plans as appendices to the CEMP and described in section 8.

Reference	Condition	Timing	Where requirements are addressed
10 (p.4)	A Fire and Emergency Management Plan prepared in consultation with the SA Country Fire Service (CFS) and Safe Work SA. Construction and operation development must be in accordance with the approved plan and include specific management measures or plans for at least the following aspects: emergency response procedures; emergency vehicle access; fire-fighting equipment and water supply; vegetation management; training for employees, contractors and local CFS volunteers.	Prior to the commencement of construction.	This CEMP in 7.11 Fire and Emergency Management Plan (Appendix I)
11 (p. 5)	A Stormwater Management Plan for the solar farm.	N/A	This component will be addressed in the relevant Solar Farm CEMP NOTE – commitment 9 requires the SMP for the full project: CEMP in 7.7 and (Appendix F)
12 (p. 5)	A detailed Landscaping and Revegetation Plan. The plan shall address targeted landscaping around the solar farms and all buildings/structures (except wind turbines) to mitigate visual impact where practicable. The plan shall identify species to be planted, planting density, planting medium depths, irrigation methods, fencing and other features of the landscaping scheme to demonstrate viability of all plantings. The plan shall be reflected as necessary in all other relevant plans and drawings.	Prior to the commencement of site works.	This CEMP in 7.8 & 7.15 This will be integrated into the: Rehabilitation Management Plan (Appendix H)
13 (p. 5)	An Operational Environmental Management Plan (OEMP) will be prepared. Operation of the development must be in accordance with the approved OEMP, which as a minimum shall include specific management measures for the following aspects: noise and vibration; air quality and dust; native flora and fauna (including ongoing monitoring and mitigation protocol for raptor and other bird species); revegetated areas, Aboriginal and European heritage; weeds and pests; traffic and access; erosion and stormwater management; site rehabilitation (post construction); waste management, storage and handling of hazardous substances; water quality; fire risk; contamination; public safety; emergency response planning; complaints management. Including an on-going monitoring and mitigation protocol in respect to raptor and other bird species that may be impacted by the development.	Prior to the commencement of commercial operations.	OEMP (Appendix K)

Reference	Condition	Timing	Where requirements are addressed
14 (p. 5-6)	A Draft Decommissioning Rehabilitation Plan for each stage of the development that outlines end-of-project decommissioning works (i.e., describing the extent of reinstatement and restoration activities upon the removal of wind turbines, solar arrays and associated facilities).	Prior to decommissioning of each project element.	Draft Decommissioning Rehabilitation Plan (Appendix L)
15 (p. 6)	Final Decommissioning Rehabilitation Plan (based on current best practices at the time prior to decommissioning).	Six (6) months prior to commercial operation.	Final Decommissioning Rehabilitation Plan
16 (p. 6)	The final design of all buildings and associated structures should have exterior colours and finishes in non-reflective, neutral colours that complement the surrounding rural landscape. The exposed footings of transportable buildings shall be enclosed around the perimeter of the buildings with brickwork or timber, to give the appearance of a permanent structure, other than where such buildings are temporary construction buildings, or such an enclosure is inconsistent with safety requirements.	Prior to the commencement of construction.	Design Plans Issued for Construction Visual Amenity Measures in CEMP 7.15
17 (p. 6)	All state agency or utility-maintained infrastructure (i.e., roads, kerbs, drains, crossovers, cabling, pipe work etc) that are demolished altered, removed or damaged during construction of the project shall be reinstated to state agency or utility specifications. All costs associated with these works shall be met by the developer.	Prior to commencement of construction works Following the completion of construction works.	Austroads Guides, Australian Standards Department for Infrastructure and Transport (DIT) technical standards. Design Plans Issued for Construction Traffic Access and Infrastructure in CEMP 7.6
18 (p.6)	All electrical and transmission cabling to and from each wind turbine generator and solar array shall be placed underground.	Prior to the commencement of construction.	CEMP 2.3 Construction details Design Plans Issued for Construction Visual Amenity Measures in CEMP 7.15
19 (p. 6)	Any imported substrate or engineered fill shall be free of weeds or pathogens.	Prior to the commencement of construction.	Flora and Fauna Management Plan (Appendix O)

Reference	Condition	Timing	Where requirements are addressed
			Weeds and Pests in CEMP 7.5
20 (p. 6)	There shall be no on-site burial of waste materials	Prior to the commencement of construction.	Waste Management Plan (Appendix G) Storage and Handling of Waste and Hazardous Substances in CEMP 7.9
21 (p. 6)	Fuels, chemicals, lubricants and any other dangerous/hazardous materials likely to cause environmental harm must be contained in an appropriately bunded containment system.	Prior to the commencement of construction Operation	Waste Management Plan (Appendix G) Storage and Handling of Waste and Hazardous Substances in CEMP 7.9
22 (p. 7)	All external lighting on the site (excluding navigational warning lights) shall be designed and constructed to conform to Australian Standard (AS 4282-2019).	Prior to the commencement of construction. Operation	Design Plans Issued for Construction Visual Amenity in CEMP 7.15
23 (p.7)	No additional signs shall be displayed upon the subject land other than those identifying windfarm access points and those shown on the approved plans. If any further signs are required, these shall be the subject of a separate application.	Prior to the commencement of construction. Operation	Design Plans Issued for Construction Visual Amenity in CEMP 7.15 Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6
24 (p. 7)	Clearance of or damage to native vegetation on the site or adjacent public roads for access during construction shall be minimised.	Prior to the commencement of construction. Operation	Flora and Fauna Management Plan (Appendix O) Flora and Fauna in CEMP 7.3 Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6
25 (p. 7) EPA	Noise levels at the noise sensitive receivers in the vicinity of the wind farm development must meet the noise requirements of the Environment Protection Authority's *Wind Farms Environmental Noise Guidelines 2009.* The	Construction Operation	Construction Noise and Vibration Management Plan (Appendix M)

Reference	Condition	Timing	Where requirements are addressed
	noise levels at the relevant receivers must not exceed the greater of: a) 35dB if receivers are situated in the Rural Living Zone, or; b) 40dB if receivers are situated in a Primary Production Zone or zones other than the Rural Living Zone, or; c) The background noise by more than 5dB when assessed against provisions of the EPA's *Wind Farms Environmental Noise Guidelines 2009.*		Noise and Vibration in CEMP 7.1
26 (p. 7) EPA	A final pre-construction noise assessment must be submitted which confirms compliance with the operational criteria based on the final wind turbine generator selection, layout and warranted sound power levels. The warranted sound power levels must be measured and reported in accordance with *IEC61400-11 (Ed 3.0) Wind turbines – Part 11: Acoustic noise measurement techniques.* The final report must be submitted having consulted with the EPA.	Prior to the commencement of construction in each stage of the project.	Staged Pre-construction Noise Assessments Construction Noise and Vibration Management Plan (Appendix M) Noise and Vibration in CEMP 7.1
27 (p. 7-8) EPA	Noise emitted by the selected wind turbine generators intended for installation must not include tones audible at the noise receivers when tested in accordance with the tonality test procedure defined in *IEC61400-11 (Ed 3.0) Wind turbines – Part 11: Acoustic noise measurement techniques* or a methodology of tones assessment otherwise agreed with the EPA. The absence of tones must be verified by results of post-construction at locality (Receiver H4) as shown in the Acoustic Report (June 2020) or such other localities to the satisfaction of the EPA.	Following the completion of construction and within three (3) months of the commencement of operations.	Post-construction Noise Assessment Construction Noise and Vibration Management Plan (Appendix M) Noise and Vibration in CEMP 7.1 OEMP (Appendix K)
28 (p. 8) EPA	An independent acoustical consultancy (other than the company that prepared the predictive acoustical report) must monitor noise levels at six localities at least – H4, H26, H37, H57, H61 and H126 as shown in the Acoustic Report (June 2020) or such other localities agreed to by the Minister having consulted with the EPA. Monitoring must be undertaken in accordance with the EPA's *Wind Farms Environmental Noise Guidelines 2009* with all of the noise sources associated with each stage the wind farm in full operating mode. The Minister must confirm their satisfaction of post construction having consulted with the EPA.	Following the completion of construction and within three (3) months of the commencement of operations.	Operational Noise Monitoring Report Construction Noise and Vibration Management Plan (Appendix M) Noise and Vibration in CEMP 7.1 OEMP (Appendix K)
29 (p. 8) EPA	If the post-construction noise monitoring results reveal non-compliance with the specified noise criteria the proponent must arrange for the noise monitoring of other relevant noise sensitive receivers. The measures to ensure compliance with the specified noise criteria must	Prior to the commencement of operations.	Construction Noise and Vibration Management Plan (Appendix M) Noise and Vibration in CEMP 7.1

Reference	Condition	Timing	Where requirements are addressed
	be undertaken by the proponent for all of the localities where non-compliance with the noise criteria is revealed.		OEMP (Appendix K)
30 (p. 8-9) DIT	Traffic Management Plan (TMP) prepared in consultation with the Department of Infrastructure and Transport (DIT) and the Goyder Regional Council. As part of the TMP the applicant shall engage an accredited Road Safety Auditor to undertake a safety audit of the route to be used by vehicles servicing the development. The TMP shall address matters including, but not limited to: a) definition of routes, roads and access points to be used for vehicles during construction and for ongoing maintenance purposes, particularly with regard to the transport of over-dimensional wind farm components; b) the types and number of vehicles servicing the development, including the construction traffic peaks; c) a route risk assessment for roads (including junctions/intersections) and identification of upgrade of roads and junctions/intersections required to safely accommodate all vehicles servicing the development; d) any structural improvements) e.g. bridge/culvert improvements); e) a management schedule for the construction stage of the development to minimise impact on road	Prior to the commencement of construction.	Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6
31 (p. 9)	Access to serve the development shall be undertaken in accordance with Jacobs Goyder South - Traffic Impact Assessment, Figure 6-3: Site Access Points to Goyder South. The access points identified on this Figure (including T1 to T5 and D1) will require upgrade and all road works (e.g. turn treatments, line marking alterations, modification to regulatory signage, pavement sealing, etc) at each location must be designed and constructed to comply with Austroads Guides, Australian Standards and to the satisfaction of Department for Infrastructure and Transport (DIT).	During construction and operation	Goyder South - Traffic Impact Assessment (Jacobs 2020) Austroads Guides, Australian Standards and to the satisfaction of Department for Infrastructure and Transport (DIT). Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6
32 (p. 9)	Any road works on arterial roads (including, but not limited to Worlds End Highway, Goyder Highway and Barrier Highway) required to facilitate the development (including, but not limited to, project management and any necessary road drainage upgrades) shall be borne by the developer. The developer shall enter into a Developer Agreement with DIT regarding these works and shall contact DIT's Road Assets - Concept Planner, Mr	During construction	Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6

Reference	Condition	Timing	Where requirements are addressed
	Bonaventure Tan (08) 8648 5243, mobile 0417 767 452 or via email bonaventure.tan@sa.gov.au to discuss any technical issues regarding the required works.		
33 (p. 9)	The concrete batching and individual construction compound/s required to facilitate each stage of the development shall gain access to the arterial road network at locations deemed suitable by DIT. Any upgrades to facilitate safe access shall be undertaken to DIT standards and requirements with all costs borne by the developer.	During construction	Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6
34 (p. 9)	Any infrastructure within the road reserve that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the developer.	During construction	Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6
35 (p. 9)	Any glare issues affecting the arterial road network shall be mitigated to the satisfaction of the Commissioner of Highways.	During and Following Construction	Traffic Management Plan (Appendix N) Traffic Access and Infrastructure in CEMP 7.6
36 (p. 9)	All power lines over arterial roads shall provide a minimum vertical clearance of 7.5 *(8)* metres. Transmission poles shall not be installed within road reserves without consultation with DIT.	Design Prior to the commencement of construction.	Design Plans Issued for Construction CEMP 2.3 Design details Traffic Access and Infrastructure in CEMP 7.6
37 (p. 9)	All new power poles/transmission poles shall be located on private property where possible.	During construction	Design Plans Issued for Construction CEMP 2.3 Design details Traffic Access and Infrastructure in CEMP 7.6
38 (p. 9)	Any undergrounding of the transmission line across the Goyder Highway, Worlds End Highway and the Barrier Highway shall be undertaken to the requirements and satisfaction of the Commissioner of Highways.	During construction	Design Plans Issued for Construction CEMP 2.3 Design details Traffic Access and Infrastructure in CEMP 7.6
39 (p. 9)	A final transmission line diagram shall be provided for each stage of the development with any new crossings/borings on, adjacent to, or under the arterial	During construction	Design Plans Issued for Construction

Reference	Condition	Timing	Where requirements are addressed
	road network designed and constructed in consultation with DIT.		Traffic Access and Infrastructure in CEMP 7.6
40 (p. 9)	The developer shall ensure that all stormwater generated by the proposal and associated road upgrades is appropriately collected and disposed of without entering or jeopardising the safety of the adjacent arterial road network.	During and Following Construction	Design Plans Issued for Construction CEMP 2.3 Design details Stormwater Management Plan (Appendix F)
41 (p. 9)	No stormwater from this development shall be permitted to discharge on-surface to the adjacent roads. In addition, any existing drainage of the adjacent roads shall be accommodated in the development and any alterations to road drainage infrastructure as a result of this development are to be at the expense of the developer.	During and Following Construction	Design Plans Issued for Construction CEMP 2.3 Design details Stormwater Management Plan (Appendix F)

Table 6: Conditions of EPBC approval for Stage 1A – conditions summary reference table – Full condition notification document presented in Appendix Q. Note: approval conditions for the Common Assets will be incorporated once received.

Reference	Condition	Timing	Where Requirement is being addressed
1.	To minimise impacts to protected matters, the approval holder must not: a. construct more than 38 (Stage 1A) and 37 (Stage 1B) wind turbine generators within the project area; b. clear outside the project area; c. clear more than 8.04 ha (Stage 1A) and 2.61 ha (Stage 1B) of Pygmy Blue-tongue Lizard (PBTL, *Tiliqua adelaidensis*) habitat; d. clear more than 18 individual plants of Trailing Hop-bush (*Dodonaea procumbens*) in Stage 1A and none in Stage 1B; e. clear more than 12.67ha of the Iron-grass Natural Temperate Grassland (INTG) Threatened Ecological Community (TEC) in stage 1A and none in Stage 1B.	Construction	Design Plans issued for Construction Flora and Fauna Management Plan (Appendix O) PBTL Management Plan INTG TEC Management Plan
2.	To minimise impacts to protected matters during the construction and operation of the wind farm, the approval holder must implement the Construction Environmental Management Plan (CEMP) as required under condition 9 of the SA development approval.	Construction and Operation	This CEMP
3.	For the protection of the Pygmy Blue-tongue Lizard, the approval holder must implement the PBTL Management Plan for the duration of this approval.	Construction and Operation	Flora and Fauna Management Plan **(Appendix O)** PBTL Management Plan
4.(Stage 1A)	For the protection of the Iron-grass Natural Temperate Grassland of South Australia TEC, the approval holder must implement the INTG TEC Management Plan for the duration of this approval	Construction and Operation	Flora and Fauna Management Plan **(Appendix O)** INTG TEC Management Plan
5.(Stage 1A) 4.(Stage 1B)	The approval holder must submit a Bird Adaptive Management Plan (BAMP) to the Department for the Minister's approval within 12 months of the date of this approval [BAMP inclusions listed in full decision notification, Appendix Q].	Construction (before Operation commences)	This CEMP Bird Adaptive Management Plan (to be developed by a qualified consultant engaged by Neoen)

Reference	Condition	Timing	Where Requirement is being addressed
6.(Stage 1A) 5.(Staged 1B).	The approval holder must submit an Offset Management Plan (OMP) to the Department for the Minister's approval within 6 months of the date of this approval [OMP inclusions listed in full decision notification, Appendix Q].	Construction	This CEMP Offset Management Plan (OMP) (to be developed by Neoen)
7.(Stage 1A) 6.(Staged 1B).	If the OMP (required under Condition 6) has not been approved by the Minister in writing within 18 months of the date of this approval, and the Minister notifies the approval holder that the submitted OMP is not suitable for approval, the Minister may, at least 2 months after so notifying the approval holder, approve a version of the OMP revised by the Department	Construction and/or Operation	This CEMP
8.(Stage 1A) 7.(Staged 1B).	The approval holder must provide written evidence to the Department that the offset site(s) required under the approved OMP has/have been acquired and secured within 24 months of commencement of the action. The written evidence must identify the legal securing mechanism by which each offset site will be permanently protected for conservation	Construction or Operation	This CEMP
9.(Stage 1A)	To monitor and better understand the potential long-term impacts to the Pygmy Blue-tongue Lizard resulting from wind turbine noise, vibration and shadow flickering, the approval holder must submit a Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan (PBTL Research Plan) to the Department for the Ministers approval by within 12 months of the date of this approval [PBTL Research Plan inclusions listed in full decision notification, Appendix Q].	Construction and Operation n	This CEMP Flora and Fauna Management Plan (**Appendix O**) PBTL Research Plan (to be developed by a qualified consultant engaged by Neoen)
8.(Staged 1B).	The approval holder must make a financial contribution to fund the undertaking of the PBTL Research Plan for the purpose of providing an offset for impacts of this action on the Pygmy Blue-tongue Lizard. The approval holder's financial contribution must represent approximately 13% of the total cost of undertaking all aspects of the PBTL Research Plan. The approval holder must provide documentary evidence to the Department showing all financial contributions to the undertaking of the PBTL Research Plan in each compliance report and in a report of the financing and expenditure of the PBTL Research Plan which	Construction and Operation	This CEMP Flora and Fauna Management Plan (**Appendix O**) PBTL Research Plan (to be developed by a qualified consultant engaged by Neoen)

Reference	Condition	Timing	Where Requirement is being addressed
	must be submitted to the Department within 30 business days of completing the PBTL Research Plan and in any case at least 60 business days prior to the expiry of this approval.		
10.(Stage 1A)	In relation to the PBTL Research Plan required under condition 9, the approval holder must provide to the Department contracts and reporting to specifications listed in the decision notification (Appendix Q).	Construction and Operation	PBTL Research Plan (to be developed by a qualified consultant engaged by Neoen)
11-29. (Stage 1A) 9-27)Stage 1B)	Various administrative conditions relating to reporting, compliance, notification of action commencement and completion, process for revision of action management plans, auditing etc (Appendix Q)	Construction and Operation	This CEMP

Table 7: Conditions of NVC approval for Stage 1A, Stage 1B and Common Assets– conditions reference table.

Reference (Decision Notification)	Condition	Actions	Where requirement is being addressed
1 (all)	The applicant must ensure that only native vegetation approved for removal in accordance with this decision is removed. Prior to clearance commencing, the applicant must advise all persons undertaking the vegetation removal or working on site, of all relevant conditions of approval and associated statutory requirements.	Construction and Operation	Design Plans issued for Construction Inductions procedure
2 (all)	If there is any change to the clearance requirement for the development, NEOEN is to confirm the final clearance area and SEB offset requirement on finalising the detailed design of the Project prior to undertaking clearance that varies from this decision.	Construction and Operation	This CEMP
3 (all)	No clearance to occur until Development Approval has been obtained under the *Planning, Development and Infrastructure Act 2016*	Construction	Development Approval achieved March 2021.
4 (all)	Prior to clearance commencing, the applicant must define the area or trees approved for clearance with markings, barriers, pegs, flags or temporary fencing. The markings,	Construction	This CEMP

Reference (Decision Notification)	Condition	Actions	Where requirement is being addressed
	barriers, pegs, flags or temporary fencing must remain in place, in good condition and clearly visible, for the period in which clearance is occurring.		
5, 6 (all) 7 (2021/3231/422; 2021/3230/422)	The Significant Environmental Benefit (SEB) equivalent to the total number of SEB Points indicated within the three NVC decision notifications is to be achieved by the applicant in accordance with the following management actions, which must be completed prior to 1 July 2022 (see Appendix R for detail on SEB requirements)	Construction and Operation	This CEMP SEB Management Plan (to be developed by Neoen)
7 (2021/3219/422) 8 (2021/3231/422; 2021/3230/422)	Members of the NVC or a person who is an authorised officer under the Act may at a reasonable time enter the property of the landowner for the purpose of assessing and recording any matter relevant to this consent. A person undertaking such an assessment may be assisted by other suitable persons. Any such inspection will only be taken after there has been an attempt to contact the landowner.	Construction and Operation	This CEMP
8 (2021/3219/422) 9 (2021/3231/422; 2021/3230/422)	Non-compliance with any of the conditions of this approval must be reported to the Native Vegetation Council as soon as practical after the non-compliance being detected but must be within a maximum of seven days. The report must include details of the nature of the breach, the location and extent of the breach and the actions taken and associated timing for completion of those actions, to address the breach.	Construction and Operation	Non-compliance and reporting system
9 (2021/3219/422) 10 (2021/3231/422; 2021/3230/422)	No clearance is to occur until the attached form, "Decision Notification Acknowledgement", is signed and returned to confirm that the applicant and anyone else who is a party to the agreement, understand and will comply with the decision, including all the associated conditions.	Construction	Neoen management system
10 (2021/3219/422) 11 (2021/3231/422; 2021/3230/422)	The applicant must adequately inform any prospective purchaser, lessee or occupier of the land affected by conditions in this consent, of the relevant conditions	Construction and Operation	Neoen commercial sale procedures

Reference (Decision Notification)	Condition	Actions	Where requirement is being addressed
NOTE	Native vegetation authorised for clearance under a Decision Notification may be a useful resource, as a source of seed for local revegetation projects, for woodcraft purposes or providing hollows for relocation.	Construction and Operation	This CEMP

Table 8: Summary table of Neoen's Commitment to Minimising Impacts. Including document reference, description, timing and where requirements are addressed. The full version of these is available in Appendix A.

