

Goyder South Hybrid Renewable Energy Facility - Wind Farm 1A, 10km south Burra
EPBC Act Approval (2021/8958) Annual Compliance Report: 7 July 2022 - 6 July 2023

28 September 2023

Version 2 - Final

Prepared by EBS Ecology for NEOEN Australia Pty Ltd

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DECLARATION OF ACCURACY

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this decision.

Signed:



Full name: Louis de Sambucy

Position: Managing Director

Organisation: Neoen Australia Pty Ltd

Date: 29/09/2023

GLOSSARY AND ABBREVIATION OF TERMS

BAMP	Bird Adaptive Management Plan
CEMP	Construction Environmental Management Plan
ha	hectare(s)
INTG	Iron-grass Natural Temperate Grassland of South Australia
INTG TEC OMP	Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community Offset Management Plan
km	kilometre(s)
m	metre(s)
MW	Megawatts
MWh	Megawatt hours
NEOEN	NEOEN Australia Pty Ltd
OMP	Offset Management Plan
OTL	Overhead Transmission Line
PBTL	Pygmy Blue-tongue Lizard (<i>Tiliqua adelaidensis</i>)
PBTL OMP	Pygmy Blue-tongue Lizard Offset Management Plan
PBTL Research Plan	Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan
SA	South Australia
TEC	Threatened Ecological Community
WTG	wind turbine generator

DEFINITIONS ASSOCIATED WITH EPBC 2021/8958

Business day	means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the action.
Clear / Clearing	means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of vegetation.
Commencement of the action / Commence the action	<p>means the first instance of any specified activity associated with the action including clearing and construction. Commencement of the action/Commence the action does not include minor physical disturbance necessary to:</p> <ol style="list-style-type: none">undertake pre-clearance surveys or monitoring programs;install signage and /or temporary fencing to prevent unapproved use of the project area;protect environmental and property assets from fire, weeds and pests, including installation of temporary fencing, and use of existing surface access tracks;install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they have no impact on the protected matters; orundertaking geotechnical investigations if it causes only minor physical disturbance and is required well in advance of most site works to inform design.
Commission / Commissioning	means all activities, including turning of turbines, after the components of the first complete wind turbine are installed. The date on which commission/commissioning commences is the first date on which the blades of the first completed wind turbine start rotating.
Completion data	means an environmental report and spatial data clearly detailing how the conditions of this approval have been met. The Department's preferred spatial data format is shapefile .
Completion of the action	means the date on which all specified activities associated with the action have permanently ceased.
Compliance records	means all documentation or other material in whatever form required to demonstrate compliance with the conditions of approval in the approval holder's possession or that are within the approval holder's power to obtain lawfully.
Compliance report(s)	<p>means written reports:</p> <ol style="list-style-type: none">providing accurate and complete details of compliance, incidents, and non-compliance with the conditions and the plans;consistent with the <i>Annual Compliance Report Guidelines</i>, Commonwealth of Australia 2014;include a shapefile of any clearance of any protected matters, or their habitat, undertaken within the relevant 12 month period; andannexing a schedule of all plans prepared and in existence in relation to the conditions during the relevant 12 month period.

Construct / Construction	means the erection of a building or structure that is or is to be fixed to the ground and wholly or partially fabricated on-site; the alteration, maintenance, repair or demolition of any building or structure; preliminary site preparation work which involves breaking of the ground (including pile driving); the laying of pipes and other prefabricated materials in the ground, and any associated excavation work; but excluding the installation of temporary fences and signage.
Department	means the Australian Government agency responsible for administering the EPBC Act .
Environmental Offsets Policy	means the <i>Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy</i> , Commonwealth of Australia 2012, or any subsequent official revision produced by the Department .
EPBC Act	means the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth).
Goyder South Hybrid Renewable Energy Facility	is a renewable energy development located between Burra and Robertstown in the Mid North of South Australia, and represented by the area shown enclosed by the yellow line labelled 'Goyder south Hybrid Renewable Energy Facility' on the map at Attachment A . The Goyder South Hybrid Renewable Energy Facility includes, in addition to the action subject of this approval, the proposed actions described in the EPBC Act referrals 2021/8957, 2021/8959 and 2021/8960.
Impact (verb)	means any event which has the potential to, or does, impact on one or more protected matter .
Incident	means any event which has the potential to, or does, impact on one or more protected matter .
Independent audit	means an audit conducted by an independent and suitably qualified person as detailed in the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.
Iron-grass Natural Temperate Grassland of South Australia TEC	means the EPBC Act listed threatened ecological community (TEC) <i>Iron-grass Natural Temperate Grassland of South Australia</i> .
INTG TEC Management Plan	means the <i>Goyder South Hybrid Renewable Energy Facility INTG TEC Management Plan</i> prepared by EBS Ecology for NEOEN Australia Pty Ltd (version 3 of 28 June 2022 or subsequent revisions thereof).
Listed bird species	means all bird species listed under the EPBC Act as a listed threatened species or as a listed migratory species.
Monitoring data	means the data required to be recorded under the conditions of this approval.
Minister	means the Australian Government Minister administering the EPBC Act including any delegate thereof.