Reference	Commitment	Timing	Where requirements are addressed
9.1.1	**Community Outcomes** Neoen has committed to providing a range of community benefits through the duration and development of this project. These include: • Community Benefits Scheme (CBS) • Neighbour Benefit Scheme (NBS) • Benefits to Aboriginal people • Heysen Trail	Pre-construction Construction Operation	CEMP 7.14 Community Engagement
9.1.2	**Land Interests** Current landowners' interests are to be accommodated through the micro-siting process. This process screens for visual impacts and shadow flicker, noise attenuation and farming practice. Further, Neoen will discuss and negotiate with other land holders including, but not limited to, the traditional landowners, the Ngadjuri Nation; the Crown Lands Agency; and the holders of mining interests.	Pre-construction Construction Operation	CEMP 7.1 Noise and Vibration CEMP 7.4 Cultural Heritage CEMP 7.15 Visual Amenity
9.1.3	**Micro-siting** To minimise site impacts the micro-siting process will be used for all project infrastructure. The head contractor will work with Neoen's specialist advisors to undertake this process and develop final site designs and to comply with, at a minimum: • Any Development Approval conditions (as stated in the DNF) • EPA noise level limits • Constraints to minimise EMI impacts • Constraints to minimise aviation impacts • Project adopted setbacks • Occupied dwelling setbacks for turbines • Minimisation of impacts on sensitive flora and fauna, and general minimisation of native vegetation clearance • Any agreements with involved landowners, neighbours, and tenement-holders under the Mining Act.	Pre-construction	CEMP Construction Components 2.3
9.1.4	**General Environmental Impacts**	Pre-construction Construction	CEMP and Sub-Plans

Reference	Commitment	Timing	Where requirements are addressed
	Neon commits to the preparation of Management plans including: • Construction Environment Management Plan • Operational Management Plan • Fire and Emergency Services Plan All plans will be written in accordance with industry standards and requirements. The project site will also follow a decommissioning plan to dismantle infrastructure and rehabilitate disturbed land at the relevant times.	Operation Decommissioning	
9.1.5	**Setbacks** Neoen commits to a series of setbacks including: • A turbine setback of 5.3km from Burra town centre • A minimum distance of 3km between turbines and the Burra Creek Campground • Unless otherwise agreed with the landowner, a minimum distance of 2km between turbines and occupied dwellings • A minimum 50m setback from water courses (including drainage lines) for concreate batch plants • A setback of 100m – 200m for identified European heritage sites.	Pre-construction	CEMP Construction Components 2.3
9.1.6	**Ecology** Areas of Iron-grass (*Lomandra sp.*) and Peppermint Box (*Eucalyptus odorata*) will be mapped and avoided where possible. Where areas cannot be avoided, targeted surveys will be undertaken to determine if they qualify as TEC, prior to construction taking place. Other areas of avoidance include: • Areas of PBTL • *Dodonaea subglandulifera* (Peep-hill Hop-bush) • Areas of high bird richness (as identified by EBS) • Vegetation associations containing mallee woodland, sedgeland or shrubland • Known Wedge-tailed Eagle (WTE) nests found pre-development with a 1km buffer • Areas with active wombat warrens	Pre-construction Construction	CEMP 7.3 Flora and Fauna **Appendix O**

Reference	Commitment	Timing	Where requirements are addressed
	Further, Neoen commits to the completion of a full assessment for flora and fauna, in areas that were not assessed or properties that were not able to be accessed (south-east section of the Project Area), as part of the initial ecological assessment work. Relevant clearance approvals will be sought, and subsequent environmental approval conditions will then be adhered to.		
9.1.7	**Visual Impact and Shadow Flicker** Neoen undertakes to minimise visual impacts, including Shadow Flicker, to residents, landowners and walkers of the Heysen Trail through a series of mitigation measures such as non-reflective coatings on the wind turbines, targeted screen plantings etc. Further, the removal of trees will be minimised, and rehabilitation of disturbed areas will be untaken progressively to maintain amenity as well as environmental health.	Pre-construction Construction Operation	CEMP 7.15 Visual Amenity **Appendix H** **Appendix J**
9.1.8	**Noise** Noise impacts will be minimised, and relevant noise policy and guideless complied with through: • Compliance with EPA noise limits • Noise assessment during micro siting stage • WTG selection that is free of tonality • Preparation of a Construction Noise and Vibration Management Plan	Pre-construction	CEMP 7.1 Noise and Vibration **Appendix M**
9.1.9	**Cultural Heritage** Potential risk to Aboriginal and European heritage will be managed by Neoen through measures including, but not limited to: • Engage archaeologists to carry out site avoidance surveys, and to be on call and assist in identifying any heritage items found during works • Micro-siting to avoid identified sites • Consult with the Ngadjuri to mitigate against inadvertently impacting an ethnographic site • Proper inductions and educations of contractors and workers to ensure awareness and proper management of heritage risks • Continue to progress the EPBC referral in relation to Burra in consultation with the relevant Commonwealth department	Pre-construction Construction	CEMP 7.4 Cultural Heritage

Reference	Commitment	Timing	Where requirements are addressed
	• Maintain appropriate setbacks • Ensure any archaeological deposits uncovered by the proposed development is reported to Heritage SA • Implement a site discovery procedure		
9.1.10	**Traffic** To ensure traffic impacts are appropriately managed, Neoen commits to entering into detailed agreements with Council and DPTI and will do so promptly and in good faith. Further measures to increase traffic safety include: • Road upgrades • Structural engineer advice for load-bearing capacities of bridge infrastructure • Townships will be bypassed by heavy vehicles • TMP recognises school bus routes • TMP recognises Heysen Trail walkers	Pre-construction Construction	CEMP 7.6 Traffic and Access **Appendix N**
9.1.11	**EMI (Electromagnetic Interference)** Neoen commits to undertaking a series of recommendations to mitigate the potential electromagnetic interference from the Goyder South project. Any issues for Goyder Connect will be rectified, including (if necessary) installation of repeater stations, promptly and at its cost.	Operation	CEMP 7.16 Electromagnetic Interference
9.1.12	**Aviation and firefighting** All turbines and meteorological monitoring towers within the Project will be reported to the vertical obstruction database held by Airservices Australia, to ensure their position and height is marked on aeronautical charts and known to the aviation industry. Further, wind monitoring masks will be declared to the Aerial Agricultural Association of Australia, subjected to a NOTAM for specifications on location and height and will be appropriately marked as per the Airservices guidelines. Subject to CFS advice, access tracks will be rehabilitated to a width and condition that accommodates emergency vehicles, and fuel management measures will be maintained as per operational and management plans.	Pre-construction Construction Operation	CEMP 7.6 Traffic and Access

Reference	Commitment	Timing	Where requirements are addressed
9.2	**Worlds End Gorge Reserve** Neoen has secured binding 'Options to Purchase' over two land parcels that encompass the Worlds End Gorge (also known as the Burra Creek Gorge). Neoen intends to sequentially purchase the parcels as successive stages of the Goyder South project achieve financial commitment, in order to create the 'Worlds End Gorge Reserve'. This means that the reserve would commence at a size of approximately 1388 acres and expand to its full size of approximately 2360 acres as Goyder South grows.	Pre-construction Construction Operation	CEMP 7.14 Community Engagement
Pg. 61 Vol. 1 Development Application	**Batch Plant** Should a batch plant be required, Neoen would ensure that the contractor prepares the following: • A detailed layout plan that specifies the plant and equipment to be used on the site. • A site-specific stormwater management approach that contains potentially contaminated water on site and diverts, clean stormwater runoff to natural drainage lines. • A CEMP.		

4.3 Further Approvals, Permits and Licensing

Various further approvals, permits and licensing will be required for the successful delivery of the GWF stage 1. A description of these requirements is provided in Table 9. This register will be maintained by the Health Safety and Environment Manager (HSE) and reviewed before construction and at regular intervals during construction.

Table 9: Approvals, permits and licensing required for GWF Stage 1.

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
Pre-Construction					
DNF Condition 6, 16 & 39 *Planning Development & Infrastructure Act 2016 (SA)* *Local Government Act 1999 (SA)*	Final Design Plans Issued for Approval	Prior to commencement of site works, final detailed plans shall be submitted to the reasonable satisfaction of the Minister of Planning and Local Government. These include project design, WTG selection and specifications, buildings and associated structures (colours, finishes etc.) and Landscaping. A final transmission line diagram will be provided for each stage of the development with any new crossings/borings on, adjacent to, or under the arterial road network.	Typical design for construction compound. Design details of WTG as per planning application. Transmission line design as per planning application.	Designs submitted	GLC
DNF Condition 9 *DNF Advisory Notes - EPA*	CEMP submitted for approval	A CEMP shall be submitted to the reasonable satisfaction of the Minister of Planning and Local Government. Must also meet EPA approval.	Addressed in this CEMP.	CEMP document	GLC

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
DNF Condition 9 *Planning Development & Infrastructure Act 2016 (SA)*	Sub-Plans submitted for approval	Sub-plans shall be submitted to the reasonable satisfaction of the Minister of Planning and Local Government. Sub-Plans have been developed to support the CEMP. These documents identify specific Environmental risks and clearly define the management requirements to mitigate against them.	Addressed in this CEMP.	See Section 8.	GLC
DNF Condition 10	Fire and Emergency Management Plan consultation	A Fire and Emergency Management Plan must be prepared in consultation with the SA Country Fire Service (CFS) and Safe Work SA.	Addressed in this CEMP.	See Section 7 and Appendix I	GLC
DNF Condition 12	Rehabilitation Management Plan	Submitted to the reasonable satisfaction of the Minister of Planning and Local Government. Design elements included in Final Design Plans.	Addressed in this CEMP.	See Section 7 and Appendix H	GLC
DNF Condition 23	Approval for Additional signage	An application to the Regional Council of Goyder if additional signs are required to be displayed upon the subject land other than those identifying windfarm access points and those shown on the approved plans.	No additional signage will be displayed.	See Design Plans	GLC
Environmental Protection Act 1993 *DNF Condition 26*	warranted sound power levels	Monitoring to confirm compliance with the operational criteria based on the final wind turbine generator selection, layout and warranted sound power levels.	Addressed in this CEMP.	See Section 7 and Appendix M.	GLC

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
		Assessments conducted prior to each construction stage in consultation with EPA must be submitted to the satisfaction of the Minister for Planning and Local Government.			
DNF Condition 30 *Road Traffic Act 1961*	Traffic Management Plan	Submitted to the reasonable satisfaction of the Minister of Planning and Local Government.	Addressed in this CEMP.	See Section 7 and Appendix N.	GLC and GE
DNF Condition 30	Engage an accredited Road Safety Auditor	To undertake a safety audit of the route.	Addressed in this CEMP.	See Section 7 and Appendix N.	GLC
DNF Condition 32 & 33	Developer Agreement	For access to and any road works on arterial roads required to facilitate the development the developer shall enter into a Developer Agreement with DIT. Regarding these works and shall contact DIT's Road Assets - Concept Planner, Mr Bonaventure Tan (08) 8648 5243, mobile 0417 767 452 or via email bonaventure.tan@sa.gov.au to discuss any technical issues regarding the required works.	Contractor to consult DIT and develop an agreement for access to and works on any arterial roads.	DIT approached with TMP to inform agreement.	GLC
Heavy Vehicle (Mass Dimension and Loading) National Regulation 2014	Oversize and Over-mass Vehicle Permits	Travel permits are required by the National Heavy Vehicle Regulator for all Oversize and over-mass vehicles.	Contractor to consult the National Heavy Vehicle Regulator for required permits.	Regulator approached with TMP to inform agreement.	GLC and GE

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
Local Government Act 1999	Road Use Approval	Local road use requires approval from relevant Councils prior to construction.	Contractor to consult council and seek their approval of plan for usage of roads in relation the bench prep and site establishment works construction of benches including establishment.	Council has approved road use plan.	GLC
DNF condition 36	Transmission poles in reserves	This must occur in consultation with Department of Infrastructure and Transport.	Contractor to consult with DIT regarding the siting of poles within road reserves.	Transmission Route supplied for approval.	GLC
DNF condition 38	Transmission lines under highways	Works will be undertaken to the requirements and satisfaction of the Commissioner of Highways.	Contractor to consult with the Commissioner of Highways regarding transmission lines under highways.	Transmission Route supplied for approval.	GLC
Planning Development & Infrastructure Act 2016 (SA)	Building Work Approvals	Building work approved by an accredited professional.	Contractor to have all building plans reviewed by an accredited professional.	All plans reviewed.	GLC
Aboriginal Heritage Act 1988	Disturbance permit (section 23)	The authority of the Minister is required for any damage, disturbance or interference of Aboriginal sites, objects of remains.	Addressed in this CEMP.	Contractor will follow the documented procedure for unexpected discoveries. Refer Section 7	Neoen

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
Native Vegetation Act 1991 notification condition 5,6,7	Significant Environmental Benefit (SEB)	An SEB equivalent to the required SEB points is to be chieved, with a report and SEB Management Plan to be to the Native Vegetation Council for endorsement. Or, make a payment to the Native Vegetation Fund. Refer to conditions for details.	Addressed in this CEMP	See Section 7 and Appendix O.	Neoen
EPBC Act condition 4	CEMP	Submit a CEMP for the Minister's approval within 6 months of approval date.	Addressed in this CEMP	Addressed in this CEMP	GLC
EPBC Act condition 5	Bird Adaptive Management Plan (BAMP)	Submit a BAMP for the Minister's approval within 12 months of approval date. Refer to conditions for details.	A BAMP will be developed	To be developed by a qualified consultant via project owner.	Neoen
EPBC Act conditions 6, 7, 8	Offset Management Plan (OMP)	Submit a OMP for the Minister's approval within 6 months of approval date. Refer to conditions for details.	A OMP will be developed	To be developed by a qualified consultant via project owner.	Neoen
EPBC Act conditions 9, 10	Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan (PBTL MRP)	Submit a PBTL MRP for the Minister's approval within 12 months of approval date. Refer to conditions for details	A PBTL MRP will be developed	To be developed by a qualified consultant via project owner.	Neoen
EPBC Act condition 11,	Notification of commencement.	Notification of the Department of the date of commencement of the action within 10 business days of that date.	Addressed in this CEMP and any operations plans	Notifications to be provided within timeframes.	GLC and Neoen

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
EPBC Act condition 15, 16	Submission and publication of plans	Submit and publish approved plans, excluding sensitive ecological data. Plans to remain on website until the end of the approval. Refer to conditions for details.	Addressed in this CEMP	Plans to be provided and published.	Neoen
National Parks and Wildlife Act 1972	Approval for taking of a protected animal (Section 51)	Approvals are required prior to the removal of a native plant or animal (or animal eggs) protected under the Act. This applies for plants on or animals in any reserve, wilderness protection area or zone, Crown land, land reserved for public purposes or private land.	Addressed in this CEMP	See Section 7 and Appendix O.	GLC (Through a qualified consultant)
Landscape South Australia Act	Groundworks that constitute water affecting activity	Approval is required for any water effecting activity.	Pre-Clearance Checks will be conducted.	A Water affecting activity permit would be sought if impact areas are identified.	GLC
South Australian Public Health (Wastewater) Regulations 2013	Wastewater control system application	If a septic tank or other wastewater control system is to be installed at the control building or temporary construction compounds.	Approval being sought for septic tank system.	While this is in progress a temporary pumped system will be used.	GLC
Environment Protection Act 1993	Batching of Concrete Licence	Environmental authorisation for this activity. NOTE: GLC to contact the Environment Protection Authority before acting on this approval to ascertain licensing requirements. CEMP is required for this application with Design plans for the batching plant.	Contract to submit plans to EPB for approval.	Licence Received	GLC

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
DNF Advisory Note – Commissioner of Highways	Notification of Works	Contact DIT traffic management centre on ph. 1800 018 313 prior to undertaking any works that would impact the arterial road network. Complete a notification of works form.	A notification of works form to be completed before undertaking any works on arterial roads.	Notification received	GLC
DNF Advisory Note – Aviation	Vertical Obstacles Notification	The coordinates and estimated survey heights of each turbine must be reported to the Airservices Australia	The contractor to supply Airservices Australia with required information.	Notification received	GLC
	Notice to Airmen (NOTAM)	One month prior to works commencing Airservices must be contacted so that a NOTAM can be published by Airservices advising pilots that construction of tall structures in the area is imminent.	The contractor to supply Airservices Australia with required information.	Notification received	GLC
Neoen Development Application	Bridge Investigation	Seek the advice of a structural engineer to verify the load-bearing capacities of bridge infrastructure (as per recommendation in Jacobs 2020)	The contractor to seek and act on advice regarding use of bridge infrastructure.	Advice received	GLC
During Construction					
DNF Condition 23	Additional signage	No additional signs will be displayed upon the subject land other than those identifying windfarm access points and those shown on the approved plans. If any further signs are required, these will be the subject of a separate application to the Regional Council of Goyder.	No additional signs will be required.	Signage will be as per design plans	GLC

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
DNF Condition 25	Noise level monitoring	Monitoring of noise levels at noise sensitive receivers must achieve standards defined by EPA. Assessments conducted in consultation with EPA and submitted to the satisfaction of the Minister for Planning and Local Government	Addressed in this CEMP.	See section 7 and Appendix M.	GLC
Aboriginal Heritage Act 1988 *DNF Advisory note*	Discovery of Aboriginal sites and objects	Any such discoveries must be reported to the Minister.	Addressed in this CEMP.	Contractor will follow the documented procedure for unexpected discoveries. Refer Section 7	Neoen
Native Vegetation Act 1991	Amendments to Native Vegetation clearance approval (If required)	Approval by the Native Vegetation Council is required for the amendment to a clearance approval. An NVC accredited consultant is required to conduct vegetation assessments and submit a formal clearance application to the Council.	Addressed in this CEMP.	See Section 7 and Appendix O.	Neoen
Native Vegetation Act 1991 notification condition 8	Non-compliance Reporting	Any non-compliance to be reported to the NVC as soon as practical, but within a maximum of 7 days of being detected. Refer to conditions for details.	Addressed in this CEMP and operational plans	Incorporated into non-compliance reporting system.	GLC and Neoen
EPBC Act condition 17	Annual compliance reporting	Submit a compliance report for each 12 month period following date of commencement of action, within 60 business days of that 12 month period ending. Reports to be published on the	Addressed in this CEMP and operational plans	Full reports to be provided to the Department and	GLC & Neoen

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
		website. Sensitive ecological information to be excluded from publications to website. Refer to conditions for details.		edited versions to website.	
EPBC Act condition 18, 19	Reporting Non-compliance	Incidence of non-compliance to be reported within 2 business days of becoming aware of the incident. Details of the incident to be reported no later than 10 business days of becoming aware of the incident. Refer to conditions for details.	Addressed in this CEMP and operational plans	Incorporated into non-compliance reporting system.	GLC and Neoen
EPBC Act condition 20, 21, 22	Independent audit	Independent audits to be conducted as requested by writing from the Minister. Audit report to be published on the website within 10 business days of the Department's approval. Refer to conditions for details.	Addressed in this CEMP and operational plans	Incorporated into environmental management system	GLC and Neoen
EPBC Act condition 23-28	Revision of Action Management Plan (if required)	Applications for a variation to an action management plan may be made to the Minister, subject to provisions of these conditions, 23-28.	Addressed in this CEMP and operational plans	Incorporated into environmental management system	GLC and Neoen
Prior to commencement of Commercial Operations					
DNF Condition 13	Operation Environmental Management Plan	Submitted to the reasonable satisfaction of the Minister of Planning and Local Government.	Addressed in this CEMP	See Section 8 and Appendix K.	Neoen

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
DNF Condition 27	Monitoring to ensure the absence of tones	The absence of tones must be verified by results of post-construction at locality (Receiver H4) as shown in the Acoustic Report (June 2020) or such other localities to the satisfaction of the EPA.	Addressed in this CEMP.	See section 7 and Appendix M.	Neoen
DNF Condition 28	Noise level monitoring	Independent assessment of noise within 3 months of operation. Must monitor noise levels at six localities at least – H4, H26, H37, H57, H61 and H126 as shown in the Acoustic Report (June 2020) or such other localities agreed to by the Minister having consulted with the EPA.	Addressed in this CEMP.	See section 7 and Appendix M.	Neoen
DNF Advisory Note – Aviation	Vertical Obstacles Notification	On completion of works, the VOD should be advised of the surveyed height and location of each turbine so that the wind farm details can be accurately recorded in the database.	The contractor to supply Airservices Australia with required information.	To be supplied.	GLC
EPBC Act condition 12	Notification of commissioning	Notification of the Department of the date of commissioning, within 10 business days of that date.	Addressed in this CEMP and any operations plans	Notifications to be provided within timeframes.	GLC and Neoen
6 months post Operation					
DNF Condition 8	Monitoring for HF noise	Post-operational monitoring to be conducted by a qualified consultant within six months of wind farm commissioning including any sources of	Addressed in this CEMP.	See Section 7 and Appendix M.	Neoen

Legislation/Conditions	Requirement	Details	Expectations	Contractors Response	Organisation Responsible
		High Frequency (HF) noise that could impact on communication equipment.			(Through a qualified consultant)
Decommissioning					
DNF Condition 14	Draft Decommissioning Rehabilitation Plan	Prior to Decommissioning – Submitted to the reasonable satisfaction of the Minister of Planning and Local Government.	Addressed in this CEMP.	See Section 8 and Appendix L.	GLC
DNF Condition 15	Final Decommissioning Rehabilitation Plan	6 months prior to Decommissioning – Submitted to the reasonable satisfaction of the Minister of Planning and Local Government.	Addressed in this CEMP.	See Section 8 and Appendix L.	GLC
South Australian Public Health (Wastewater) Regulations 2013	Wastewater control system decommission	If a septic tank or other wastewater control system must be decommissioned to Council requirements	Addressed in this CEMP.	See Section 8 and Appendix L.	GLC
EPBC Act condition 29	Notification of completion.	Notification of the Department within 30 days after the completion of the action, with completion data.	Addressed in operations plans	Notifications to be provided within timeframes.	Neoen

5 ROLES AND RESPONSIBILITIES

Both developer (Neoen Australia) and Contractor (GLC) will have roles in implementing the requirements of the CEMP. In situations of compliance and some areas of technical monitoring, qualified consultants should be engaged.

5.1 Contractors Organisation Structure

GLC Australia will use the organisation structure presented in Figure 6 to achieve its commitments for the construction of GWF Stage 1.

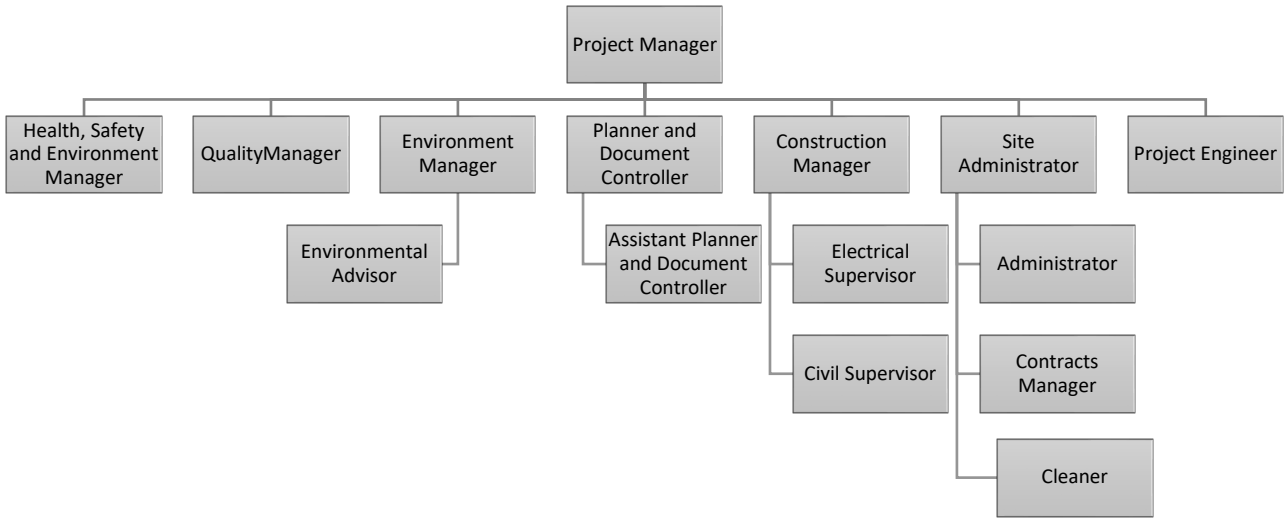

Figure 6: Organisational Chart for GLC during the GWF Stage 1 Development.

5.2 Key Personnel

The roles and responsibilities of the key personnel for the project are outlined in Table 10. This table includes a description of the responsibilities of Neoen, GLC and Sub-Contractors.

Table 10: GWF Stage 1 key personnel and their responsibilities.

Role	Responsibility
Neoen Representative and Neoen Environment Representative	The Neoen Representative will: • Be the key contact and representative of Neoen. • Ensure that contractual documents include environmental responsibilities. • Direct GLC to develop the CEMP and associated sub-plans and ensure that these are approved prior to the project commencing. • Ensure that all relevant approvals/permits/licenses allocated to Neoen in Section 4.3 are obtained prior to works commencing. • Take overall responsibility for ensuring the project meets its compliance obligations and environmental requirements are implemented. • Agree to procedures for emergency response.

Role	Responsibility
	• Agree to frequency and method of auditing, monitoring and other matters which are to be reported to Neoen.
Project Manager	The project manager will: • Ensure that all works comply with relevant regulatory and project requirements, as documented in this CEMP. • Ensure the requirements of the EMS documented in this CEMP are fully implemented, and in particular, that environmental requirements are not secondary to other construction requirements. • Participate and provide guidance in the regular review of this CEMP and supporting documentation. • Stop work immediately if an unacceptable impact on the environment is likely to occur. • Approve and issue project documentation that represents Neoen deliverables. • Deliver project reporting to GLC management and Neoen. • Support the development of the skills of project team members to meet the needs of the contract. • Undertaking corrective action to overcome deficiencies highlighted through work reviews or contract audits. • Manage and co-ordinate project personnel and subcontractors. • Provide sufficient resources to implement the requirements of the project. • Ensure project employees and subcontractors are qualified and accountable for effectively achieving the quality and environmental requirements established for the project. • Manage the preparation and review of project risk assessments and implement control measures and continuous improvement initiatives. • Review meeting minutes, audit results and project quality and environmental records. • Record and investigate any non-conformances and implement corrective actions.
Construction Managers	The construction manager will: • Ensure that all works comply with relevant regulatory and project requirements. • Ensure the requirements of this CEMP are fully implemented, and that environmental requirements are not secondary to other construction requirements. • Participate and provide guidance in the regular review of this CEMP and supporting documentation. • Stop work immediately if an unacceptable impact on the environment is likely to occur. • Identify resources required for implementation of the CEMP. • Co-ordinate action in emergency situations and allocate required resources. • Control general day to day on-site issues and report to the Project Manager. • Manage and co-ordinate all on-site personnel under GLC control. • Liaise and coordinate with on-site Neoen representatives, all subcontractors and members of the public. • Record and report any non-conformances to the Project Manager and assist in the implementation of corrective actions. • Frequently review the project risk assessment and recommend improvements.
Health, Safety and Environment Managers	The health, safety and environment officer will: • Ensure staff, sub-contractors and visitors under GLC control undertake a site induction. • Ensure that records of induction training and updates are maintained for all staff.

Role	Responsibility
	• Prepare site induction materials based on the CEMP, Sub-Plans and other GLC systems documents. • Ensure that weekly toolbox and management meetings and daily work team briefings occur. • Ensure that complaints are investigated to ensure effective resolution.
Environment Manager	The Environment Manager will: • Be responsible for managing environmental aspects of the project. • Check that all environmental requirements, licenses and procedures are implemented. • Advise staff of special requirements. • Conduct or commission a consultant to undertake environmental audits/monitoring during all stages to ensure implementation of requirements. • Coordinate specialist environmental subcontractors (e.g. ecologists, water quality monitoring, air quality monitoring, noise and vibration monitoring, etc.) where required. • Determine and/or ensure environmental controls and procedures are in place and maintained during all phases of the project. • Determine the training/instructions required for staff to be able to meet their environmental obligations. • Report environmental incidents during construction. • Be responsible for the emergency response procedure for environmental incidents. • Ensure that site activities comply with EMS, CEMP and EWMS and that relevant records are kept. • Take overall responsibility for the implementation of environmental matters on the project. • Support development, implementation, monitoring and updating of the CEMP and sub plans. • Report to the Project Manager on the performance and implementation of the CEMP. • Ensure that management reviews of the CEMP are undertaken every 6 months, documented and actions implemented. • Ensure that environmental risks of the project are identified and that appropriate mitigation measures are implemented. • Identify where environmental measures are not meeting the targets set and where improvement can be achieved. • Obtain and update all environmental licenses, approvals and permits as required. • Manage environmental record keeping and reporting. • Manage environmental reporting within the Project team, to the Project Manager and for regulatory authorities. • Consult and liaise with Neoen on environmental matters, including compliance with all regulatory requirements. • Liaise with relevant regulatory authorities and stakeholders, as required. • Conduct site monitoring, inspections and audits. • Develop and facilitate induction materials, toolbox talks and other training programs regarding environmental requirements for all site personnel. • Notify Project Manager, Neoen and relevant authorities (under direction from Project Manager and Neoen) in the event of an environmental incident and manage close-out of these. • Stop activities where there is an actual or immediate risk of harm to the environment, or to prevent environmental non-conformities, and advise the Project Manager, Construction Manager and Supervisors. • Monitor performance and adherence to the requirements of GLCs IMS. • Review environmental training for all levels of staff on an on-going basis to ensure the level of awareness is sufficient for the CEMP to be effectively implemented. • Carry out weekly environmental site inspections and propose actions to address shortfalls. • Raise environmental incidents if they occur, and coordinate investigation and close-out.

Role	Responsibility
Project Engineer	The Design Engineer will: • Ensure that the project is designed in accordance with the requirements of the Development Approval as documented in the CEMP and supporting documentation. • Ensure that works are carried out in accordance with the requirements of the CEMP and supporting documentation, including the implementation of all environmental controls. • Identify environmental risks. • Check on-site implementation of the design requirements. • Provide input into the preparation of environmental planning documents as required. • Ensure that instructions are issued, and adequate information provided to employees that relate to environmental risks on-site. • Identify resource needs for implementation of CEMP requirements and related documents. • Take action in the event of an emergency and allocate the required resources to minimise the environmental impact. • Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Project Manager and Environment Manager. • Review design in the field, in relation to the environmental context of the site, to avoid impacts, and advise the Project Manager and Construction Manager of the circumstances. • Seek advice from the Environment Manager if there is a perceived risk of impacts. • Be responsible for the detailed design and layout of the batch plants, water and wastewater management systems, ponds and washout pits, storage and stockpile areas and batch plant emission/materials management equipment.
Supervisor	The Supervisor will: • Supervise and implement environmental controls on site during the construction works. • Ensure that all personnel have received the training required to meet their environmental obligations. • Report environmental incidents to the Project Manager and Environment Manager. • Be responsible for activating the response procedure during an emergency situation, and immediately informing the Project Manager, Construction Manager and Environment Manager. • Undertake any environmental duties as defined by the Project Manager and Construction Manager. • Control field works and implement/maintain effective environmental controls. • Where required, undertake environmental risk assessment of works prior to commencement. • Ensure all personnel are inducted prior to commencement of works. • Attend to any spills or environmental incidents that may occur on-site. • Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Project Manager, Construction Manager and Environment Manager. • Stop activities where there is an actual or immediate risk of harm to the environment and advise the Project Manager, Construction Manager and Environment Manager. • Establish site controls as per the CEMP, sub-plans, sensitive area plans and procedures. • Carry out regular environmental site inspections and propose and implement actions to address shortfalls. • Implement mitigation measures in the event of actual or potential non-conformances or emergencies. • Exercise an appropriate level of diligence in enforcing work practices that minimise adverse environmental impacts. • Ensure all employees in the workplace are aware of the environmental issues associated with the works and comply with environmental requirements. • Ensure all employees report any environmental risks or hazards.

Role	Responsibility
	• Liaise with employee / subcontractors to ensure prompt response when environmental issues are raised.
Community Liaison Officer	The role and responsibility of the Community Liaison Officer is to: • Liaise with the construction management team to ensure timely and effective engagement with the local community on construction activities. • Communicate through website, newsletters, and advertising. • Collect information on complaints and provide information to Environment Manager to investigate.
Sub-Contractors	The roles and responsibilities of the Contractors and staff are to: • Comply with all legal and contractual requirements, including the Conditions of the Development Approval and the Construction Contract. • Undertake work in accordance with contract specifications, which are to include the requirements of the CEMP. • Participate in induction and training as directed. • Write EWMS to support activities that relate to project compliance and submit these for approval. • Collect and provide monthly environmental usage data to the environmental manager. • Comply with and implement environmental controls as directed. • Report environmental incidents to their immediate GLC supervisor.

6 IMPLEMENTATION

6.1 Management Tools

GLC is responsible for meeting the GWF Stage 1 project commitments and regulatory requirements. This will be achieved through the effective implementation of the EMP presented in this CEMP. To this end they will use a combination of management tools to manage their EMP, train and equip personnel (staff and contractors). These include inductions, meetings and communication, Environmental Work Method Statements, monitoring and audits, a permitting system, reporting, incident reporting and compliance, complaints system, management of contractors and document management and review (Table 11). At foundation of the EMS are two Information technology (IT) systems that support effective project management outcomes (Table 12). A more detailed description of some of these components is provided below.

It should be noted that some of the reporting completed within the CEMP framework must be supplied to Neoen for reporting requirements to various authorities, including under the *EPBC Act* Approval Decision.

Table 11: management tools to be used for achieving effective EMP outcomes.

Management Activity	Description
Inductions	All employees, sub-contractors and site visitors will complete an induction prior to commencing work on the Goyder South project site. The induction will include safety, access, and a review of environmental constraints and management requirements.
Meetings and Communication	Regular management team meetings will be used to review targets against project commitments and regulatory requirements.
Environmental Work Method Statements	These will be developed on an as needed basis to provide a detailed description of specific construction tasks to ensure environmental and personnel safety.
Monitoring, Inspections and Audits	A system of monitoring, inspections and audits will be used to track project achievements against environmental and construction targets, and in line with regulatory requirements.
Permitting System	A permit system will be used to ensure that work does not progress without suitable controls in place.
Reporting	All data and activity from monitoring, inspection and audits will be assessed and reported on to support the effective implementation of the EMP, ensure that compliance markers are being met and allow for mitigation and adjustment of activities when incidents occur. Reporting for regulatory requirements will be undertaken.
Reviews	Regular reviews will be conducted based on the data received from audits to ensure that the CEMP is kept up to date and ensure that the project is achieving its targets.
Incident Reporting and Compliance	This will follow the Incident management system already established by GLC. It will be used to ensure that any issues are addressed quickly and efficiently to allow the smooth progress of the project, and also allow any relevant incident and compliance reporting to be prepared for Neoen's reporting requirements under regulatory approvals.

Management Activity	Description
Complaints System	This system will be used to ensure that GLC is able to engage with the public and manage community expectations.
Management of Sub-contractors	An effective contracting, monitoring and compliance system will provide an effective tool to ensure that all sub-contractors are reaching project goals while complying with the requirements of the EM.
Document Management	A series of documents will support the effective outcomes of the project. These will be managed as part of the Quality Management System already used by GLC.
Work Health and Safety (WHS)	GLC's WHS system will provide a foundation for inductions and drive safety standards for all staff and contractors.

Table 12: GLC's IT systems and the components addressed with each.

IT System	Components Addressed
Aconex	This is a cloud-based Quality Management System. It is primarily a document management system and will be used to support the design, construct and commission stages of GWF. It will be used for the review and approval of documents for adequacy prior to issue to ensure currency.
HammerTech	HammerTech is an integrated management system that will provide range of project implementation tools including: • Online Inductions • Incident Management system • Plant and equipment onboarding • COVID 19 compliance • Register workers • Manage personnel • Perform inspections • Manage permits • Maintain proper governance The system will be used to present key compliance and safety statistics across the project, including Lost Time Injury Frequency Rates (LTIFR) and Medically Treated Injury Frequency Rates (MTIFR).

6.2 Induction

GLC will ensure that all employees, sub-contractors and visitors receive induction training on the environmental constraints, risks and management requirements associated with GWF Stage 1 as described in Section 7 in this CEMP and in the Sub-Plans. This training will be completed prior to commencing work on the GWF Stage 1 site. As the extent of knowledge required by personnel, sub-contractors and visitors is different, induction training will be targeted to the audience. For example, delivery drivers will undergo an induction tailored to reflect the reduced risk to safety and the environment. At a minimum, the induction will include safety, access, and a review of environmental constraints and management requirements. All visitors to site must be accompanied by a fully inducted representative. All project personnel from supervisory to managerial level should receive more detailed training as they will be required to implement the EMS. The induction of all staff is the responsibility of the Health Safety and Environment Manager (HSE). This person should also ensure that records of training are maintained.

The induction will address a range of issues including, but not limited to:

- The GWF Stage 1
- EMS System and how it relates to them
- Regulatory requirements including duty of care and potential consequences of infringements
- Identification of threatened species, raptors and their habitat and associated duty of care
- Identification of environmentally sensitive areas, clearance constraints and exclusion zones
- Interaction with heritage areas and native vegetation during clearing activities and procedures
- Indigenous and heritage awareness and discovery procedures
- Emergency plans and evacuation procedures for bushfires
- Designation locations and procedures for washdown of vehicles, maintenance etc.
- Identifying and understanding site procedures for accessing work areas, including high risk areas if necessary
- Traffic Management
- Communication
- Incident management training
- Identification and management of non-compliance
- Other work activity specific information

6.3 Meetings and Communication

Toolbox Meetings

The Project Manager and HSE will ensure that supervisors hold at least one weekly toolbox meeting with staff and sub-contractors to discuss issues associated with the scheduled work. These meetings will be used to highlight and discuss relevant environmental and safety issues as required. A Safe Work Method Statement (SWMS) process will be used to help personnel identify, analyse, and manage the hazards that exist in the work they undertake. Examples of current tasks and environmental risks will be used by the supervisor to remind staff of the EMS and their responsibilities under this system. The toolbox will use a Hob Safety Analysis (JSA) to support personnel to examine the task they are about to undertake and:

- Break the job down into separate and defined steps
- Identify the potential hazards (including potential environmental or cultural heritage hazards) that could occur
- Determine steps to mitigate or prevent potential hazards that could cause injury, loss, damage, or environmental incident

These meetings will also be used to identify any incidents that have occurred and discuss the mitigation and compliance action that has been required as a result.

Management Meetings

The Project Manager will ensure that a weekly management meeting is used to review the:

- Environmental risks associated with the current works.
- Monitoring, site inspections and audit data collected to assess compliance with management and mitigation measures.
- Any current approvals, permits or licensing required.

- Incidents and compliance issues and determine the appropriate remediation, mitigation and management measure required.
- Requirement for referral and address the consequence for any non-compliance.

Communication

The Project Manager and HSE will clearly communicate with managers and supervisors to ensure that any environmental risks are clearly understood. Any compliance breaches will be quickly communicated to ensure that the impact of these is limited. This will occur in the form of meetings or email memos as required.

6.4 Monitoring, Inspections and Auditing

Monitoring

Monitoring is the regular repeated data collection that will be used to track change over time on the site. Performance criteria, non-compliance thresholds and associated corrective action are discussed for each environmental factor in section 7 and detailed in relevant sub-plans (see Appendices). Environmental parameters subject to monitoring include:

- Climatic data
- Pre-Clearance Checks and Fauna assessments over the construction and operation period of the GWF Stage 1.
- Vegetation clearance undertaken, for comparison with site constraints and regulatory reporting
- Noise
- Dust
- Stormwater Management
- Unexpected finds

Some monitoring will be conducted by the Environment Manager, other more specific monitoring activities will be carried out by external consultants. For any non-compliance detected, refer section 6.8.

Inspections

During construction, there will be a continuous assessment of the project area, where individuals and work crews will be required to demonstrate the pertinent requirements of the CEMP are being adhered to. Inspections will be used to assess work zones before, during and after construction to ensure that works fit within the parameters defined by the CEMP and Sub-plans (Table 11). These include:

- Micro-siting
- Pre-Clearance checks
- Daily and weekly progress and compliance checks

A series of forms will be developed to ensure that all of the appropriate environmental factors are considered for each location to be inspected and activity occurring on the GWF Stage 1 site. These forms will be used as the foundation of the permitting system. For any non-compliance detected, refer section 6.8.

Auditing

Independent, external audits of the site and project approval conditions by suitably qualified consultants will be used to assess compliance and ensure that construction activities fall within the requirements of the CEMP and Sub-plans. External audits will be conducted quarterly to ensure that targets are being met (Table 13), or as required by regulatory bodies (e.g. the Cwth Minister for the Environment). Further, both an internal and external review will be conducted every 6 months to review environmental objectives and targets, overall compliance, management controls and corrective actions. This schedule can be increased to suit the rate and scale of assessments required. The reporting from these audits will be used to support the implementation of the CEMP.

Where practicable NATA accredited laboratories will be used for any testing of samples taken in association with approvals, licenses or consent conditions. Laboratory detection limits must be below the adopted assessment criteria. Quality Assurance and/or control measures such as collection and testing of duplicates and blind duplicates will be used to ensure the accuracy and quality of the required monitoring.

Table 13: Environmental Monitoring and Auditing Schedule

Timing	Internal/External	Objective
Daily	Internal Monitoring and Inspections	Site Supervisor and or Environmental Advisor to inspect the site and sub-contractor activities.
Weekly	Internal Monitoring and Inspections	Environment Adviser or Environment Manager to conduct an inspection of sites pre-, during and post construction risks to ensure that all exclusions zones are undisturbed, identify any threats to native species and identify any other potential environmental threats.
Weekly	Internal Inspections	Environment Manager to conduct an inspection of the site on a weekly basis, completing the Environment Inspection Checklist. Environment Manager to provide a report weekly to Project Manager and monthly to the Neoen representative on compliance with CEMP.
Quarterly And Ad Hoc	External Audit	Qualified consultants to inspect the site. Project Manager, HSE and Environment Manager will respond to the external audit, implement recommendations, and monitor performance to achieve targets.
Six (6) monthly	Review	Project Manager, HSE and Environment Manager to review management targets and environmental objectives.
Six (6) monthly	External Review	Relevant body to assess compliance with the CEMP and relevant approvals, licenses and permits. Relevant body to assess management controls and any non-compliance activities.

6.5 Reporting

Project Management Report

The Project Manager shall provide a monthly report to the Neon Representative to address:

- Progress of construction activities
- The outcomes of monitoring activities
- Approvals, permits and licensing required and received
- An outline of environmental and heritage management and mitigation activities applied
- A summary of complaints received
- Compliance issues that need remediation or referral

Internal Reporting

Monitoring data and weekly site inspections will be written into a report for the Project Manager. The outcomes of inspections will be presented on reporting forms. These will be used as part of a permitting system.

Compliance Reporting

An annual compliance report will be prepared for the Department (DCCEEW), with regards to matters of national significance, in accordance with the *EPBC Act* Approval Decision notice (Appendix Q).