New or increased impact	means a new or increased environmental impact or risk relating to any protected matter , when compared to the likely impact of implementing the action management plan that has been approved by the Minister under conditions 3 and 4, including any subsequent revisions approved by the Minister , as outlined in the <i>Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals</i> , Commonwealth of Australia 2017.
Operation	means all activities that occur after the components of the final wind turbine generator are installed.
Plan(s)	means any of the documents required to be prepared, approved by the Minister , implemented by the approval holder and published on the website in accordance with these conditions (includes action management plans and/or strategies).
Project area	means the location of the action, represented by the area shown enclosed by the dashed magenta line labelled 'Wind Farm 1A' on the maps at Attachments A, B, C and D .
Protected matter(s)	means a matter protected under a controlling provision in Part 3 of the EPBC Act for which this approval has effect.
Pygmy Blue-tongue Lizard	is the EPBC Act listed threatened species <i>Tiliqua adelaidensis</i> .
Pygmy Blue-tongue Lizard habitat	means remnant native grassland or grassy woodland with a sparse overstorey of trees, represented in the map at Attachment C by the areas shown enclosed by the green line labelled as 'Pygmy Blue-tongue Lizard habitat'.
PBTL Management Plan	means the <i>Goyder South Hybrid Renewable Energy Facility PBTL Management Plan</i> prepared by EBS Ecology for NEOEN Australia Pty Ltd (version 3 of 28 June 2022 or subsequent versions thereof).
PBTL Recovery Team	means a collaboration of partners brought together by common objectives to develop and/or coordinate the implementation of a recovery plan, conservation advice or program for the Pygmy Blue-tongue Lizard .
SA development approval	means the approved development application number 422/V009/20 R1 (or subsequent approved revisions thereof) granted under section 131 (19) of the <i>Planning, Development and Infrastructure Act 2016</i> (SA) for the Goyder South Hybrid Renewable Energy Facility .
Sensitive ecological data	means data as defined in the <i>Sensitive Ecological Data – Access and Management Policy V1.0</i> , Commonwealth of Australia 2013.
Shapefile	means location and attribute information of the action provided in an Esri shapefile format. Shapefiles must contain '.shp', '.shx', '.dbf' files and a '.prj' file that specifies the projection/geographic coordinate system used. Shapefiles must also include an '.xml' metadata file that describes the shapefile for discovery and identification purposes.
Significant impacts	are impacts which are important, notable, or of consequence, having regard to their context or intensity, and assessed within the framework of the <i>Matters of National Environmental Significance – Significant Impact Guidelines 1.1</i> , Commonwealth of Australia 2013.

Suitably qualified bird expert	means a person who has relevant professional qualifications and at least 3 years of work experience designing and implementing plans for the conservation management of birds, who can identify bird species, and who can give an authoritative assessment and advice practices to avoid and mitigate impacts on birds using relevant protocols, standards, methods and/or literature. If the person does not have appropriate professional qualifications, the person must have at least 10 years of work experience identifying bird species, and designing and implementing plans for the conservation management of birds.
Suitably qualified researcher	means a person who has academic qualifications in ecology (or related subject areas) and training, skills and experience related to the nominated subject matter using the relevant protocols, standards, methods and/or literature, or a person who is studying to obtain academic qualifications related to the nominated subject matter (e.g., a university post- graduate student), provided they work under the supervision of a person who holds relevant academic qualifications and training, skills and substantial experience on the nominated subject matter.
Suitably qualified person	means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.
Trailing Hop-bush	is the EPBC Act listed threatened species <i>Dodonaea procumbens</i> .
Website	means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