6.6 Review

A document review process ensures that environmental documentation including this CEMP and other documents within the EMS are updated as appropriate for the specific works that are occurring on-site. These should be considered live documents and will be regularly reviewed and revised to reflect the plan of construction and ensure that the document addresses environmental issues, changes in legislation, policies, guidelines, and work practices.

A minor review of the CEMP will be conducted by the Management team bi-annually following the external Audit. A major review shall be conducted both internally and externally every 6 months. Where adherence to the requirements in this CEMP are found to be unsatisfactory in achieving broader environmental and site management goals, action will be taken to investigate the cause and make amendments to the CEMP as required. Amendments to this plan may be made:

- To correct errors or ambiguities.
- To reflect new or revised company system procedures, practices or site work procedures.
- To incorporate changes to the conditions of the Conditions of Development Approval, permits, licenses or sub-plans.
- To correct any non-conformances.
- To accommodate changes to design.
- As a result of first, second-or third-party audit recommendations.
- As a result of feedback from regulatory agencies.
- Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Health Safety and Environment Manager to prepare the revised documents. The revised document will then be issued to the Project Manager. Amendments to this CEMP shall be approved by the Project Manager and reviewed by Neoen prior to re-issue.

6.7 Permit System

Site inspections will be used to control work activities on site. In order to proceed with work in an undisturbed area an inspection will be required, and this will need to be signed off by the Project, Construction or Environmental Manager for works to proceed. Following the same process an inspection can bring about a stop work when signed off by the Project, Construction or Environment Manager.

This permit system will be used in conjunction with the pre-construction micro-siting procedure and the PBTL relocation procedure presented in the PBTL Management Plan.

6.8 Incident Risk and Non-compliance Reporting

Incident Reporting

GLC's Incident Reporting System will provide the foundation for the management of incidents on site. The reporting matrix at the foundation of this system is presented in Table 14. All reporting forms and procedures are held by the HSE Manager. An Incident Report Form will include:

- The area where the incident occurred
- The details of incident (suspected cause, was there environmental harm etc.)
- The location of the emergency or incident
- Personnel, sub-contractor involved
- Time of incident

- Recommended future actions

All forms will be submitted to a Construction Manager, Supervisor or the HSE Manager for reporting within the organisation (or externally as required), and for a process of continuous improvement to be implemented. The Construction Manager and HSE will determine the extent of escalation with each report. All incidents will be reported to Neoen (the Client) for reporting to relevant regulatory bodies where required.

Table 14: Incident Reporting Matrix.

Incident Reporting Matrix		
Event	**GLC Action**	**Neoen Action**
Incident of Non-compliance Occurs	• The **staff member** observing the incident will immediately report it to their **Supervisor** and complete and incident report form. The incident will be added to compliance register. • The scene must be preserved. • The initial notification to client shall be within 20 minutes or as soon as is reasonably practical. • This initial notification shall be via phone call, text or verbal notification methods and must be made by the **GLC Project/ Construction/HSE Manager** or their delegates only	• Upon receipt of the notification Neoen will prepare to make the initial notification to the relevant regulatory bodies with required details. • Support GLC in developing notification documentation and prepare for investigation.
Incident Notification	• The one-page incident notification form must be submitted to the Client by the end of the shift in which the incident occurred using the GLC Incident Notification Form (GLC-IMS-HSE-FRM-077). • All incidents will be added to GLC integrated management system HammerTech.	• Once incident notification documentation is received, Neoen will prepare initial written notification for relevant regulatory bodies within required timeframes: o 2 days for EPBC incidents • Incident to be added to Neoen's internal incident reporting system.
Incident Investigation & Final Incident Report	• All incidents are subject to an investigation in line with the Incident Reporting Procedure (GLC-IMS-HSE-PRC-019). • This investigation will usually be carried out by the **Supervisor**, in conjunction with the **Project, Construction or Environmental Manager**. • The incident investigation form must be submitted to the Client within **7-10 days** • Reports shall be submitted using the GLC Incident Investigation Report Form (GLC-IMS-HSE-FRM-024). • With the exception of Serious/Critical Incidents, all other incidents will be closed out in a time frame to be determined in	• Once the incident report is received, Neoen will prepare detailed notification to relevant regulatory bodies within required timeframes: o 7 days for NVC incidents o 10 days for EPBC incidents • Support GLC in conducting an investigation into the incident and review corrective actions proposed. • Investigation and corrective action reports to be submitted to regulatory bodies as required, and within required timeframes. • Any specific corrective actions directed by regulators will be forwarded to GLC for implementation.

Incident Reporting Matrix		
Event	**GLC Action**	**Neoen Action**
	consultation with the Client to ensure a thorough investigation is completed. • Incident Investigation Reports shall be submitted using the GLC Incident Investigation Report Form (GLC-IMS-HSE-FRM-024).	
Corrective Actions	• Corrective actions arising out of an incident or investigation must be recorded in the Project Corrective Actions Register for review and close-out. • The **Construction or Environment Manager** will oversee implementation of the corrective and preventative actions prescribed. • The **Project Manager** will ensure that the non-compliance has been actioned and corrective and preventative actions implemented. • The **Project Manager** will report details of non-compliance to the **Environment Manager** and ensure that the non-compliance records are added to the compliance register.	• Support GLC in implementing and monitoring corrective action. • Submit corrective action report to regulators as required, and include a full report of the incident and corrective actions in any annual compliance reporting that is required (eg EPBC Approval conditions).

Emergency Contacts

The key GLC emergency contacts are presented in Table 15. These details will be readily available to all staff and contractors, provided during the induction process, presented in signage at all compounds and will be prominent in all materials provided to contractors. In addition, key contacts for flora and fauna related emergencies are presented in Table 16.

Table 15: GLC key emergency contacts

Person	Role	Phone number
GE		
Rajesh Dapurkar	Project Manager	0409 901 806
Jack Newton	Construction Manager	0458 254 674
Jeff Hill	Environment, Health and Safety Manager	0428 462 126
GLC		
Jose Joven Guerrero	Project Manager	0483 291 437

Philip Cavanagh	Construction Manager	0407 517 770
Matthew Moore	Health, Safety and Environment Manager	0418 652 640

Table 16: Key emergency contacts

Contact	Email	Phone number
Clare Valley Veterinary Services Pty Ltd.	clare@cvvs.com.au	1300 288 387
Clare Animal Health		(08) 8842 1074
Mid North Native Wildlife Rescue		0408 051 266
DEW (Fauna Permits Unit)	dewfaunapermitsunit@sa.gov.au	(08) 8124 4972
DEW (Scientific Research Permits)	DEWResearchPermis@sa.gov.au	(08) 8124 4856
DEW (Animal Welfare - Licence for teaching, research or experimentation involving animals)	DEWAnimalWelfare@sa.gov.au	(08) 8207 7731
Wildlife Ethics Committee	DEW.WildlifeEthicsCommittee@sa.gov.au	(08) 8463 6851
PBTL Recovery Team Threatened Fauna Ecologist Northern and Yorke Region Department for Environment and Water 6/17 Lennon Street, Clare, SA.		(08) 8841 3403

Risk Register

GLC will use a risk register to track risks based on monitoring, incidence reporting and near misses. These will be assessed by managers with suitable mitigation strategies identified and applied.

Compliance

Section 5 (52) of the *Environment Protection Act 1993* requires any person who becomes aware of an event that may or has caused environmental harm, reports the event/incident to their employer. Details of the nature and circumstances of the event must be provided. Approval notices issued by the Native Vegetation Council (NVC) and the DCCEEW also require the provision of incident reporting in relation to any un-authorised disturbance to native vegetation or matters of national environmental significance, in accordance with the relevant approval notices.

The Project Manager will ensure that Neoen are notified within the appropriate timeframe, who in turn will notify the appropriate external agencies (e.g. EPA, DEW, DCCEEW, NVC). A written report will be provided to the relevant regulatory bodies within the required timeframe and to specifications required (see requirements for each relevant authority) following the initial notification of an emergency or incident or receipt of monitoring results.

The report will include:

- Results and interpretation of samples taken at the time of the incident and analysed.
- Outcomes of actions taken at the time of the incident to prevent or minimise environmental harm.
- Proposed actions to prevent a recurrence of the emergency or incident.

6.9 Complaints Procedure

The complaints and dispute resolution procedure has been developed by Neoen following the Australian/New Zealand Guidelines for complaints management (National Energy Infrastructure Commissioner). The process for managing complaints and concerns raised by community members will involve several key steps including receiving, registering, investigating, responding to and addressing complaints. This procedure will enable stakeholders to raise grievances or disputes with Neoen and GLC and will provide a framework for addressing and resolving issues in an appropriate and timely manner.

Complaints Mechanism

A range of mechanisms are available to facilitate the lodgement of complaints, including:

- A community call line
- A project email address
- A project mailing address
- Lodging and Incident/Complaints Form to a regulatory body

The complaints mechanisms will be advertised on the project website, as well as through community information sessions, factsheets, signage at the construction compound and other relevant community publications. The contact details are presented in Table 17.

Table 17: Contact details.

Contact Form	Details
Website	www.goyderenergy.com.au
Telephone	1800 966 166
Email	contact@goyderenergy.com.au
Mail	7-9 Main Street, Burra, SA 5417

Receiving and Registering Communications

Communications will be received either verbally in person or via phone, or in writing via email or mail. All communications will be recorded in the stakeholder register. The form of the communication may be an inquiry, concern or complaint. If it is an inquiry or concern, these will be dealt with directly. Complaints will be dealt with following the procedure below.

Receiving Complaints

A set of standardised information will be collected and allocated to each complaint. This will be recorded and filed in complaints register to ensure an efficient and standardised process. The information includes:

1) The complainant's name and address.
2) A unique reference number allocated to the complaint and communicated to the complainant.
3) If relevant any applicable turbine or monitoring mast reference number.
4) The complainant's concerns including date, time, prevailing conditions and description of the complaint.

All complaints registers and data will be made available to Council with any significant complaints being reported to Council directly.

Acknowledging Complaints

All complaints will be delivered to the Construction Projects manager and addressed via phone or email with any written correspondence dated and kept on file. Where a complaint can be easily resolved or is better categorised as a request by stakeholder for additional information, it may be appropriate for the Construction Project Manager to immediately respond to the stakeholder.

1) Non-urgent complaints will be acknowledged within 3 business days of the complaint being submitted.

2) Urgent complaints will be addressed within 24 hours.

The acknowledgement will include:

- A summary of the complaint; with a reference number provided.
- The opportunity to clarify issues relating to the complaint or a request for further information if required.
- The proposed investigation approach.
- An estimated timeframe in which the stakeholder can expect to receive a response.

Investigating Complaints

The Construction Project Manager is responsible for ensuring all complaints are investigated and that all reasonable attempts to seek a resolution are made. The outcomes of the investigation will be reported to an appropriate Neoen staff member. Accurate records of the investigation must be maintained including records of meetings, discussions and activities.

The investigation may involve:

- Site visits, particularly in the instance of reported property damage.
- Consultation with Neoen staff or contractors, including senior management when required.
- Acquiring monitoring data and evidence (e.g. for noise or dust complaints).
- Contacting external stakeholders.

Responding to stakeholder/complainant

Following the investigation, the results, including details of the findings and proposed resolution, will be clearly explained to the complainant. In most circumstances, it will be at this stage that the complainant will determine if the resolution is satisfactory.

Closing the complaint

If the process has been concluded appropriately then the Construction Project Manager will close the complaint and make a file-note to this effect in the Complaints Register. Formal written correspondence must also be issued to the complainant confirming that the complaint has been closed.

Review

If the complainant is not satisfied with the investigation and resolution, then the complainant has a right of review. This will be undertaken by Neoen to ensure that the complaint process has been properly followed. If the complainant is still not satisfied with the investigation and proposed resolution, the complainant will be advised by Neoen that they have the ability to contact the National Energy Infrastructure Commissioner. Neoen will provide complainants with the relevant contact details:

aeic@aeic.gov.au
1800 656 395
PO Box 24434, Melbourne, VIC 3001

Recording and registering the complaint

Upon the closing of a complaint, the following information will be updated in the Complaints Register with the additional following details:

- The process of investigation that was undertaken to resolve the complaint.
- What the proposed resolution was.
- Whether this was accepted and how it was implemented.
- Whether or not the complaint has been resolved to the satisfaction of the complainant.
- The reason why the complaint was closed.

6.10 Management of Sub-contractors

All sub-contractors will be required to comply with this CEMP at all times and will have the same environmental management responsibilities as GLC. The Project Manager is directly responsible for ensuring that sub-contractors implement the appropriate environmental management requirements during construction. The Project Manager will ensure that the requirements of this CEMP are included in any commercial agreements or sub-contracts with sub-contractors.

Sub-contractors undertaking works that are beyond the scope of this CEMP are required to submit an *Environmental Work Method Statement* to the Project Manager (or delegate) for approval prior to commencing works.

6.11 Document Management

A document review process ensures that environmental documentation including this CEMP and other documents within the EMS are updated as appropriate for the construction facilities. These should be considered live documents and will be regularly reviewed and revised to reflect the progress of construction and ensure that the document addresses environmental issues, changes in legislation, policies, guidelines, and work practices.

- Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Health Safety and Environment Manager to prepare the revised documents. The revised document will then be issued to the Project Manager. Amendments to this CEMP shall be approved by the Project Manager and reviewed by Neoen prior to re-issue.

6.12 Records Distribution and Control

CEMP Document

This CEMP will be made available to all personnel and sub-contractors via the Project document control management system. An appropriate numbering system in the footer and on the front cover should be used to ensure that personnel are able to identify the most recent version of this document. One controlled hard copy of the CEMP and supporting documentation will be maintained by the Quality Manager at the Project office. The distribution list will be maintained by the Quality Manager. Registered copies will be distributed to:

- Project Manager
- Construction Managers
- Design Engineer
- Health Safety and Environment Manager
- Environment Manager
- Neoen Representative
- Neoen Environmental Representative
- Neoen Community Liaison Representative

All relevant personnel involved in the environmental management process will be expected to maintain a document control system for recording environmental management activities (i.e., incidents, complaints and monitoring activities).

Environmental Records

Environmental records will be maintained by the Quality and Environment Managers (Table 18). The results of any monitoring, inspections and audits will be maintained in a digital and paper-based register. In particular, those records required for any approvals, licenses or Conditions of DNF will be kept for a minimum four years and be available upon request to any authorised person (ASIC & EPA). All records must be stored both electronically and as a hard copy for audit purposes.

The following minimum information will be recorded and kept:

- The date(s) on which the monitoring, inspection or audit occurred
- The time(s) at which the monitoring, inspection or audit data was collected
- The point at which the monitoring, inspection or audit was taken
- The name of the person who conducted the sample(s).

Table 18: Environmental Record Location and Retention (ASIC & EPA)

Document	Storage Location	Period of Retention
Monitoring and Inspections	Electronic - Project Drive	4 years
Weekly site inspections	Electronic - Project Drive	4 years
Internal and external audit reports	Electronic - Project Drive	7 years
Incident and non-compliance reports	Electronic - Project Drive	7 years
Induction and Environmental training records	Electronic - Project Drive	7 years
Complaint and enquiry forms	Electronic - Project Drive	7 years
Register of CEMP review and version updates	Electronic - Project Drive	7 years

7 MANAGEMENT AND MITIGATION MEASURES

The GWF Stage 1 project has be broken down into a key series of environmental risk and management areas. Table 19 present the structure used in the CEMP to address these areas. As some of these areas will be addressed in Sub plans, these are referenced, and some key points described where relevant.

Table 19: The components used to present each

Item	Description
Aspect	The environmental threat
Related Activity	The project areas that drive this threat
Impact Risks	The associated risks with this environmental threat
Performance Criteria	The target outcome for the project
Corrective Actions	Corrective actions that will be taken if performance criteria are not met
Management and mitigation Measures	Management and mitigation measures required by the Development Approval and proposed to minimise risk.

7.1 Noise and Vibration *(DNF condition 25 to 29)*

Aspect

Noise and vibration from construction activity.

Related Activity

Site and infrastructure establishment, topsoil stripping and approved vegetation removal, construction traffic etc.

Impact Risks

Noise from construction works impacting the surrounding environment, including residential areas and sensitive wildlife.

Performance Criteria

1) Construction and operation noise within Environment Protection Noise Policy (2007).
2) Noise monitoring activities conducted regularly as per Development Approval Conditions.
3) Neighbouring landowners and locals not impacted by construction noise – designated operation hours adhered to in order to prevent annoyance, sleep disturbance and unreasonable interference.
4) WHS procedures in place to ensure contractors, subcontractors and visitors utilise hearing protection in proximity to construction areas where noise levels exceed safe levels.
5) Monitoring results (if relevant) from the PBTL MRP show no significant impact on PBTL populations

Corrective Actions

1) Any complaints regarding noise nuisance will be dealt with in a timely manner with the cause of the complaint investigated through consultation with the complainant. The results of the investigation will be reported, and the actions taken to 'close out' the complaint to the complainant.
2) An Incident Report Form will be filled out if any non-compliance is found.
3) All non-compliance will be reported immediately, and strategies implemented to reduce the likelihood of the incident occuring again.
4) Any corrective action (if relevant) proposed within the PBTL MRP

References to support actions

1) Development Application
2) Development Approval Conditions
3) Sonus. (2020). *Goyder South Renewable Energy Facility Environmental Noise Assessment (S5868C4).* Sonus, Adelaide SA.
4) Traffic Management Plan (Appendix N)
5) Noise Monitoring and Management Plan (Appendix M)
6) Bergland, B., Lindval, T. & Schwela, D. (1999). *Guidelines for Community Noise.* WHO, Geneva.
7) AS 2436-2010:2016. *Guide to noise and vibration control on construction, demolition, and maintenance sites.* Standards Australia.
8) *EPA SA. Environment Protection (Noise) Policy 2007*
9) *EPA Wind Farms Environmental Noise Guidelines 2009*
10) PBTL Monitoring and Research Plan (to be developed)

Table 20: Management and Mitigation measures addressing the impact of works on Noise and Vibration

Action	Description	When to implement	Party responsible

Construction Noise and Vibration Management Plan	• Construction Noise and Vibration Management Plan (CNVMP) will be prepared prior to construction commencing.
	• The CNVMP will be submitted to the Minister for Planning and Local Government for approval, prior to construction.
	• The Plan will address:
	  ○ Assessment criteria
	  ○ Existing noise
	  ○ Noise Impacts
	  ○ Mitigation measures
	  ○ Compliance management
	  ○ Monitoring
	• PBTL MRP will be developed within 12 months of, and in accordance with, the EPBC Approval Decision.
		Pre-construction	Project Manager

Traffic Management Plan	• The TMP will support noise management efforts and will include:
	  ○ Appropriate routes for light and heavy construction vehicles
	  ○ Appropriate parking areas
	  ○ Best practice regarding construction traffic in residential areas
	  ○ All other requirements specified by the Development Approval
	• Construction traffic will use agreed haul roads to travel to and from site, and approved parking areas.
		Pre-construction
		Construction
			HSE Manager
			Project Manager
			Construction Manager

Monitoring and Project Design	• Will comply with requirements of the Environment Protection (Noise) Policy 2007.
	• Prior to each construction works stage
	  ○ Monitoring to confirm compliance with the operational criteria based on the final wind turbine generator selection, layout and warranted sound power levels.
	  ○ Assessments in consultation with EPA must be submitted to the satisfaction of the Minister for Planning and Local Government (*DNF condition 26)*
	• During Construction
	  ○ Monitoring of noise levels at noise sensitive receivers must achieve standards defined by EPA (*DNF condition 25*)
		Pre-construction
		Construction
		Post-construction
			Construction Manager
			Environment Manager
			Project Engineer
			Neoen

Action	Description	When to implement	Party responsible

	• Post Construction Monitoring.
	  ○ Noise emitted by the selected wind turbine generators intended for installation must not include tones audible at the noise receivers when tested in accordance with the tonality test procedure defined in *IEC61400-11 (Ed 3.0) Wind turbines – Part 11 (DNF condition 27).*
	  ○ The absence of tones must be verified by results of post-construction at locality (Receiver H4) as shown in the Acoustic Report (June 2020) or such other localities to the satisfaction of the EPA. (*DNF condition 27*)
	  ○ Independent assessment of noise within 3 months of operation (*DNF condition 28*)
	• If the post-construction noise monitoring results reveal non-compliance
	  ○ Additional noise monitoring of other relevant noise sensitive receivers is required.
	  ○ Measures must be taken to ensure compliance. (*DNF condition 29*)		

Equipment Maintenance	• All vehicles and equipment will be operated and maintained to comply with regulatory standards, in order to control noise emissions. • Plant and equipment will be properly maintained and have noise limitation equipment installed as per manufacturer's specifications.	Construction	Construction Manager
Community Engagement	• Nearby residents will be notified of construction activities • Works carried out outside of specified hours will require an out of hours work application and community notification. • Community consultation may be necessary to establish an understanding of key requirements.	Construction	Construction Manager
Environmental Work Method Statement	• WHS procedures in place to ensure contractors, subcontractors and visitors utilise hearing protection in proximity to construction areas where noise levels exceed safe levels.	Construction	Construction Manager

7.2 Air Quality and Dust

Aspect

Air quality impacts during construction works.

Related Activity

Site establishment, topsoil stripping and approved vegetation removal, aggregate storage and stockpiles, temporary storage of chemicals, spoil, equipment, concrete mixing, making good of work areas, water provision and management.

Impact Risks

Dust from construction impacting the surrounding environment, including residential areas, water bodies and wildlife.

Performance Criteria

1) Dust particle levels meeting EPA requirements under Environment Protection (Air Quality) Policy 2016.
2) No infringement notices issued by the EPA in relation to dust and odour.