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1 INTRODUCTION

Goyder Wind Farm 1 Pty Ltd received approval in accordance with the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for the Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra (Stage 1A) on 5 July 2022 (EPBC 2021/8958). NEOEN Australia Pty Ltd (NEOEN) is contracted by Goyder Wind Farm 1 Pty Ltd to ensure compliance with the approval, which is subject to specific conditions of approval (refer to Appendix 1 for the approval documentation). In particular, Condition 17 refers to annual compliance reporting, as follows:

17. *The approval holder must prepare a **compliance report** for each 12 month period following the date of **commencement of the action**, or otherwise in accordance with an annual date that has been agreed to in writing by the **Minister**. The approval holder must:*
- a. publish each **compliance report** on the **website** within 60 **business days** following the relevant 12 month period;*
 - b. notify the **Department** by email that a **compliance report** has been published on the **website** and provide the weblink for the **compliance report** within 5 **business days** of the date of publication;*
 - c. keep all **compliance reports** publicly available on the **website** until this approval expires;*
 - d. exclude or redact **sensitive ecological data** from **compliance reports** published on the **website**; and*
 - e. where any **sensitive ecological data** has been excluded from the version published, submit the full **compliance report** to the **Department** within 5 **business days** of publication.*

Note: Compliance reports may be published on the Department's website.

As such this document has been prepared to provide an annual compliance report for Stage 1A of the Goyder South Hybrid Renewable Energy Facility (EPBC 2021/8958), which commenced on 7 July 2022. This is the first annual compliance report for Stage 1A and applies to the first 12 months of the Project, from 7 July 2022 to 6 July 2023. During this timeframe, construction works have commenced and continued on site.

A summary of the approved action and compliance report details is provided in Table 1 on the following page.

Table 1. Summary of approved action and compliance report details.

EPBC Number	2021/8958
Project name	Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra (referred to as Stage 1A)
Approval holder	Goyder Wind Farm 1 Pty Ltd
Approval holder ACN / ABN	643 229 869
The approved action	To construct and operate up to 38 wind turbine generators and associated infrastructure as part of the Goyder South Hybrid Renewable Energy Facility, approximately 10 km south of Burra, South Australia.
Location of the Project	Approximately 10 km south of Burra, South Australia (refer to Figure 1).
Person accepting responsibility for the report	Mr. Louis de Sambucy
Date of commencement of the action	7 July 2022
Annual compliance report reporting period	7 July 2022 to 6 July 2023 (inclusive)
Date of preparation of this annual compliance report	28 September 2023

1.1 Project background

NEOEN is developing the Goyder South Hybrid Renewable Energy Facility (the Goyder South Project; the Project) between Burra and Robertstown in the Mid North of South Australia (SA). The Project combines wind, solar and energy storage in one integrated project and will be capable of delivering a steady, reliable, dispatchable output of power throughout the day and night. The Goyder South Project will generate more than 4,800,000 Megawatt hours (MWh) of power annually and is comprised of:

- A wind farm of up to 163 turbines with a capacity of up to 1200 Megawatts (MW), a maximum hub height of 121 metres (m), a maximum blade length of 78 m and an overall maximum height (tip height) of 199 m;
- A solar farm (across two sites) of up to 3000 hectares (ha) of solar panels with a capacity of up to 600 MW;
- An energy storage facility (lithium-ion battery) with a capacity of up to 900 MW / 1,800 MWh (2 hours);
- Associated infrastructure for connection to the electricity grid including three substations, access tracks, underground connection cabling and overhead transmission lines (OTLs);
- 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.

As the Goyder South Project will total up to \$3 billion in investment, NEOEN propose to implement the Project in stages, with each stage having its own legal entity, construction contracts and financing packages. An overview of each stage currently proposed for development, along with the corresponding EPBC approvals sought and obtained is outlined in Table 2.

Table 2. Current proposed stages and corresponding EPBC approvals for the Goyder South Project.

Project Stage / Proposed Action	Legal Entity	EPBC Referral Reference	EPBC Referral Decision	Date EPBC Approval Received
Stage 1A (38 WTGs and associated infrastructure)	Goyder Wind Farm 1A Pty Ltd	2021/8958	Controlled Action	5/07/2022
Stage 1B (37 WTGs and associated infrastructure)	Goyder Wind Farm 1B Pty Ltd	2021/8957	Controlled Action	15/08/2022
Common Asset (OTL and Substation)	Goyder Wind Farm Common Asset Pty Ltd	2021/8959	Controlled Action	22/08/2022
			Variation of conditions attached to approval	Variation received 19/12/2022
Battery	NEOEN Australia Pty Ltd	2021/8960	Not a Controlled Action	N/A

Each of the currently proposed stages of the Project are shown in Figure 1. Other components of the Goyder South Project, including the remaining wind farm areas, the two solar farms, overhead transmission lines and substations are considered to be potential future stages as they are not currently commercially viable and there is currently no immediate prospect of these components / stages proceeding to construction.

As stated previously this annual compliance report is for Stage 1A of the Goyder South Project.

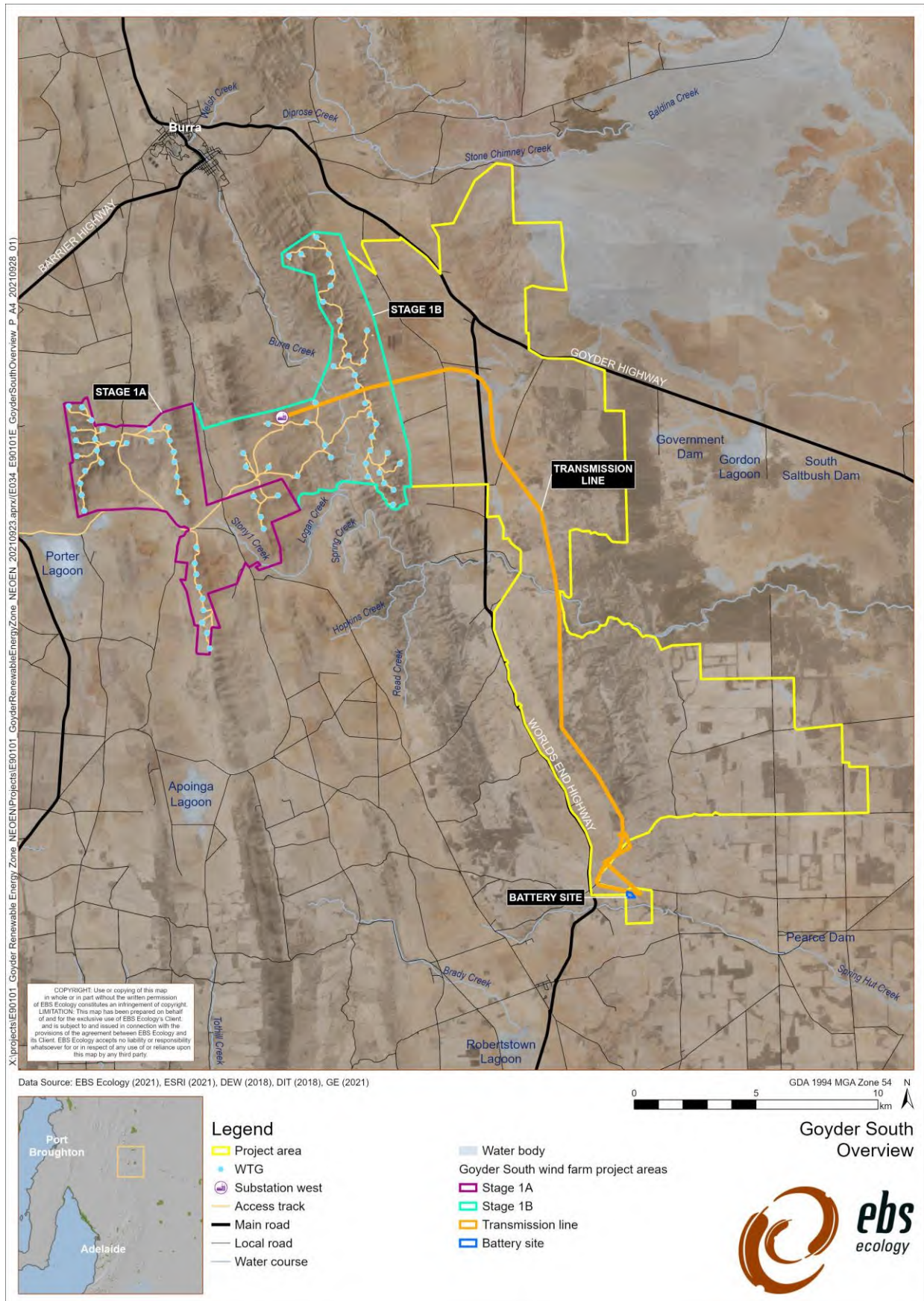


Figure 1. Current proposed stages of the Goyder South Project.