Corrective Actions

1) Any complaints regarding dust or odour pollution will be dealt with in a timely manner with the cause of the complaint investigated through consultation with the complainant.
2) The results of the investigation will be reported and the actions taken to 'close out' the complaint to the complainant.
3) An Incident Report Form will be filled out if any non-conformances are found.
4) All non-conformances will be reported in the Incident Reporting system, and strategies implemented to reduce the likelihood of the incident occuring again.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Southfront. (2021). Goyder Wind Farm Hydrological Study (21053-2). Southfront, Eastwood SA.
4) Dust Management Plan (Appendix D)
5) Traffic Management Plan (Appendix N)
6) EPA SA. Environment Protection (Air Quality) Policy 2016
7) AS/NZS 3580.19:2020. Method for sampling and analysis of ambient air, Method 19: Ambient air quality data validation and reporting. Standards Australia.

Table 21: Management and Mitigation measures addressing the impact of works on Air Quality and Dust

Action	Description	When to implement	Party responsible
Dust Management Plan	• A Dust Management Plan (DMP) will be provided to detail construction and operational measures to minimise dust and air pollution from the project. (*DNF condition 9*) • The DMP will be submitted to the Minister for Planning and Local Government for approval, prior to construction.	Pre-construction	Project Manager
Site Management	• The project works schedule, and facilities, will consider provision of natural barriers and prevailing wind directions to minimise movement of dust across the site. • All vehicles and equipment will be operated and maintained to comply with regulatory standards for exhaust emissions. • The height and orientation of stockpiles will be managed to minimise dust generation. • Loads of pavement materials, aggregate or other potential dust generation materials being transported will be covered or treated as per EPA requirements. • Stockpiles will be: ○ Sited in a leeward position to minimise effects from wind. ○ watered down if conditions require • Concrete batching areas will have: ○ Mixer loading areas, weigh bins and hoppers (if used) designed to reduce fugitive dust. ○ Batch hopper fitted with walls • Storage silos will be: ○ Fitted with a high-level alarm to guard against overfilling, which can contribute to dust generation ○ Fitted with appropriately sized fabric filter to prevent emissions when filling	Construction	Construction Manager
Dust Suppressant & Road Sealing	• Water trucks will be used as required to manage dust production on site. • Dust levels will be maintained to reflect the standard required by Environment Protection (Air Quality) Policy 2016. • Roadways will be unsealed hard surfaces designed to minimise dust where there will be frequent movement of vehicles.	Construction	Construction Manager

Action	Description	When to implement	Party responsible
WHS Procedures	• WHS procedures in place to ensure contractors, subcontractors utilise breathing protection (e.g., breathing apparatus) in proximity to construction areas where odour or fumes temporality exceed safe levels. • Stop work measure will be enacted for construction activities where odour or fumes exceed safe levels for extended periods. • WHS procedures in place to ensure contractors, subcontractors utilise breathing protection (e.g., face masks) in proximity to construction areas where dust temporarily exceeds safe levels. • Stop work measure will be enacted for construction activities where dust exceeds safe levels for extended periods.	Construction	Construction Manager

7.3 Flora and Fauna

Aspect

Clearance or disturbance of native flora and fauna, including threatened species.

Related Activity

Site preparation for all infrastructure, spoil heaps, laydown areas, concrete batching plants, site offices and transport/travel within the site.

Impact Risks

Unauthorised clearance of, or disturbance to, native vegetation or fauna, including threatened species or communities.

Performance Criteria

1) Clearance of or damage to native vegetation on the site or adjacent public roads for access during construction shall be restricted to that approved under the EBPC Approval Decisions and NVC Decision Notifications for the project, or as varied in accordance with those approvals.
2) All work activities proceed when staff and contractors are trained and have approval to proceed
3) Ecologically sensitive areas listed under *National Parks and Wildlife* (*NPW*) *Act 1972* and *Environment, Protection and Biodiversity* (*EPBC*) *Act 1999* will be avoided where possible, and only impacted within approved limitations.
4) Direct impacts to fauna will be avoided during construction works. Where impacts are unavoidable, the relevant management plan will be enacted (e.g., PBTL Management Plan; Wombat Management Plan).
5) Native vegetation will only be cleared where approvals allow.

Corrective Actions

1) Any exceedance of approved native vegetation clearance allowance must be reported to Neoen who will submit an amendment to the Native Vegetation Council (NVC) within 7 days. The report must include the details, extent and location of the exceedance.
2) Any death or significant, un-authorised disturbance to an EPBC listed species or threatened ecological community must be reported to Neoen who will report to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW). The initial notification to DCCEEW must be within 2 business days, and a more extensive report which includes correction actions to be taken, must be made within 10 days.
3) Any encroachment onto ecologically sensitive areas (no-go zones) must be reported to the Environment Manager immediately, for reporting requirements, investigation and development of corrective actions.
4) Any injured native fauna will be assessed by a suitably qualified ecologist/wildlife carer to determine appropriate treatment/response in a timely manner relative to species temporal and behavioural needs.
5) All non-compliances will be reported in the Incident Reporting system.
6) All non-compliances will be corrected immediately, and strategies implemented to reduce the likelihood of the incident occurring again.

Matters protected under the EPBC Act

Under the EPBC Act an approval is required from the Minister for any proposed action likely to have a significant impact on a matter protected by the EPBC Act. A risk assessment relating to threatened species and ecological

communities identified on the GWF Stage 1 protected under the EPBC Act is presented in Table 22. Risk assessment criteria and matrices are presented in Tables 23-26. A more detailed analysis of potential impacts will be presented in the Flora and Fauna Management Plan (FFMP) and in the management plans written specifically for the PBTL and INTG (EBS 2021).

Table 22: Management and Mitigation methods addressing the impact of works on native Flora and Fauna

Activity	Description	When to implement	Party responsible
Flora and Fauna Management Plan	• A Flora and Fauna Management Plan (FFMP) will be developed, to allow for detailed constraints mapping and mitigation treatments. The Plan will be developed in accordance with EPBC Referral Notice requirements, Native Vegetation Clearance Decision Notices and various management plans.	Pre-construction Construction	Project Manager
Approvals	• Any clearance or disturbance of a Matter of National Significance (MNES) i.e., TEC or Species protected under the *EPBC Act 1999* will be in accordance with the EPBC Referral Approval Decision(s). • Any clearance of native vegetation protected under the *NV Act 1972* will be carried out in accordance with the approvals issued by the Native Vegetation Council.	Pre-construction Construction	Neoen
Offsets	• All native vegetation clearance will be offset via the implementation of a Significant Environmental Benefit (SEB) Offset, as approved by the Native Vegetation Council, in accordance with any SEB Strategy submitted and approved by the Native Vegetation Council, prior to any clearance occurring. • An Offset Management Plan will be developed and submitted for approval by the Minister for DCCEEW, to address impacts to matters of National Significance, in accordance with the EPBC Approval Decision. • An on-site audit will be conducted to determine all direct clearance, whether complete clearance or partial clearance of native vegetation and the extent of any indirect impacts of the construction of the development.	Pre-construction Post-construction	Neoen
Design and Micrositing	• Clearance or damage to native vegetation on the site or adjacent to public for access during construction will be minimised, and not exceed approved clearance areas. • The final site design will aim for: ○ a 1km buffer to known Wedge-tailed Eagle nesting sites (active and inactive nests) which were found pre-development; ecological advisor to be consulted regarding subsequent nests identified during pre-construction through to operation. ○ a 20m buffer for all known PBTL burrow locations, and ○ a 20m buffer from active wombat burrows. • Where an unexpected find occurs during a Pre-Clearance Check (PCC) for PBTL or SHNW, Micrositing will be used to allow the appropriate distance from these locations. In the situation that micrositing	Pre-construction Construction	Project Manager Project Engineer

Activity	Description	When to implement	Party responsible
	to the extent of this buffer is not possible, a reduced buffer will be implemented, or a relocation based on the relevant management plans. • The reduced buffer for the PBTL will be determined based on the type of construction impact, the risk of secondary disturbance such as inundation or foot traffic and the extent that impacts can be avoided with exclusion fencing. It is expected that the buffer can be reduced to 10m in a case-by-case assessment by a qualified Ecologist.		
Induction	• Contractors and sub-contractors will undertake a CEMP Induction which includes: ○ Introduction to CEMP and relevant Sub-Plans, ○ Site constraints training ○ Mapping of areas with native flora and fauna to avoid ○ Basic identification of Pygmy Blue Tongue Lizard (PBTL), Peppermint Box trees and Iron-grasses prior to undertaking site activities. • Training will be provided prior to construction commencing, to inform their planning and activities, including movement around the site.	Pre-construction	Project Manager Construction Manager HSE Manager Environment Manager
Informed design change	• Any infrastructure micro-siting or changes to the location of permanent or temporary infrastructure, following the final design approval, will avoid significant native flora and fauna assets where possible. • If there are impacted fauna species management and extension of impact steps will need to be taken.	Pre-construction Construction	Project Manager Construction Manager Environment Manager
Exclusion Zones	• Sensitive flora and fauna sites (NOT subject to approved clearance) that occur within 20m of planned infrastructure will be marked as visible no-go zones for all construction activity, prior to works commencing near those areas. • A minimum 20m separation between the edge of significant native vegetation and infrastructure will be implemented. • In areas of approved clearance or disturbance of a TEC, the extent of disturbance will be delineated prior to vegetation clearing, by accurately marking out the limits of the work zone and vegetation to be retained, such as through appropriate marking.	Pre-construction Construction	Project Manager Construction Manager Environment Manager

Activity	Description	When to implement	Party responsible
	• In areas of approved clearance of native flora, the extent of disturbance will be delineated prior to vegetation clearing, by accurately marking out the limits of the work zone and vegetation to be retained. • Pygmy Blue-tongue Lizard (PBTL) burrows and known habitat areas will be marked as no-go zones, prior to construction works in those areas commencing. • Where wombats begin to become directly threatened or become a nuisance, management methods will be applied, to help keep wombats away from infrastructure whilst allowing free movement within their home range.		

Pre-works inspections	• Work zone delineation of infrastructure in the vicinity of sensitive areas will be carried out with the assistance of a qualified ecologist to ensure site constraints are properly marked.
	• An on-ground inspection will be conducted of the marking of sensitive zones, protection areas and approved clearance areas, prior to construction works occurring near those areas, as part of the works Permit System.
	• Any nesting fauna species that cannot remove themselves from the site must be re-located by a suitably qualified ecologist/wildlife carer
	• All WTG and construction sites with grassland areas will be surveyed prior to construction of hard stands and micro-siting away from any active PBTL burrows, where possible.
	• Where habitat trees or other key habitats are identified, a suitably qualified ecologist or wildlife carer will be present during vegetation clearance activities to safely capture any displaced reptiles or mammals and translocate them to similar habitats nearby, where practicable.
	• Excavations will be managed to minimise risks of fauna entrapment
	  ○ Minimise the time they are left open
	  ○ Cover open excavations during the construction phase of the project (e.g., trenches for cables) as soon as practicable.
	  ○ Undertake regular inspections
	• If excavations are left open overnight or for an extended period, they will be checked for native fauna each morning and at the end of afternoon shift by staff. In the event that native fauna become trapped in a construction area (i.e., excavation etc), a qualified ecologist or wildlife carer will be
		Pre-construction
		Construction
			Project Manager
			Construction Manager
			Environment Manager

Activity	Description	When to implement	Party responsible
	engaged to safely capture/remove the animal and translocate them to an appropriate area of habitat nearby.		
Fauna Species Management	• If impacts must happen where PBTL occur, and these impacts are approved by the EPBC approval, these PBTL must be relocated in accordance with the PBTL Management Plan. • The appropriate approvals and permits will be required for these activities. • Any approved PBTL re-location works will be implemented in consultation with the PBTL Recovery Team. • Where wombats begin to become directly threatened or become a nuisance, management methods will be applied, to help keep wombats away from infrastructure whilst allowing free movement within their home range.	Pre-construction Construction	Project Manager Environment Manager Qualified Ecologist
Environmental Audits and Monitoring	• Monitoring of vegetation clearance impacts against the approved clearing footprint will be included in monthly environmental audits. • Within the Operations phase, a breeding success monitoring program will be implemented for known raptor nests where they occur in close vicinity to construction activity.	Pre-construction Construction Operation	Project Manager Environment Manager Qualified Ecologist
Extension of impacts	• Any proposed clearance or disturbance of a TEC or Threatened species NOT approved by DCCEEW will be submitted to Neoen for referral under the EPBC Act, PRIOR to clearance occurring. Note that clearance includes depositing of spoil heaps or parking of heavy vehicles on vegetation. • Any proposed clearance of vegetation NOT approved by the Native Vegetation Council will be submitted to Neoen for submission to the NVC for approval, PRIOR to clearance occurring. Note that clearance includes depositing of spoil heaps, driving over or parking vehicles on native vegetation.		Project Manager Environment Manager NVC Accredited Consultant Neoen

Table 23: A risk assessment for Species and Communities listed as threatened under the EPBC Act.

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
Pygmy Bluetongue (*Tiliqua adelaidensis*)					
Clearance of PBTL habitat outside the approved clearance area	Unlikely	Moderate	Medium	• All Clearance will be kept within the defined impact areas. • No more than 8.04 ha (in Stage 1A) and 2.61 ha (in Stage 1B) of PBTL habitat will be cleared. • Pre-clearance checks of the development footprint and 10m beyond the footprint will be used to identify the location of populations of PBTLs. If found, the extent of the populations will be mapped and the micrositing process will be used to move the development footprint to 20m from the edge of the PBTL population, where possible. • In the situation that micrositing to the extent of this buffer is not possible, a reduced buffer will be implemented, or the PBTLs will be relocated prior to construction works, in accordance with the PBTL Management Plan. • The reduced buffer for the PBTL will be determined based on the type of construction impact, the risk of secondary disturbance such as inundation or foot traffic and the extent that impacts can be avoided with exclusion fencing. It is expected that the buffer can be reduced to 10m in a case-by-case assessment by a qualified Ecologist.	Low
Vehicles and/or machinery driving over PBTL habitat leading to degradation of PBTL habitat and injury to PBTLs	Unlikely	Moderate	Medium	• Vehicle movement will be restricted to existing or constructed tracks and WTG pads.	Low
Pits and man-made holes trapping PBTLs (e.g. electrical pits)	Unlikely	Moderate	Medium	• Construction methods for electrical cabling will avoid leaving open pits where possible. • If pits must remain open they will be checked every 24 hours to ensure that no wildlife is trapped in them.	Low

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
Altered grazing regimes (increased grazing, preferential grazing, reduction or loss of grazing, altered grazing times)	Unlikely	Moderate	Medium	• Where possible the landowners will restore the original grazing regimes across the development site.	Low
Sedimentation of PBTL burrows and/or PBTL habitat due to run-off from access tracks and other cleared areas	Unlikely	Moderate	Medium	• The Dust Management Plan (DMP) and Soil Erosion and Drainage Management Plans (SEDMP) provide a range of strategies that will be implemented as required to ensure that windblown sediment is minimised, and that stormwater is drained effectively to minimise water erosion and sedimentation.	Low
Introduction and/or spread of weeds from vehicles leading to reduced vegetation condition and PBTL habitat suitability	Unlikely	Moderate	Medium	• Weed mapping and hygiene strategies have been defined in the Flora and Fauna Management Plan (FFMP) to ensure that weeds will not be transported onto or spread across GWF-stage 1 site.	Low
Potential disturbance to PBTLs in close proximity to turbines from turbine noise and/or vibration (potential impacts are unknown)	Possible (?)*	Major (?)*	High(?)*	• As these impacts are unknown a PBTL Monitoring and Research Plan will be implemented to better understand the potential impacts. • Micrositing will aim to provide some distance from the development to known populations of PBTLs	High (?)*
Potential disturbance to PBTLs in close proximity to turbines from turbine blade shadow flicker impacts such as: • Potential increase in predation of PBTLs by birds of prey (due to PBTLs becoming accustomed to shadows); • potential decrease in PBTL body condition due to PBTLs basking less; and • potential decrease in breeding due to PBTLs taking refuge in their burrow.	Possible (?)*	Major (?)*	High (?)*	• As these impacts are unknown a PBTL Monitoring and Research Plan will be implemented to better understand the potential impacts. • Micrositing will aim to provide some distance from the development to populations of PBTLs	High (?)*

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
Division and isolation of PBTL sub-populations through tracks and WTG pads	Possible	Moderate	Medium	• All Clearance will be kept within the defined impact areas. • Pre-clearance checks will be used to identify the location of populations of PBTLs. If found, the extent of the populations will be mapped and the micrositing process will be used to move the development footprint to at least 20m from the edge of the PBTL population, where possible. • In the situation that micrositing to the extent of this buffer is not possible, a reduced buffer will be implemented, or the PBTLs will be relocated prior to construction works, in accordance with the PBTL Management Plan. • The reduced buffer for the PBTL will be determined based on the type of construction impact, the risk of secondary disturbance such as inundation or foot traffic and the extent that impacts can be avoided with exclusion fencing. It is expected that the buffer can be reduced to 10m in a case-by-case assessment by a qualified Ecologist.	Low
Chemical spills (e.g. fuel/diesel) causing degradation of PBTL habitat	Unlikely	Moderate	Medium	• The Waste Management Plan (WMP) defines the methods and requirements for chemical handling and storage on site to ensure that there is no risk to flora and fauna.	Low
Irongrass Natural Temperate Grassland (INTG)					
Clearance and other disturbance (eg stockpiling) within INTG habitat outside of the approved disturbance area	Possible	Moderate	Medium	• All Clearance will be kept within the defined impact areas. • No more than 12.67 ha in stage 1A of INTG will be cleared and none in Stage 1B. • All stockpiling and other disturbances will be kept within defined impact areas.	Low

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
				• Pre-clearance checks will be used to identify INTG communities. If found, they will be mapped and the micrositing process will be used to site infrastructure with least impact to the INTG	
Vehicles and/or machinery driving over INTG habitat leading to degradation of INTG communities	Unlikely	Moderate	Medium	• Vehicle movement will be restricted to existing or constructed tracks and WTG pads.	Low
Altered grazing regimes (incompatible grazing levels, preferential grazing, reduction or loss of grazing, altered grazing times)	Possible	Minor	Low	• Where possible the landowners will restore the original grazing regimes across the development site	Low
Introduction and/or spread of weeds from vehicles leading to reduced INTG vegetation condition	Possible	Moderate	Medium	• Weed mapping and hygiene strategies have been defined in the Flora and Fauna Management Plan (FFMP) to ensure that weeds will not be transported onto or spread across GWF-stage 1 site.	Low
Division and isolation of INTG communities through existence of vehicular access tracks	Likely	Moderate	High	• All Clearance areas will be kept within the defined impact areas.	Medium
Chemical spills (e.g. fuel/diesel) causing degradation of INTG habitat	Possible	Minor	Low	• The Waste Management Plan (WMP) defines the methods and requirements for chemical handling and storage on site to ensure that there is no risk to flora and fauna.	Low
Inappropriate fire regimes leading to reduce vegetation condition and extent	Possible	Moderate	Medium	• The Fire and Emergency Management Plan (FEMP) provides a number of Action Plans to prevent fire incidents as well as response strategies to respond to any fires on-site.	Low
Altered hydrology from infrastructure affecting INTG vegetation condition	Possible	Moderate	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively.	Low

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
Sedimentation of INTG habitat from construction activities (soil run-off), affecting INTG vegetation condition	Possible	Minor	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively to minimise water erosion and sedimentation.	Low
Peppermint Box Grassy Woodland (PBGW)					
Clearance and other disturbance (eg stockpiling) within PBGW habitat outside of the approved disturbance area	Unlikely	Moderate	Medium	• None of this habitat will be cleared.	Low
Vehicles and/or machinery driving over PBGW habitat leading to degradation of PBGW communities	Rare	Moderate	Low	• Vehicle movement will be restricted to existing or constructed tracks and WTG pads.	Low
Altered grazing regimes (incompatible grazing levels, preferential grazing, reduction or loss of grazing, altered grazing times)	Unlikely	Minor	Low	• Where possible the landowners will restore the original grazing regimes across the development site	Low
Introduction and/or spread of weeds from vehicles leading to reduced PBGW vegetation condition	Possible	Moderate	Medium	• Weed mapping and hygiene strategies have been defined in the Flora and Fauna Management Plan (FFMP) to ensure that weeds will not be transported onto or spread across GWF-stage 1 site.	Low
Division and isolation of PBGW communities through existence of vehicular access tracks	Rare	Moderate	Low	• All Clearance areas will be kept within the defined impact areas.	Low
Chemical spills (e.g. fuel/diesel) causing degradation of PBGW habitat	Possible	Minor	Low	• The Waste Management Plan (WMP) defines the methods and requirements for chemical handling and storage on site to ensure that there is no risk to flora and fauna.	Low

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
Inappropriate fire regimes leading to reduce vegetation condition and extent	Possible	Moderate	Medium	• The Fire and Emergency Management Plan provides a number of Action Plans to prevent fire incidents as well as response strategies to respond to any fires on-site.	Low
Altered hydrology from infrastructure affecting PBGW vegetation condition	Possible	Moderate	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively.	Low
Sedimentation of PBGW habitat from construction activities (soil run-off), affecting PBGW vegetation condition	Possible	Minor	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively to minimise water erosion and sedimentation.	Low
***Acacia spilleriana* (Spiller's Wattle)**					
Clearance and other disturbance (eg stockpiling) within Spiller's Wattle habitat outside of the approved disturbance area	Unlikely	Moderate	Medium	• None of this habitat species will be cleared.	Low
Vehicles and/or machinery driving over Spiller's Wattle habitat leading to degradation of PBGW communities	Unlikely	Moderate	Medium	• Vehicle movement will be restricted to existing or constructed tracks and WTG pads.	Low
Altered grazing regimes (incompatible grazing levels, preferential grazing, reduction or loss of grazing, altered grazing times)	Unlikely	Minor	Low	• Where possible the landowners will restore the original grazing regimes across the development site	Low
Introduction and/or spread of weeds from vehicles leading to reduced Spiller's Wattle vegetation condition	Possible	Moderate	Medium	• Weed mapping and hygiene strategies have been defined in the Flora and Fauna Management Plan (FFMP) to ensure that weeds will not be transported onto or spread across GWF-stage 1 site.	Low