2 COMPLIANCE WITH CONDITIONS OF APPROVAL

Compliance with the conditions associated with the Stage 1A EPBC approval (EPBC 2021/8958) is presented in Table 3 on the following pages.

Except for one possible non-compliance, compliance has been achieved for all conditions of approval applicable to the timeframe of this annual compliance report (7 July 2022 to 6 July 2023), while several conditions of approval are not applicable to this annual compliance report.

Table 3. Conditions of approval associated with the Stage 1A EPBC approval (2021/8958).

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
Part A – Conditions specific to the action		
Construction/clearance limits		
1. To minimise impacts to protected matters, the approval holder must not:		
a. construct more than 38 wind turbine generators within the project area;	Compliant	The approval holder is constructing 38 wind turbine generators (WTGs) within the Stage 1A project area. Refer to Appendix 2 for a map showing the Stage 1A project area and WTGs being constructed.
b. clear outside the project area;	Compliant	The approval holder has not cleared outside the Stage 1A project area, except for clearance within the Stage 1B and Common Asset project areas , which the approval holder has separate EPBC Act approvals for (EPBC 2021/8957 and 2021/8959).
c. clear more than 8.04 ha of Pygmy Blue-tongue Lizard habitat within the project area;	Compliant	The approval holder has not cleared more than 8.04 ha of Pygmy Blue-tongue Lizard habitat within the Stage 1A project area. 5.60 ha of Pygmy Blue-tongue Lizard habitat was cleared in the timeframe applicable to this annual compliance report (7 July 2022 to 6 July 2023). Refer to Appendix 2 for mapping showing Pygmy Blue-tongue Lizard habitat within the Stage 1A project area and impact to it from construction of project infrastructure.
d. clear more than 18 individual plants of Trailing Hop-bush within the project area; and	Compliant	The approval holder has not cleared any individual plants of Trailing Hop-bush within the project area. Refer to Appendix 2 for mapping showing the Stage 1A project area and the Trailing Hop-bush plants within the project area.
e. clear more than 12.67 ha of the Iron-grass Natural Temperate Grassland of South Australia TEC within the project area.	Compliant	The approval holder has not cleared more than 12.67 ha of the Iron-grass Natural Temperate Grassland of South Australia TEC within the Stage 1A project area. 8.34 ha of Iron-grass Natural Temperate Grassland of South Australia TEC was cleared in the timeframe applicable to this annual compliance report (7 July 2022 to 6 July 2023). Refer to Appendix 2 for mapping showing Iron-grass Natural Temperate Grassland of South Australia TEC within the Stage 1A project area and impact to it from construction of project infrastructure.

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
Environmental Management Plans		
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.	Compliant	The approval holder has implemented the Construction Environmental Management Plan (CEMP) required under condition 9 of the SA development approval, since the action commenced on 7 July 2022. The approval holder intends to continue to implement the CEMP for the duration of construction.
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.	Compliant	The approval holder has implemented the PBTL Management Plan since the action commenced on 7 July 2022 and intends to continue to implement it for the duration of the EPBC approval.
4. 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.	Compliant	The approval holder has implemented the INTG TEC Management Plan since the action commenced on 7 July 2022 and intends to continue to implement it for the duration of the EPBC approval.
<i>Bird Adaptive Management Plan</i>		
5. The approval holder must submit to the Department for the Minister's approval a Bird Adaptive Management Plan (BAMP) within 12 months of the date of this approval. The environmental objectives of the BAMP are to effectively monitor for any impacts to listed bird species during the operation of the wind farm from (but not limited to) wind turbine strikes and, if any impacts are detected, to implement the technology, measures and procedures necessary to ensure that the impacts are accurately measured, reported and remain insignificant. The BAMP must: a. be consistent with the Environmental Management Plan Guidelines;	Compliant	The approval holder submitted a Bird Adaptive Management Plan (BAMP) to the Department for the Minister's approval on 5 July 2023, within 12 months of the date of the EPBC approval (5 July 2022) (refer to Appendix 3 for submission email). The BAMP was specifically prepared to satisfy the requirements of this condition of approval. The approval holder received feedback from the Department on the BAMP on 4 August 2023, which is after the timeframe applicable to this compliance report (7 July 2022 to 6 July 2023). The BAMP is currently being revised for submission to the Department for the Minister's approval. The approval holder expects to finalise the BAMP and submit to the Department for the Minister's approval within the timeframe of the second annual compliance report. The approval holder has not yet commissioned the Project.