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
Division and isolation of Spiller's Wattle population through existence of vehicular access tracks	Rare	Moderate	Low	• All Clearance areas will be kept within the defined impact areas.	Low
Chemical spills (e.g. fuel/diesel) causing degradation of Spiller's Wattle habitat	Possible	Minor	Low	• The Waste Management Plan (WMP) defines the methods and requirements for chemical handling and storage on site to ensure that there is no risk to flora and fauna.	Low
Inappropriate fire regimes leading to reduce vegetation condition and extent	Possible	Moderate	Medium	• The Fire and Emergency Management Plan provides a number of Action Plans to prevent fire incidents as well as response strategies to respond to any fires on-site.	Low
Altered hydrology from infrastructure affecting Spiller's Wattle vegetation condition	Unlikely	Moderate	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively to minimise water erosion and sedimentation.	Low
Sedimentation of Spiller's Wattle habitat from construction activities (soil run-off)	Possible	Minor	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively to minimise water erosion and sedimentation.	Low
***Dodonaea procumbens* (DP)**					
Clearance and other disturbance (eg stockpiling) within DP habitat outside of the approved disturbance area	Possible	Moderate	Medium	• Any unavoidable clearance of DP will not exceed 18 individuals in Stage 1A. • All stockpiling and other disturbances will be kept within defined impact areas.	Low

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
				• Pre-clearance checks will be used to identify DP populations. If found, they will be mapped and the micrositing process will be used to site infrastructure with least impact to DP.	
Vehicles and/or machinery driving over DP habitat leading to degradation of DP populations	Possible	Moderate	Medium	• Vehicle movement will be restricted to existing or constructed tracks and WTG pads.	Low
Altered grazing regimes (incompatible grazing levels, preferential grazing, reduction or loss of grazing, altered grazing times)	Unlikely	Minor	Low	• Where possible the landowners will restore the original grazing regimes across the development site	Low
Introduction and/or spread of weeds from vehicles leading to reduced DP population condition	Possible	Moderate	Medium	• Weed mapping and hygiene strategies have been defined in the Flora and Fauna Management Plan (FFMP) to ensure that weeds will not be transported onto or spread across GWF-stage 1 site.	Low
Division and isolation of PBGW communities through existence of vehicular access tracks	Unlikely	Moderate	Medium	• All Clearance areas will be kept within the defined impact areas.	Low
Chemical spills (e.g. fuel/diesel) causing degradation of DP habitat	Possible	Minor	Low	• The Waste Management Plan (WMP) defines the methods and requirements for chemical handling and storage on site to ensure that there is no risk to flora and fauna.	Low
Inappropriate fire regimes leading to reduce vegetation condition and extent	Possible	Moderate	Medium	• The Fire and Emergency Management Plan provides a number of Action Plans to prevent fire incidents as well as response strategies to respond to any fires on-site.	Low
Altered hydrology from infrastructure affecting DP vegetation condition	Possible	Moderate	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively.	Low

Potential Impact	Likelihood	Consequence	Risk Rating	Mitigation	Residual Risk Rating
Sedimentation of DP habitat from construction activities (soil run-off)	Possible	Minor	Medium	• The Soil Erosion and Drainage Management Plan (SEDMP) and the Stormwater Management Plan provide a range of strategies that will be implemented as required to ensure that stormwater is drained effectively to minimise water erosion and sedimentation.	Low

* NOTE: Limitations to this risk assessment are discussed in the FFMP

Table 24. Likelihood of risk occurring.

Likelihood	Description
Rare	May occur only in exceptional circumstances
Unlikely	Could occur at some time
Possible	Might occur occasionally
Likely	Will probably occur in most circumstances
Almost certain	Expected to occur in most circumstances

Table 25. Consequence of risk occurring to PBTLs.

Consequence	Description
Insignificant	No or negligible impact to PBTLs
Minor	Mild pain or distress to PBTLs
Moderate	Injury and/or mortality to five or less PBTLs
Major	Injury and/or mortality to more than five PBTLs
Catastrophic	Significant impact to PBTL population(s) in the Project Area (see *EPBC Act Significant Impact Guidelines* (DotE 2013)).

Table 26. Consequence of risk occurring to Flora.

Consequence	Description
Insignificant	No or negligible impact
Minor	Some impact that is recoverable without loss of community condition or individuals of a threatened species
Moderate	Isolated by substantial instances of damage to a vegetation community or threatened species population that could be recovered with intensive efforts
Major	Major loss of vegetation community or threatened species population that is not recoverable, and a risk of further loss exists
Catastrophic	Severe, widespread loss of vegetation community or threatened species population that is irrecoverable

Table 27. Risk assessment matrix.

Likelihood	Consequence					
		Insignificant	Minor	Moderate	Major	Catastrophic
	Almost Certain	Medium	High	High	Extreme	Extreme
	Likely	Medium	Medium	High	High	Extreme
	Possible	Low	Medium	Medium	High	High
	Unlikely	Low	Low	Medium	Medium	High
	Rare	Low	Low	Low	Medium	Medium

References to support actions

- Development Application
- Development Approval Conditions
- Engineering Plans (micro-siting)
- Flora and Fauna Management Plan (Appendix O)
- Department of Agriculture, Water and the Environment (2021). *Notification of Decision and Designated Proponent [EBPC Act Referral].* Australian Government, Canberra ACT (pending).
- Native Vegetation Council. (2016). *Policy for a Significant Environmental Benefit.* Government of South Australia, Adelaide.
- Native Vegetation Council. *Clearance Approval* (pending).
- Department of the Environment (2013). *Matters of National Significant: Significant impact guidelines 1.1 EPBC Act 1999.* Commonwealth of Australia, Canberra.
- EBS Ecology (2020). *Goyder South Hybrid Renewable Energy Facility: Flora and Fauna Assessment.* EBS Ecology, Torrensville SA.
- EBS Ecology (2021). *Overview of potential cumulative impacts associated with the Goyder South Hybrid Renewable Energy Facility.* EBS Ecology, Torrensville SA.
- EBS Ecology (2021). *Goyder South Hybrid Renewable Energy Facility: Justification for impacts to MNES.* EBS Ecology, Torrensville SA.
- EBS Ecology (2021). *Preliminary Pygmy Bluetongue Lizard Offset Proposal: Goyder South.* EBS Ecology, Torrensville SA.
- EBS Ecology (2021). Goyder: *Preliminary Pygmy Bluetongue Lizard Survey.* EBS Ecology, Torrensville SA.
- EBS Ecology (2021). *Goyder South Hybrid Renewable Energy Facility: Flora and Fauna Assessment Addendum.* EBS Ecology, Torrensville SA.
- EBS Ecology (2021). *Goyder South Hybrid Renewable Energy Facility: Draft Pygmy Bluetongue Lizard Management Plan.* EBS Ecology, Torrensville SA.
- EBS Ecology (2021). *Goyder South Hybrid Renewable Energy Facility: Draft Irongrass Natural Temperate Grassland Management Plan.* EBS Ecology, Torrensville SA.
- Duffy, A., Pound, L. & How, T. (2012). *Recovery Plan for the Pygmy Bluetongue Lizard Tiliqua adelaidensis.* Department of Environment and Natural Resources SA
- TSSC (Threatened Species Scientific Committee). (2009). *Conservation advice for Acacia spilleriana (Spiller's Wattle).* Australian Government, Canberra, ACT.
- Turner, J. (2012). *National Recovery Plan for Iron-grass Natural Temperate Grassland of South Australia ecological community.* Department of Environment and Natural Resources SA.
- Turner, J. (2012). *National Recovery Plan for Peppermint Box Eucalyptus Odorata Grassy Woodland of South Australia.* Department of Environment and Natural Resources SA.
- Government of SA Wildlife Management (Controller) Permit – Venomous Snakes (pending)
- Wildlife Health Australia. (2018). National Wildlife Biosecurity Guidelines - Version 1.0.

7.4 Cultural Heritage

Aspect

Disturbance or destruction of Aboriginal and European Cultural Heritage sites and objects.

Related Activity

Site and infrastructure establishment, topsoil stripping and approved vegetation removal, tidy work areas.

Impact Risks

Disturbance or destruction of cultural heritage sites and objects.

Performance Criteria

1) Ngadjuri heritage is respected and maintained on site as per the Aboriginal Heritage Act 1988 (amended 2016) and the Heritage Places Act 1993.
2) European heritage is respected and maintained on site as per the *Heritage Places Act 1993* and *The Burra Charter (2013).*
3) Contractors and subcontractors undertaking construction works will actively avoid all heritage sites identified and defined within the project area.

Corrective Actions

1) Any unauthorised destruction or disturbance of known or un-identified Aboriginal heritage sites or objects will lead to a STOP WORK and will be reported immediately Neoen who will report these to the Minister for Aboriginal Affairs and Reconciliation, for corrective action.
2) Any unauthorised destruction or disturbance of known or un-identified European heritage sites or objects will lead to a STOP WORK and will be reported immediately Neoen who will report to the SA Heritage Council, for corrective action.
3) An Incident Report Form will be filled out if any non-compliances are found.
4) All non-compliance will be reported immediately, and strategies implemented to reduce the likelihood of the incident occuring again.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Engineering Plans (micro-siting)
4) DIT (2021). Aboriginal Sites, Objects and Ancestral Remains Discovery Procedure. Environment and Heritage Technical Manual (EHTM) Attachment 2A.
5) DIT (2021) Non-Aboriginal Heritage Assessment Guideline. EHTM Attachment Part 8A
6) Independent Heritage Consultants. (2020). *Goyder Renewables Zone Desktop Heritage Assessment.* IHC, Adelaide SA.
7) Department of Premier and Cabinet (1988). Local Heritage Agreement: Guideline 3. Government of SA, Adelaide.
8) Australian Heritage Commission. Ask First: A guide to respecting heritage places and values.
9) Australia ICOMOS. (2013) The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance.

Table 28: Management and Mitigation measures addressing the impact of works on Cultural Heritage-listed sites and objects

Activity	Description	When to implement	Party responsible
Site Assessment	• Prior to the finalisation of the infrastructure layout, an on-site cultural heritage assessment will be carried out with a qualified Archaeologist and Ngadjuri representatives, for the identification of cultural heritage sites or objects that occur within the project area • Any sites or objects found during the on-site survey will be considered site constraints and included in site constraints mapping and avoided by all infrastructure. • Where a site cannot be avoided, approval for on-site works will be sought under the Aboriginal Heritage Act 1988 (section 23) or Heritage Places Act 1993 as required, prior to construction commencing in the area. • Construction contractors will have access to site constraints mapping for cultural heritage sites and objects prior to construction commencing, to inform their planning and activities.	Pre-construction	Neoen Project Manager Construction Manager Environment Manager
Exclusion Zones	• Cultural heritage sites and objects that occur within 20m of planned infrastructure will be marked as visible no-go zones for all construction activity, prior to works commencing near those areas. • Work zone delineation of infrastructure (e.g., site pegging) in the vicinity of cultural heritage sites/objects will be carried out with the assistance of a qualified archaeologist to ensure site constraints are protected. • Any infrastructure micro-siting or changes to the location of permanent or temporary infrastructure, post final design approval, will not encroach on cultural heritage sites/objects. • An on-ground inspection will be conducted of the marking of cultural heritage sites, prior to construction works occurring near those areas.	Pre-construction Construction	Neoen Project Manager Construction Manager Environment Manager
Discovery Procedure for unknown cultural heritage sites	• Should an unknown cultural heritage site/object be located during the course of on-site works, the contractor and Project Manager will follow the Discovery Procedures presented in Environment and Heritage Technical Manual (EHTM) attachments 2A and 8A. These procedures will be presented in site inductions. • Where un-known cultural heritage sites are discovered, all works will cease that may negatively impact on the site/object's integrity until it has been assessed by an appropriately qualified professional and dealt with appropriately.	Construction	All Personnel Project Manager Construction Manager Environment Manager
Setbacks	• A 200m setback will be maintained for the ruin located on the Worlds End Highway, near the intersection of Satchell Road.	Construction	Project Manager Construction Manager

Activity	Description	When to implement	Party responsible
			Environment Manager
Damage and Reinstalment	• Damaging or alterations to any features relating to ruins or dry-stone walls should be avoided • Where direct damage or alterations to dry stone walls cannot be avoided, post-construction reinstalment of any damage to stone walls will take place.	Construction	Project Manager Construction Manager Environment Manager

7.5 Weeds and Pests

Aspect

Weed and pest animal invasion of project properties.

Related Activity

Site and infrastructure establishment, topsoil stripping and approved vegetation removal, aggregate storage and stockpiles, imported substrate and aggregate fill and tidy work areas.

Impact Risks

Weed and pest invasion of project properties, affecting landowner pasture, crops or stock.

Performance Criteria

1) No new Declared Weeds or pests introduced due to the site via construction activities.
2) Active control of known weed populations will be undertaken where they occur in activity zones.
3) Weeds not spread further or between landholder properties.

Corrective Actions

1) Where new populations of Declared Weeds or pests emerge during the construction process, those populations are to be removed by the construction contractor, and sites monitored for re-emergence. The landowner, and where appropriate PIRSA, will be informed of the outbreak and control works being undertaken.
2) Where project infrasatructure increases pest abundance, those infestations are to be treated.
3) Implement effective treatments for weeds and/or pests in consultation with The Regional Council of Goyder.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Flora and Fauna Management Plan (Appendix O)
4) Wildlife Health Australia. (2018). National Wildlife Biosecurity Guidelines - Version 1.0.
5) PIRSA (Ed.) (2021). Manual for Roadside Weed Management in South Australia. Government of South Australia, Adelaide.
6) Biosecurity SA (Ed.) (2018). Weed Control Handbook for Declared Plants in South Australia. Government of South Australia, Adelaide.
7) EPA SA. (2017). Guidelines for Responsible Pesticide Use. EPA SA.
8) Pest Smart. (2021). Model code of practice for the humane control of foxes. Centre for Invasive Species Solutions.
9) Pest Smart. (2021). Model code of practice for the humane control of cats. Centre for Invasive Species Solutions.

Table 29: Management and Mitigation measures addressing the impact of works on Weeds and Pests

Activity	Description	When to implement	Party responsible
Hygiene procedures	• To prevent the introduction of new Declared Weeds or disease to the project area weed and disease hygiene procedures for all plant and vehicles entering the site will be developed and followed. See FFMP. • Raw materials such as rubble, gravel, sand etc brought onto site will be free of weeds. (*DNF condition 19*)	Construction	Construction Manager Environment Manager
Collection and disposal of Declared Weeds and waste	• Any Declared Weed materials gathered during hygiene procedures will be collected and disposed of according to the PIRSA Declared Plant Policy for each species. • Waste management measures will be implemented to avoid increased abundance of pests and opportunistic native fauna • All general waste receptacles will have secured lids to deter scavengers, e.g., cats and foxes. • All waste food will be removed from site or stored in secured bins.	Construction	Construction Manager
Exclusion Zones	• To actively manage known Declared Weed or disease populations, these will be mapped within the project area and included in constraints mapping. These sites should be avoided for all temporary infrastructure. • Where known sites of Declared Weeds cannot be avoided, the weed population will be treated to ensure project plant and equipment does not spread the weed to other parts of the project area.	Pre-construction Construction	Project Manager Environment Manager Construction Manager
Site Inspections	• Weed inspection will form part of the regular project auditing that is undertaken pre and during construction to identify any emerging Declared Weed populations. • Inspection sites will include stockpiles. • Areas likely to provide shelter will be regularly monitored for infestations and pest animals removed appropriately.	Construction	Construction Manager

7.6 Traffic, Access and Utility Infrastructure

Aspect

Access roads, construction traffic impacts on other road uses, road and bridge infrastructure, aviation operators and on the safety of walkers using the project site (Heysen Trail).

Related Activity

Transportation of project infrastructure and materials, transportation of site personnel, other construction traffic, infrastructure installation

Impact Risks

Physical wear of local infrastructure such as unpaved roads, bridges and intersections, increased road traffic risk for other road users, increased collision risk with heavy construction traffic for walkers of the Heysen Trail, collision risk of aviators with project infrastructure.

Performance Criteria

1) All state agency or utility-maintained infrastructure that are demolished altered, removed or damaged during construction of the project shall be reinstated to state agency or utility specifications.
2) No traffic accidents involving construction traffic during the project construction period.
3) No substantiated complaints received relating to construction traffic.
4) No substantiated complaints received by Heysen Trail Walkers.
5) No aviation accidents attributed to collisions with project infrastructure.

Corrective Actions

1) Where near-misses are reported a thorough investigation into the incident will be conducted and actions implemented to prevent the incident from recurring.
2) Where construction traffic scheduling is found to cause major local traffic issues, scheduling will be re-assessed immediately to rectify the problems.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Jacobs. (2020). Goyder Renewables Zone: Goyder South Traffic Impact Assessment. Jacobs, Adelaide SA.
4) Traffic Management Plan (Appendix N)
5) Safe Work Australia. (2014) Traffic Management: Guide for Construction Work.

Table 30: Management and Mitigation measures addressing the impact of works on Traffic and Access

Activity	Description	When to implement	Party responsible

Traffic Management Plan (*DNF condition 30*)	• A TMP, in consultation with the Department of Infrastructure and Transport (DIT) and the Goyder Regional Council.
	• The TMP will be submitted to the Minister for Planning and Local Government for approval, prior to construction.
	• As part of the TMP an accredited Road Safety Auditor will be engaged to undertake a safety audit of the route.
	• The TMP will include:
	  ○ Details on routes, roads and access points to be used for construction and operations traffic, with particular regard to the transport of over-dimensional wind farm components
	  ○ The types and number of vehicles servicing the development, including the construction traffic peaks.
	  ○ Identify access points, intersections and roads that require upgrading to carry project traffic.
	  ○ A route risk assessment for roads (including junctions/intersections) and identification of upgrade of roads and junctions/intersections required to safely accommodate all project vehicles
	  ○ A management schedule for the construction stage of the development to minimise impact on road users.
	  ○ Any structural improvement requirements
	  ○ A provision for annual road maintenance on local roads, to cover wear and tear from project vehicles
		Pre-construction	Project Manager
			Construction Manager

Construction Requirements and Standards	• Access to serve the development will be undertaken in accordance with Jacobs 2000 Goyder South Traffic Impact Assessment, Figure 6.3 (*DNF condition 31*):
	  ○ Site access points upgraded as recommended.
	  ○ All roadworks designed and constructed to the Austroads Guidelines and Australian Standards and to DIT's satisfaction.
	• Where road works on arterial roads are required for the project, a Developer Agreement will be entered with DIT regarding these works. (*DNF condition 32*)
		Pre-construction
		Construction
			Project Manager
			Construction Manager

Activity	Description	When to implement	Party responsible
	○ Contact DIT's Road Assets - Concept Planner, Mr Bonaventure Tan (08) 8648 5243, mobile 0417 767 452 or via email bonaventure.tan@sa.gov.au to discuss any technical issues regarding the required works. • The concrete batching and individual construction compounds required for the development will gain access to the arterial road network at locations deemed suitable by DIT. (*DNF condition 33*) ○ Any upgrades to facilitate safe access will be undertaken to DIT standards. • Any infrastructure within the road reserve that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the developer. (*DNF condition 34*) • Have a structural engineer verify the load-bearing capacities of bridge infrastructure that forms part of the proposed construction traffic network		
Infrastructure	• All state agency or utility-maintained infrastructure (i.e., roads, kerbs, drains, crossovers, cabling, pipe work etc) that are demolished altered, removed or damaged during construction of the project shall be reinstated to state agency or utility specifications. (*DNF Condition 17*)	Construction Post Construction	Project Manager Construction Manager Project Engineer
Project Design	• Clearance of or damage to native vegetation on the site or adjacent public roads for access during construction shall be minimised. (DNF Condition 24) • Batching plant layout plan including crushing and grinding activities (with details of raw material storage, mixing and delivery areas, wastewater treatment facilities, bunding, waste areas etc.) is required to receive a licence from the EPA.	Pre-construction Construction	Project Manager Construction Manager Project Engineer
Traffic redirection	• Heavy vehicle traffic will not pass-through Burra centre. • The TMP will consider the school bus routes in the region, and plan construction traffic routes outside of these, or at least avoid times that the bus routes will be utilised.	Construction Pre-construction	Construction Manager Project Manager
Communication with local residents	• A communication system will be established with local residents, to provide an avenue for traffic reports or complaints to be received. • The communication system will be used to clearly communicate when heavy vehicle use of the road network will commence and end.	Construction	Construction Manager
Signage	• Appropriate traffic signage will be put in place in accordance with traffic safety regulations.	Construction	Construction Manager

Activity	Description	When to implement	Party responsible
Mitigation of glare	• Any glare issues affecting the arterial road network shall be mitigated to the satisfaction of the Commissioner of Highways. (*DNF condition 35*)	Pre-construction Construction	Project Manager Construction Manager
Transmission lines *(DNF condition 36-39*)	• Any power lines installed over arterial roads will provide a minimum vertical clearance of 8 m. *(satisfying DNF condition 36*) • Where Transmission poles are required to be installed within road reserves, this will occur in consultation with Department of Infrastructure and Transport. *(DNF condition 36*) • Transmission poles shall be located on private property where possible. (*DNF condition 37*) • Where there is any undergrounding of the transmission line across the Goyder Highway, Worlds End Highway or the Barrier Highway, these works will be undertaken to the requirements and satisfaction of the Commissioner of Highways. (*DNF condition 38)* • A final transmission line diagram will be provided for each stage of the development with any new crossings/borings on, adjacent to, or under the arterial road network designed and constructed in consultation with DIT. (*DNF condition 39)*	Pre-construction Construction	Project Manager Project Engineer Construction Manager
Communication with Civil Aviation Authority (CASA) and Department of Defence	• To maintain civil aviation safety, once the wind farm layout has been finalised, and prior to construction commencing, the Civil Aviation Authority (CASA) and Department of Defence will be informed of the final locations of wind turbines and wind monitoring masts, as part of the requirement for Reporting of Tall Structures. • Any meteorological masts will be suitably marked with appropriate aviation orange/white strips, and if guy-wired, equipped with high-visibility cable balls on the outer guy wires. • Meteorological masts will be equipped with 5 m high visibility sleeves, one for each anchor and each outer guy wire. Each marking mechanism will be maintained to ensure their visibility and attachments to the wires are maintained. • Final locations and heights of Meteorological masts will be provided to CASA and the Aerial Agricultural Association of Australia.	Pre-construction Construction	Project Manager Construction Manager

7.7 Erosion and Stormwater Management *(DNF condition 9)*

Aspect

Erosion of landscapes within and adjacent the site, siltation of local waterways and effective capture and drainage of stormwater.

Related Activity

Site and infrastructure establishment, topsoil stripping and approved vegetation removal, aggregate storage and stockpiles, concrete mixing, water provision, make good work areas, Stormwater drainage.

Impact Risks

Soil erosion at the project site, waterways or adjacent lands. Excess siltation of local waterways through poor stormwater management. Stormwater flows impacting external roads and drains.

Performance Criteria

1) No significant erosion events caused by project activity.
2) No significant siltation of local waterways caused by project activity.
3) No contamination of site soils, surface water courses or groundwater in the vicinity of the Project area.
4) All erosion and sediment control measures installed in accordance with the requirements of the detailed Stormwater Management Plan and Construction Soil Erosion and Drainage Management Plan.

Corrective Actions

1) Maintenance records for erosion, sediment control, stormwater capture and drainage and effectiveness of measures will be reviewed.
2) Any non-conformances to be reported to the Construction Manager as soon as practical and an incident report will be completed.
3) All non-conformances will be corrected immediately and strategies implemented to reduce the likelihood of the incident occuring again.

References to support actions

- Development Application
- Development Approval Conditions
- Construction Soil Erosion and Drainage Management Plan (Appendix E)
- Stormwater Management Plan (Appendix F)
- Environment Protection (Water Quality) Policy 2015
- EPA Stormwater Pollution Prevention Code of Practice for the Building and Construction Industry
- International Erosion Control Association Australasia. (2008) *Best Practice Erosion and Sediment Control* (Books 1-3).

Table 31: Management and Mitigation measures addressing Erosion and Stormwater drainage

Activity	Description	When to implement	Party responsible

Construction Soil Erosion and Drainage Management Plan
 	
Stormwater Management Plan
 	
Dust Management Plan
	• A Construction Soil Erosion and Drainage Management Plan (CSEDMP) and Stormwater Management Plan will be developed and submitted to the Minister for Planning and Local Government, prior to the commencement of site works. (*DNF condition 9*)
	• The CSEDMP will include:
	  ○ Maps to be developed clearly showing the areas to be stripped and left in-situ, to restrict vegetation loss only to that approved
	  ○ The appropriate method for stripping, stockpiling, respreading and ameliorating soils
	  ○ The location of soil stockpiles and content (e.g. Topsoil type A, subsoil type B).
	  ○ Schedules of volumes for each material
	  ○ Expected after-use for each soil whether topsoil to be used on site, used or sold off site, or subsoil to be retained for landscape areas, used as structural fill or for topsoil manufacture.
	  ○ Contingency plan for severe rainfall events
	  ○ Management of long-term stockpiles or disturbed areas
	  ○ Identification of personnel responsible for supervising soil management.
	  ○ This plan will be considered in terms of the Dust Management Plan.
	• The SEDMP is required for the application for an EPA licence for the batching plant. It must meet EPA standards.
	• A Stormwater Management Plan will include:
	  ○ Design and implementation of drainage system to avoid sediment pollution and water flows impacting external facilities.
	  ○ A site drainage plan
	  ○ Construction site drainage will be designed to retain natural flow of unpolluted stormwater and minimise erosion and sediment runoff.
	  ○ Potentially contaminated water will be retained on site.
	  ○ Clean stormwater will be diverted to natural drainage lines.
		Pre-construction	Project Manager
			Construction Manager
			Project Engineer

Project Design *(DNF condition 40 & 41)*	• All stormwater generated will be appropriately collected and disposed of without entering or jeopardising the safety of adjacent arterial road network or any other adjacent roads • No stormwater from this development shall be discharged on-the surface to the adjacent roads. • Any existing drainage of the adjacent roads shall be accommodated in the development.	Pre-construction Construction	Project Manager Construction Manager Project Engineer

Activity	Description	When to implement	Party responsible

Site and Project Preparation	• Control measures for erosion and sedimentation:
	  ○ control measures installed where required prior to commencement of construction works.
	  ○ Materials for adaptive management during construction available (silt fencing, geotextile and hydro-mulch.
	• Stormwater drains:
	  ○ Drains installed
	  ○ Drainage monitoring system in place
	  ○ Flood response systems in place
		Pre-construction
		Construction
			Project Manager
			Construction Manager

Soil and sediment Management	• Soil handling:
	  ○ Care taken with weather and soil moisture conditions
	  ○ Using suitable machinery appropriately.
	  ○ Minimised, to maintain structure.
	  ○ Avoid incorporation of subsoil into topsoil when stripping.
	  ○ Topsoil will not be removed from below the spread of trees to be retained.
	• Erosion controls will be implemented to prevent and minimise the risk of any sediment from earthworks entering the stormwater system
	  ○ Areas of exposed soil will be protected, including stockpiles to prevent wind or water erosion.
	  ○ Stockpiles will be located away from watercourses and drainage lines.
	  ○ Stormwater will be diverted around stockpiles
	  ○ Any dewatering on site will be undertaken in a manner which prevents sediment entering stormwater drains and water course
	  ○ Sediment curtains, cofferdams or similar will be used to prevent suspended sediment movement during construction within water or areas likely to be inundated.
		Construction	Construction Manager

Vehicle and Equipment movements	• Tracked equipment will be used wherever possible to reduce compaction. • Confine movement of trucks or dumpers to designated temporary haul routes.	Construction	Construction Manager

Rehabilitation	• Site rehabilitation, and revegetation will be required to limit erosion. This will be carried out following sub-plans and management and mitigation measures tables:
	  ○ Rehabilitation Management Plan
	  ○ Decommissioning Management Plan
		Construction	Construction Manager

7.8 Site Rehabilitation *(DNF condition 7, 9 & 12)*

Aspect

Site Rehabilitation will occur progressively through the project, following the completion of each section of construction. Any infrastructure and materials that are not needed for operation or maintenance will be removed and all disturbed areas must be rehabilitated. This should occur as soon as possible and not left to the end of the project.

Related Activity

Stripping and stockpiling of topsoil, approved native vegetation removal, construction, stormwater management, end of construction, site rehabilitation.

Impact Risks

Ineffective re-instatement results in failed rehabilitation and increased risk of erosion and land degradation. Unwanted infrastructure or materials left on-site, impacting landowner use and increasing risk of little and pollution hazards.

Performance Criteria

1) Rehabilitation occurs as soon as possible following disturbance activities or as an area is no longer required.
2) Rehabilitation is not left until the end of construction.
3) Rehabilitation activities have reinstated or improved the environmental quality of disturbed environments.
4) Rehabilitation activities have removed all materials and infrastructure not needed for operation and maintenance.
5) Full use of the properties to be re-commenced to the extent agreed with the landowner after construction complete.
6) Ongoing monitoring results show successful remediation works.

Corrective Actions

1) Any non-conformances to be reported to the Project Manager as soon as practical.
2) An incident report to be completed and investigations undertaken for the development of appropriate corrective action.
3) Strategies to be developed to prevent the incident from recurrence.
4) Any incident affecting landowner operations are to be communicated to the landowner and corrective actions developed in consultation with the landowner.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Native Vegetation Clearance Approval Conditions
4) Rehabilitation Management Plan (post-construction) (Appendix H)
5) Flora and Fauna Management Plan (Appendix O)

Table 32: Management and Mitigation measures addressing Site Rehabilitation following construction.

Activity	Description	When to implement	Party responsible

Rehabilitation Management Plan (post construction)
 	
Flora and Fauna Management Plan
	• A Rehabilitation Management Plan (RMP) will be developed and submitted to the Minister for Planning and Local Government, prior to the commencement of site works. (*DNF condition 9*)
	• These plans will address targeted landscaping around wind farm and all buildings (except wind turbines generators) to mitigate visual impacts where practicable.
	• The plans will:
	  ○ Define specific methods for stabilisation and recovery of different areas.
	  ○ Identify the plant species to be seeded or planted, planting density, planting depths, irrigation methods fencing and other landscaping features.
	• The plans will include requirements associated with the Native Vegetation Clearance Approval
		Construction
		
		Post-construction
			Project Manager
			
			Construction Manager
			
			Environment Manager

Project Design	• All landscaping around buildings and facilities for visual amenity shall be reflected in the design plans.	Pre-Construction	Project Manager Design Engineer

Rehabilitation	• Shall be a continuing process over the life of the project and will occur as soon as possible following disturbance, taking advantage of natural rainfall (*DNF condition 7*). This will include:
	  ○ areas following completion of construction works,
	  ○ tracks and disturbed areas not to be used for ongoing access and maintenance.
	• Rehabilitation methods will continue throughout the construction period utilising techniques that allow for stabilisation and long-term revegetation despite the season.
	• Successful rehabilitation will reinstate to a quality that supports environmental and site health.
	• Areas of native vegetation, including road verges, which have been impacted during the construction phase will be:
	  ○ reinstated in accordance with the NVC Clearance Approval requirements.
	  ○ topsoil will be returned to approximately the same area of the roadside from which it was extracted.
		Construction
		
		Post-construction
			Project Manager
			
			Construction Manager
			
			Environment Manager

Activity	Description	When to implement	Party responsible
Monitoring	• Six-monthly inspections will be conducted within the first 3 years post re-instatement, to monitor the success of re-instatement works and allow for follow-up actions.	Post-construction	Neoen Qualified Ecologist

7.9 Storage and Handling of Waste and Hazardous Substances

Aspect

Stockpile and aggregate storage, chemical and fuel storage, spill response, waste management.

Related Activity

Site and infrastructure establishment, topsoil stripping and approved vegetation removal, aggregate storage and stockpiles, tidy work areas.

Impact Risks

Contamination of soil, water, or land from hazardous or other materials as a result of project activities.

Performance Criteria

1) No incidents of release of hazardous materials or chemicals to the environment.
2) Site works to comply with management of hazardous substances to ensure no negative impacts to human health
3) No incidents of waste littering around the project site.
4) All waste disposed of at appropriate facilities.
5) No burial of waste on-site (*DNF condition 20*).
6) Compliance with the Stormwater Management Plan.

Corrective Actions

1) Any non-conformances to be reported to the Project Manager as soon as practical.
2) An incident report to be completed and investigations undertaken for the development of appropriate corrective action.
3) Strategies to be developed to prevent the incident from recurrence.
4) Any incident affecting landowner operations are to be communicated to the landowner and corrective actions developed in consultation with the landowner.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Waste Management Plan (Appendix G)
4) Emergency Response Plan (Appendix I)
5) Environment Protection (Waste to Resources) Policy 2010
6) South Australia's Waste Strategy 2020-2025

Table 33: Management and Mitigation measures addressing Storage and Handling of Hazardous Substances.

Activity	Description	When to implement	Party responsible
Waste Management Plan	• A Waste Management Plan (WMP) will be submitted to the reasonable satisfaction of the Minister for Planning and Local Government, prior to the commencement of construction. (*DNF condition 9*) • The plan will: ○ Define management activities for hazardous material, Fuels and Site Waste ○ Identify the type and amount of waste to be generated during construction and procedures for the storage, reuse, recycling and/or appropriate disposal. ○ Identify the materials and storage requirements for all chemicals used on site or transported to site.	Pre-construction Construction	Project Manager Construction Manager
Waste Managements	• Components defined by the WMP will include: ○ Waste materials will be collected and securely stored on-site when awaiting disposal, to ensure it cannot be affected by wind, rain or scavenging fauna. ○ Waste will be managed and disposed of in accordance with relevant statutory requirements. ○ Food waste will be contained and removed from site regularly to prevent attracting of scavenging species. ○ Waste separation repositories will be provided on-site. ○ No waste will be buried on-site nor burnt on-site. (*DNF condition 20*)	Pre-construction Construction	Project Manager Construction Manager
Hazardous substance Containment	• Components defined by the WMP include: ○ Fuels, chemicals, lubricants and any other hazardous materials likely to cause environmental harm will be contained on-site in an appropriately bunded containment system, in accordance with EPA requirements. (*DNF condition 21*) ○ Safety Data Sheets for all hazardous materials used or stored on site, regardless of quantity, for the construction works, will be kept on site by the Contractor ○ Storage of materials will not be in areas at risk of inundation and will be away from any drainage channels and stormwater drains. ○ Decanting/pumping (with the exception of refuelling) of hazardous substances and materials will occur in bunded areas.	Pre-construction Construction	Project Manager Construction Manager

Activity	Description	When to implement	Party responsible
	○ When ponds and washout pits are required, the ponds will be lined to prevent leaching of liquids to groundwater resources. ○ Records will be maintained for the type and quantity of controlled waste for disposal.		
Containment and effective clean-up of spills	• An Emergency Response Plan will be developed prior to construction commencing, which will include management of a hazardous chemical spill • Spill kits will be located at each site where hazardous chemicals/fuels are being stored and appropriate personnel trained in the use of this equipment • Any spill event will be cleaned, and contaminated materials disposed of at an appropriate licensed facility • No contaminated materials will be buried on-site.	Pre-construction Construction	Project Manager Construction Manager

7.10 Water Quality

Aspect

Maintenance of water quality for local surface waters, ground water and drainage lines.

Related Activity

Site and infrastructure establishment, topsoil stripping and approved vegetation removal, aggregate storage and stockpiles, materials storage, water provision and tidy work areas.

Impact Risks

Contamination of local water resources by hazardous chemicals or siltation which can affect local communities and natural ecosystems.

Performance Criteria

1) No contamination of site soils, surface water courses or groundwater in the vicinity of the project area In line with Environment Protection Water Quality Policy 2015.
2) Compliance with the Stormwater Management Plan.

Corrective Actions

1) Any non-conformances to be reported to the Project Manager as soon as practical.
2) An incident report to be completed and investigations undertaken for the development of appropriate corrective action.
3) Strategies to be developed to prevent the incident from recurrence.
4) Any incident affecting landowner operations are to be communicated to the landowner and corrective actions developed in consultation with the landowner.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Construction Soil Erosion and Drainage Management Plan (Appendix E)
4) Stormwater Management Plan (Appendix F)
5) Waste Management Plan (Appendix G)
6) Water Affecting Activities Permit (pending)
7) Environment Protection (Water Quality) Policy 2015
8) EPA SA. (1999). Code of practice for the building and construction industry. EPA SA.

Table 34: Management and Mitigation measures addressing Water Quality.

Activity	Description	When to implement	Party responsible
Planning	• An Soil Erosion and Drainage Management Plan (SEDMP) and a Stormwater Management Plan (SMP) will be developed prior to construction which will outline the management of all soil works and water provision works to ensure the protection of local water resources • A Water Management Plan (WTMP) will be developed which will outline the management of all hazardous materials and project waste to ensure the protection of local water resources. This will be prepared prior to the construction and operation of the concrete batching plant.	Pre-construction	Project Manager
Setbacks	• At least 50m setback from water courses for concrete batching plants and all other permanent facilities will be maintained.	Pre-construction Construction	Project Manager Construction Manager
Use of local water resources	• Where groundwater or surface water extraction is required and approved, any conditions relating to the extraction permit will be adhered to • Chemical testing of any identified water source will be carried out to determine the suitability of the water for use in concrete mixing or dust suppression.	Construction	Construction Manager Project Manager

Stormwater Draining	• Stormwater will be managed appropriately to protect local water resources
	• Stormwater draining control will consider the following:
	  ○ Limiting site access to designated routes and controlled areas
	  ○ Locating and securing all stockpiles away from watercourses and concentrated water flow paths
	  ○ Assessing the impact of the proposed stormwater draining systems on the adjacent properties
	  ○ Consideration to existing underground services will be given when establishing the access tracks and construction site, and protection will be provided where required
	  ○ Drainage on construction of access road networks will be installed to mitigate potential effects, taking into consideration ephemeral watercourses
	• To control surface run-off entering and leaving the work area:
	  ○ Existing natural drainage paths and stormwater facilities must not be blocked or restricted.
		Pre-construction
		Construction
			Project Manager
			Construction Manager

Activity	Description	When to implement	Party responsible
	○ Runoff from unsealed areas at the construction site must not enter stormwater drains or natural drainage lines ○ Stormwater will be diverted around stockpiles		
Wastewater Management	• To maintain the quality of local water resources the project site will incorporate a wastewater management system and effectively operate the system. • The wastewater management system will be regularly inspected and maintained. • The wastewater collection and recycling system will be designed to collect contaminated water from: ○ Agitator washout ○ Truck washing ○ Yard washdown ○ Contaminated stormwater ○ Concrete batching area ○ Slump stand ○ Any other wastewater from the batching plant operation • Wastewater generated at the premises will not be discharged into any local water ways or onto land in a place from which it is reasonably likely to enter any waters. • Concrete agitator bowls and chutes will not be washed out to the stormwater system or roadways	Pre-construction Construction	Project Manager Construction Manager

7.11 Fire Risk and Emergency Response *(DNF condition 9 & 10)*

Aspect

Emergency response, including fire, flood, explosion, personnel injury and environmental damage.

Related Activity

All construction activities.

Impact Risks

Harm to personnel, local residents, property, infrastructure and ecological values.

Performance Criteria

1) Emergency response planning is kept up to date and accessible to all relevant personnel.
2) Emergency response training is undertaken regularly, and at least annually in collaboration with the CFS.
3) All contractors, subcontractors and visitors undergo a basic emergency induction.
4) All incidents and emergency events are responded to with the result of limiting harm to personnel, property, infrastructure or ecological values.

Corrective Actions

1) Any non-compliance to be reported to the Project Manager as soon as practical.
2) An incident report to be completed and investigations undertaken for the development of appropriate corrective action.
3) Strategies to be developed to prevent the incident from recurrence.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Emergency Response Plan (Appendix I)
4) Australasian Fire and Emergency Service Authorities Council. (2018). *Wind Farms and Bushfire Operations.* AFAC, Melbourne.
5) Safe Work SA
6) GLC Incident Reporting System

Table 35: Management and Mitigation measures addressing Fire Risk.

Activity	Description	When to implement	Party responsible
Fire and Emergency Response Plan *(DNF condition 10)*	• A Fire and Emergency Management Plan will be prepared prior to construction, in consultation with the SA Country Fire Service (CFS)and SafeWork SA. • The plan will be submitted to the reasonable satisfaction of the Minister for Planning and Local Government, prior to the commencement of construction. (*DNF condition 9*) • The plan will include the following aspects: ○ Emergency response procedures ○ Emergency vehicle access ○ Fire-fighting equipment and water supply ○ Vegetation management ○ Training for employees, contractors and local CFS volunteers ○ Hazardous materials spill management ○ Flooding ○ Wildlife Injury ○ Damage to power or services cables ○ Personal injury ○ Seismic activity ○ Reporting procedure ○ Incident investigation and corrective action procedure	Pre-construction	HSE Manager
Management Measures	• The appropriate firefighting measures and equipment required on-site will be determined in consultation with the CFS • The CFS and SES will be provided with information regarding the location of the equipment and measures implemented during construction • The CFS and SES will be provided with information regarding site access and access maps, for implementation into their systems.	Pre-construction	Project Manager
Site maintenance	• During construction, the area surrounding each turbine to a distance of 30m will be maintained as follows (subject the NVC Clearance Approvals): ○ Grass no higher than 100mm ○ Maintenance work such as mowing and tree pruning to be done before entering the Fire Danger Season, subject to NVC approval.	Construction	Construction Manager

Activity	Description	When to implement	Party responsible
	○ Leaf litter must be less than 20mm deep ○ No fires will be lit at any time, for any purpose. ○ Spark-arrestors will be installed on all vehicles and machinery powered by internal combustion engines ○ Vehicles will only be operated on approved roads and tracks for that class of vehicle. ○ Only diesel-powered vehicles will operate off of the constructed accessways at any time. ○ Welding will be undertaken under controlled conditions ○ On-site storage of flammable materials will be minimised ○ All vehicles will be equipped with compliant fire extinguishers • When conducting work using or generating intensive heat, the following will apply: ○ Use of a fire-resistant shield to prevent sparks or hot material from leaving the work area ○ Provision of a fireproof container for off-cuts ○ The work area around active grinding equipment (10m) and hot work source (1.5m) to be kept clear of flammable material or will be kept wet ○ Fire extinguishers and water tap to be made available in close proximity of the hot works area • During periods of High Fire Danger all hot work will be banned, and no permits will be issued (including explosives). • All CFS requirements regarding fire bans will be adhered to at all times.		

7.12 Contamination

Aspect

Stockpile and aggregate storage, chemical and fuel storage, spill response, waste management

Related Activity

Site and infrastructure establishment, concrete batching, materials storage and stockpiles, tidy work areas.

Impact Risks

Contamination of soil, water or land from hazardous or other materials as a result of project activities.

Performance Criteria

1) No incidents of release of hazardous materials or chemicals to the environment.
2) No incidents of waste littering around the project site.
3) Site works to comply with management of soil and water to ensure no negative impacts to human health.
4) All waste disposed of at appropriate facilities.
5) No burial of waste on-site.

Corrective Actions

1) Any non-conformances to be reported to the Project Manager as soon as practical.
2) An incident report to be completed and investigations undertaken for the development of appropriate corrective action.
3) Strategies to be developed to prevent the incident from recurrence.
4) Any incident affecting landowner operations are to be communicated to the landowner and corrective actions developed in consultation with the landowner.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Stormwater Management Plan (Appendix F)
4) Waste Management Plan (Appendix G)
5) Fire and Emergency Response Plan (Appendix I)
6) Environment Protection (Water Quality) Policy 2015

Table 36: Management and Mitigation measures addressing the potential contamination of Soil and Water

Activity	Description	When to implement	Party responsible
Containment of hazardous substances	• Fuels, chemicals, lubricants and any other hazardous materials likely to cause environmental harm will be contained on-site in an appropriately bunded containment system, in accordance with EPA requirements. • Storage of materials will not be in areas at risk of inundation and will be away from any drainage channels and stormwater drains. • Decanting/pumping (with the exception of refuelling) of hazardous substances and materials will occur in bunded areas.	Pre-construction Construction	Project Manager Construction Manager
Fire and Emergency Management Plan	• A Fire and Emergency Management Plan will be developed prior to construction commencing, which will include management of a hazardous chemical spill (*DNF commitment 10*)	Pre-construction	HSE Manager
Containment and effective clean-up of spills	• Spill kits will be located at each site where hazardous chemicals/fuels are being stored and appropriate personnel trained in the use of this equipment • Any spill event will be cleaned, and contaminated materials disposed of at an appropriate licensed facility • No contaminated materials will be buried on-site.	Pre-construction Construction	Project Manager Construction Manager

Containment of concrete batching plant waste	• A Temporary Batching Plant EWMS will be developed in accordance with EPA requirements. This statement will include:
	  ○ A layout plan of the proposed concrete batching plant and crushing and grinding activities
	  ○ Raw material storage
	  ○ Mixing and delivery areas
	  ○ Wastewater treatment facilities
	  ○ Bunding
	• Any temporary concrete batching facilities will be managed in accordance with an approved EPA license
	• The location of any temporary concrete batching plants will be sited outside of potential flood affected areas
		Pre-construction
		Construction
			Project Manager
			Construction Manager

Activity	Description	When to implement	Party responsible
	• When ponds and washout pits are required, such facilities will be lined to prevent leaching of liquids to groundwater resources • Any surplus and waste concrete generated by the batching plant will be minimised by using the material for construction purposes on site where possible		

7.13 Public Safety

Aspect

Construction traffic impacts on other road uses, safety of walkers using the project site (Heysen Trail).

Related Activity

Transportation of project infrastructure and materials, transportation of site personnel, other construction traffic, infrastructure installation

Impact Risks

Increased road traffic risk for other road users, increased collision risk with heavy construction traffic for walkers of the Heysen Trail, deterioration of road condition by construction traffic.

Performance Criteria

1) No traffic accidents involving construction traffic during the project construction period.
2) No substantiated complaints received relating to construction traffic
3) No substantiated complaints received by Heysen Trail Walkers

Corrective Actions

1) Where near misses are reported, a thorough investigation into the incident will be conducted and actions implemented to prevent the incident from recurring.
2) Where construction traffic scheduling is found to cause major local traffic issues, scheduling will be reassessed immediately to rectify the problems.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Traffic Management Plan (Appendix N)
4) Safe Work Australia. (2018). *Construction work code of practice.* Safe Work Australia.
5) Jacobs. (2020). *Goyder Renewables Zone: Goyder South Traffic Impact Assessment.* Jacobs, Adelaide SA.

Table 37: Management and Mitigation measures addressing public safety during construction

Activity	Description	When to implement	Party responsible

Planning
and
Traffic Management Plan
	• To ensure road and access infrastructure is brought to the standard to safely carry construction traffic, a detailed TMP will be prepared prior to construction, in consultation with the Department of Infrastructure and Transport (DIT) and the Goyder Regional Council.
	• The TMP will be submitted to the Minister for Planning and Local Government for approval, prior to construction.
	• As part of the TMP an accredited Road Safety Auditor will be engaged to undertake a safety audit of the route.
	• The TMP will include:
	  ○ Details on routes, roads and access points to be used for construction and operations traffic, with particular regard to the transport of over-dimensional wind farm components
	  ○ The types and number of vehicles servicing the development, including the construction traffic peaks.
	  ○ Identify access points, intersections and roads that require upgrading to carry project traffic.
	  ○ A route risk assessment for roads (including junctions/intersections) and identification of upgrade of roads and junctions/intersections required to safely accommodate all project vehicles
	  ○ A management schedule for the construction stage of the development to minimise impact on road users.
	  ○ Any structural improvement requirements
	  ○ A provision for annual road maintenance on local roads, to cover wear and tear from project vehicles
		Pre-construction	Project Manager

Site Access	• Access to the development will be designed based on the Traffic Impact Assessment recommendations (Jacobs 2020, Figure 6.3). Site Access Points to Goyder South, with these points upgraded as necessary.	Construction	Construction Manager

Activity	Description	When to implement	Party responsible
	• The concrete batching and individual construction compounds required for the development will gain access to the arterial road network at locations deemed suitable by DIT, and any upgrades will be undertaken to DIT standards		
Stormwater collection and disposal	• All stormwater generated will be appropriately collected and disposed of without entering or jeopardising the safety of adjacent arterial road network or any other adjacent roads	Pre-Construction and Construction	Design Engineer Construction Manager
Traffic redirection	• To ensure construction traffic does not endanger, nor cause traffic nuisance to local and regional road users, heavy vehicle traffic will not pass-through Burra centre. • The TMP will consider the school bus routes in the region, and plan construction traffic routes outside of these, or at least avoid times that the bus routes will be utilised.	Construction	Design Engineer Construction Manager Project Manager
Communication with local residents	• A communication system will be established with local residents to provide an avenue for traffic reports or complaints to be received. • The communication system will be used to clearly communicate when heavy vehicle use of the road network will commence and end.	Construction	Community Engagement Officer
Signage	• Appropriate traffic signage will be put in place in accordance with traffic safety regulations	Construction	Project Manager Construction Manager
Considerations for the safety of Heysen Trail walkers	• Where possible, the Heysen Trail route will be excluded from any construction traffic. • Discussions will continue with the Friends of the Heysen Trail to investigate the diversion of the affected section of the trail through Worlds End Gorge or other location, or at least temporarily divert the trail during the period of construction. • Where the trail cannot be diverted, and construction traffic must use a portion of the trail route, a strategy will be developed in consultation with the Friends of Heysen Trail to inform Heysen Trail users of construction activity and advise of any closure periods required for that section of the trail.	Pre-construction Construction	Project Manager Community Engagement Officer

Activity	Description	When to implement	Party responsible
Mitigation of glare	• Where glare issues are found to affect the arterial road network, these will be mitigated to the satisfaction of the Commissioner of Highways	Pre-construction Construction	Project Manager Construction Manager

7.14 Community Engagement

Aspect

Informing the local community of project activities and handling community grievances and enquiries.

Related Activity

All construction and operation activity.

Impact Risks

A lack of information or mishandling of grievances can cause distress to community members and harm public relations for the project.

Performance Criteria

1) Minimal complaints or grievances received by the local community.
2) All complaints and grievances dealt with to the satisfaction of the complainant and in a timely manner.
3) Regular project information distribution to the local community.
4) A community liaison officer remains accessible, during office hours, for community members.

Corrective Actions

1) Any complaints received about the project are to be reported and dealt with to the satifaction of the complainant and in a timely manner
2) Any non-conformances or incidents to be dealt with via the incident reporting and investigation process.

References to support actions

1) Development Application
2) Development Approval Conditions
3) Independent Heritage Consultants. (2020). *Goyder Renewables Zone Desktop Heritage Assessment.* IHC, Adelaide SA.

Table 38: Management and Mitigation measures to ensure the community is appropriately engaged and informed during construction.

Activity	Description	When to implement	Party responsible
Stakeholder Management Plan	• To ensure the effective engagement with the local community and provide a framework for receiving and managing community and stakeholder questions, comments and complaints.	Pre-construction Construction Operation	Project Manager

Design	• To minimise impacts to public spaces the following buffers will be allowed for within the design of the project
	  ○ A 3km buffer will be maintained between wind turbines and the Burra Creek Campground
	  ○ A 5.3km buffer will be maintained between wind turbines and the Burra town centre
	• A 3km buffer will be maintained between turbines and Burra Creek Gorge/Worlds End Gorge
		Pre-construction	Project Manager

Provide information to local community	• A Community Liaison Officer will be accessible to members of the public, during office hours, throughout the project's development, construction and operation.
	• Regular updates will be provided to the local community with regards to the project's progress and estimated timeframes for completion
	• The local community will be made aware of key restrictions, hazards or other events, such as:
	  ○ road closures or diversions,
	  ○ transportation of large infrastructure,
	  ○ emergencies that may impact the local community
	  ○ ways to access the Community Benefit Scheme.
		Construction
		Operation
			Neoen

Community benefits scheme	• To share of the financial benefits of the project with the local community the Community Benefits Scheme (CBS) will be established, as detailed in the Development Application, in consultation with the Regional Council of Goyder and relevant community members. • The CBS will commence at the time of commencement of the project's operation phase. • The CBS will be reviewed on an annual basis to adjust for inflation, review the utility of the scheme and to seek and consider community advice on how to improve the scheme.	Construction Operation	Neoen

Activity	Description	When to implement	Party responsible
Neighbour benefits scheme	• To share the financial benefits of the project with the adjacent project neighbours the Neighbour Benefits Scheme (NBS) will be established, as detailed in the Development Application, in consultation with the Regional Council of Goyder and relevant community members. • The NBS will commence at the time of commencement of the project's operation phase. • The NBS will be reviewed on an annual basis to adjust for inflation, review the utility of the scheme and to seek and consider community advice on how to improve the scheme.	Construction Operation	Neoen
Aboriginal community engagement	• Broad benefit-sharing opportunities for the local Ngadjuri Nation will be provided through the continued relationship between the Project Manager and RAW Recruitment to develop employment and training opportunities for peoples of the Ngadjuri Nation during project construction.	Pre-construction Construction	Project Manager
Protection of Aboriginal heritage	• Actions will be implemented as required to identify and protect Aboriginal heritage sites and objects.	Pre-construction Construction	Project Manager Construction Manager
Preserve and enhance amenity	• Where the purchase of land parcels adjacent the Burra Creek proceed, a communication strategy will be developed to inform the local community of the purchase and details of the access provided to the community. • Any access provided to the local community will be in accordance with the requirements of NVC Clearance Approval (should the land parcels be used successfully as a set-aside area within the NVC Clearance Approval process). • Discussions will continue with the Friends of the Heysen Trail to develop a solution to the potential loss of amenity for a section of the trail that runs adjacent to the proposed solar installation along Top Road. • Procedures will be put in place during construction to ensure the safety of any Heysen Trail Walkers through the project area during construction.	Pre-construction Construction	Neoen
Address community complaints	• A grievance procedure will be developed and include: ○ Complaints register	Construction Operation	Project Manager

Activity	Description	When to implement	Party responsible
	○ Investigation reporting ○ Follow-up and corrective action reporting ○ Resolution recording • The grievance procedure will ensure complaints are received, investigated and dealt with in a timely manner		

7.15 Visual Amenity

Aspect

Visual impact of the project to local residents and regional travellers.

Related Activity

Site preparation, establishment of buildings and infrastructure.

Impact Risks

Loss of visual amenity.

Performance Criteria

1) No complaints of visual impact from construction infrastructure
2) Adherence to requirements outlined in the Development Approval Notice

Corrective Actions

1) An Incident Report Form will be filled out if any non-conformances are found.
2) All non-conformances will be reported immediately, and strategies implemented to reduce the likelihood of the incident occurring again

References to support actions

1) Development Application
2) Development Approval Conditions
3) Green Bean Design (2020). *Goyder Wind Farm: Shadow Flicker and Blade Glint Assessment.* Green Bean Design, Austral NSW.

Table 39: Management and Mitigation methods addressing the visual impact of the project on local residents and regional travellers.

Activity	Description	When to implement	Party responsible
Project Design	• To mitigate visual impacts, complement surrounding rural landscapes, minimise obtrusive lighting or object affects to adjoining land or roads the following aspects will be included into the designing of the wind farm: ○ Targeted landscaping around buildings. See LRP (Appendix J). (*DNF Commitment 12*). ○ Buildings and associated structures should have exterior colours and finishes in non-reflective, neutral colours. (*DNF Commitment 16*). ○ The exposed footings of transportable buildings shall be enclosed around the perimeter of the buildings with brickwork or timber, to give the appearance of a permanent structure, other than where such buildings are temporary construction buildings, or such an enclosure is inconsistent with safety requirements. (*DNF Commitment 16*). ○ All electrical cables to and from WTGs will be placed underground ○ All external lighting on the site (excluding any navigational warning devices) will be designed and constructed to conform to AS4282-2019. (*DNF Commitment 22*). ○ No additional signs will be displayed upon the subject land other than those identifying windfarm access points and those shown on the approved plans. If any further signs are required, these will be the subject of a separate application to the Regional Council of Goyder. (*DNF Commitment 23)*.	Pre- Construction	Project Manager Project Engineer
Shadow Flicker Assessment	• Individual assessments will be conducted on the 12 dwellings that may be affected by Shadow Flicker • Where flicker is predicted to be significant, discussions will occur with the landowner to determine the best mitigation measures	Post-construction	Neoen
Consultation with landowners	• Follow-up with landowners will take place within 6 months of relevant turbines being commissioned, and any complaints will be dealt with appropriately	Post-construction	Neoen

7.16 Electromagnetic Interference

Aspect

Operation of local telecommunication facilities, communication equipment and household television reception.

Related Activity

Installation and operation of wind turbines.

Impact Risks

Interference to telecommunication facilities, communication equipment and household television reception.

Performance Criteria

1) Television monitoring program commenced pre-construction and completed post-construction
2) Any complaints from local residents regarding disruption to television interference are dealt with appropriately.
3) Any complaints from radio service providers or telecommunications license holders regarding disruption to these services are dealt with appropriately

Corrective Actions

1) Investigate any complaints to disruption of television, radio or telecommunication services/facilities, to the satisfaction of the complainant.
2) Where disruption to services is found to be caused by the operational windfarm, work with the service user or provider to develop a solution to resolve the interference.

References to support actions

- Development Application
- Development Approval Conditions
- Engineering Plans (micro-siting)

Table 40: Management and Mitigation methods addressing the impact of works on electromagnetic interference

Action	Description	When to implement	Party responsible
Design	• Design shall ensure no interference with existing telecommunication facilities or communication equipment (*DNF condition 8*). • Regarding Land Mobile Radio, a 100m buffer will be maintained between turbines and transmitter locations, when conducting any micro-siting	Pre-construction	Project Manager Project Engineer
Telecommunication facilities	• Telecommunications service license holders will be consulted with, where their services or infrastructure is predicted to be impacted (e.g. SA Water link #226752), to determine a suitable rectification plan.	Pre-construction	Project Manager
Monitoring	• Six months post-operation, a qualified consultant will conduct an assessment to determine any sources of High Frequency noise that could interfere with existing telecommunications facilities or communication equipment is present (*DNF conditions 8*). • Where monitoring confirms interruption or diminution of pre-development service levels, the implementation of any on or off-site mitigation measures for affected receivers shall be at the cost of the developer.	Operation	Neoen
Signal-level Survey	• The assessment will be undertaken by an independent television and radio monitoring specialist and include testing at locations to be determined by the specialist to engage the average television and radio reception strength to be determined. • If the post-construction assessment establishes an unacceptable increase in interference to reception as a result of the wind farm's operation, as determined by the independent specialist, measures to restore the reception to pre-construction quality will be undertaken.	Pre-construction Post-construction	Neoen
Complaint's investigation and development of mitigation actions	• Where complaints are received by service owners regarding a disruption to these services, an investigation will be conducted and mitigation actions developed, where it is found the wind farm has caused the interference.	Operation	Neoen

8 MANAGEMENT SUB PLANS

A series of sub-plans will be provided to support the CEMP and provide further detail regarding management, mitigation and compliance. These will be developed at the appropriate time and prior to the commencement of any activity of relevance to the sub-plan.

8.1 Dust Management Plan (Appendix D)

The Dust Management Plan outlines procedures to minimise air quality pollution associated with dust emission and the potential impacts on the environment and surrounding community. Airborne dust has the potential to impact the amenity of the surrounding area and the health of the local community, environment, and construction workers. In addition, it has the capacity to reducing the function of wind turbines in the operational phase. As such, innovative biological solutions have been incorporated into mitigation measures.

8.2 Soil Erosion and Drainage Management Plan (Appendix E)

The CSEDMP outlines the reasonable and practicable measures required on site to minimise short and long-term soil erosion and the adverse effects of above ground sediment transport within the broader project landscape.

8.3 Stormwater Management Plan (Appendix F)

The Stormwater Management Plan includes strategies to manage potential stormwater quantity and quality impacts caused by the wind farm development and operations. The Stormwater Management Plan should be read in conjunction with the CSEDMP in the development stage of the project. Key elements of the Stormwater Management Plan include:

- review of natural flow paths on the existing site.
- identification of potential stormwater quantity and quality impacts from the development footprint.
- conceptual design of appropriate stormwater management measures to mitigate potential impacts.
- description of the outcomes of the preliminary hydrology study including key assumptions and recommendations.

8.4 Waste Management Plan (Appendix G)

The WMP is necessary to appropriately manage the range of wastes which will be created during the construction and operational phases. The plan outlines the methods that are required to manage these wastes while minimising the production of waste materials and maximising reuse and recycling in line with the GLC Integrated Environmental Management Policy and industry best practice.

8.5 Rehabilitation Management Plan (Appendix H)

The Plan describes the activities required to meet the site stabilisation and rehabilitation objectives associated with the Development Approval. The plan provides a description of the methods to be used to stabilise and revegetate the landforms created across the GWF Stage 1. In addition, it outlines a program for monitoring rehabilitation success using appropriate indicators.

8.6 Fire and Emergency Management Plan (Appendix I)

The Fire and Emergency Response Plan has been developed to:

- Outline procedures for use in the event of an emergency created by a fire, hazardous material spill or other major incident.
- Protect the safety of employees, contractors, Emergency Service personnel and the public on the site and in any surrounding areas that may be affected.
- Protect the assets, property, and environment of Goyder South Wind Farm.
- Describe GLC's approach to planning for emergency situations.

8.7 Operational Environmental Management Plan (Appendix K)

The OEMP has been developed to document the way in which the wind farm operator manages ongoing activities that have the potential to impact the environment following the construction phase. The plan outlines the systems that identify and assess environmental risks including statutory and approval requirements, the controls and procedures that manage these risks, and measures to review the system including, its effectiveness and subsequent reporting to the various relevant authorities.

8.8 Decommissioning and Rehabilitation Plan (draft) (Appendix L)

The Decommissioning and Rehabilitation Plan (draft) must identify and address all relevant issues for decommissioning and rehabilitation of the project after its operation ceases. This includes a commitment that the operator will be responsible for all decommissioning and rehabilitation activities and expenses.

8.9 Construction Noise and Vibration Management Plan (Appendix M)

The Noise Monitoring and Management Plan outlines procedures to minimise and control potential noise and vibration impacts on the environment and local community, associated with the construction phase of the GWF Stage 1. Construction noise and vibration is expected to occur primarily from earthworks, building activities and movement of materials.

8.10 Traffic Management Plan (Appendix N)

A detailed TMP collates all of the existing reports and documentation relating to the impacts of the project on the surrounding road network and includes requirements for site access**.**

The plan also provides details on the following:

- Transport related Conditions of Approval.
- Traffic generated by construction of the wind farm.
- Mitigation and management measures (expanded from Section 7).
- Consultation undertaken with local and regional government authorities.

8.11 Flora and Fauna Management Plan (Appendix O)

The purpose of the FFMP is to describe how ongoing impacts associated with vegetation clearance, removal and disturbance to flora and fauna habitat from construction will be managed, in accordance with Development Approval Conditions and Commonwealth *EPBC Act 1999* Referral Approval Conditions, specific project-level approvals and all applicable guidelines and legislation relating to native flora, fauna and pest plant and pest animal management on the project site.

8.12 Stakeholder Management Plan (Appendix P)

The purpose of the SHMP is to describe the process for engagement with Stakeholders. This includes a process for receiving and managing comments, feedback and complaints from stakeholders.

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10 APPENDICES

Appendix A – Development Application Statement of Commitments

Appendix B – Project Coordinates

Appendix C – Engineering specifications for Goyder Wind Farm Stage 1

Appendix D – Dust Management Plan

Appendix E – Soil Erosion and Drainage Management Plan

Appendix F – Stormwater Management Plan

Appendix G – Waste Management Plan

Appendix H – Rehabilitation Management Plan

Appendix I – Fire and Emergency Response Plan

Appendix K – Operational Environmental Management Plan

Appendix L – Decommissioning and Rehabilitation Plan (draft)

Appendix M – Construction Noise and Vibration Management Plan

Appendix N – Traffic Management Plan – Phase 1 and Phase 2

Appendix O – Flora and Fauna Management Plan (In progress)

Appendix P – Stakeholder Management Plan

Appendix Q – Environmental Protection and Biodiversity Conservation Act Approval Decision Notification (Stage 1A)

Appendix R – Native Vegetation Clearance Approval Decision Notification (Stage 1A,1B and common assets)