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>b. specify relevant protected matters, and reference to the EPBC Act approval conditions to which the BAMP refers;</p> <p>c. include a table of commitments to achieve the BAMP's environmental objectives and a reference to where the commitments are detailed in the BAMP;</p> <p>d. include an assessment of risks to achieving the BAMP's environmental objectives and risk management strategies that will be applied;</p> <p>e. include a post-commissioning long-term wind turbine generator collision monitoring program to detect and manage potential impacts to listed bird species as a result of collision, which must:</p> <ul style="list-style-type: none"> i. contain details of the nature, timing and frequency of monitoring to inform progress against achieving the environmental outcomes and be sufficient to determine whether the BAMP is likely to achieve those environmental outcomes in adequate time to implement all necessary corrective actions; ii. include the findings of exhaustive pre-commissioning scavenger activity and searcher efficiency trials; iii. demonstrate how site-specific and species-specific risks and uncertainties (for example, findings of the pre-commissioning scavenger activity and searcher efficiency trials) have informed the design of the monitoring program; and iv. contain commitments to DNA test carcasses that cannot be otherwise identified by a suitably qualified bird expert, to undertake further periodic carcass persistence and searcher efficiency trials to check if assumptions need revision, to maximise turbine 		<p>The approval holder intends to commence implementing the approved BAMP before commissioning and continue implementing the approved BAMP until the completion of the action.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>collision detection in a timely manner, and to maximise carcass detection in a timely manner.</p> <p>f) include reporting commitments and timeframes for the provision of site-specific and species-specific information, which must:</p> <ul style="list-style-type: none"> i. contain annual turbine strike reports comprising raw data and strike notifications, survey methodologies, results of detection/persistence trials, environmental/meteorological conditions, and associated statistical analysis; and ii. contain estimation of annual mortality rate for each listed bird species comprising supporting evidence from case studies of listed bird species carcass size classes, results of persistence trials and searcher efficiency trials, annual probability of detection and monthly strike monitoring, and collision monitoring protocol and survey effort; and iii. contain species occurrence records prepared in accordance with the Guidelines for Biological Survey and Mapped Data. <p>g) include an adaptative management framework designed to:</p> <ul style="list-style-type: none"> i. ensure that no significant impacts to listed bird species are likely to occur as a result of the action; ii. clearly demonstrate the linkages between environmental outcomes, implementation and management measures, monitoring, reporting and investigations, and implementation of corrective actions to ensure the environmental outcomes will be achieved; iii. incorporate site-specific data collected through ongoing monitoring activities, and 		

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>to take into account changes to turbine risk ratings;</p> <p>iv. propose corrective actions if triggers are reached, such as bird and insect deterrents, low wind speed curtailments, wind turbine generator temporary or permanent shutdown, and/or permanent decommissioning of specific wind turbine generators; and</p> <p>h) commit that, if significant impacts to listed bird species occur, or are likely to have occurred, as a result of the action, the approval holder will, within 3 months of becoming aware of any actual or likely significant impact, submit to the Department for the approval of the Minister a revised BAMP responding to, and accompanied by, an evaluation report prepared by a suitably qualified bird expert of the effectiveness of the BAMP in preventing significant impacts to listed bird species.</p> <p>The approval holder must not commission unless the BAMP has been approved by the Minister in writing. The approval holder must commence implementing the approved BAMP before commissioning and continue implementing the approved BAMP until the completion of the action.</p>		
<p>Environmental offsets</p>		
<p><i>Offset Management Plan</i></p> <p>6. To compensate for residual significant impacts to the Pygmy Blue-tongue lizard and the Iron-grass Natural Temperate Grassland of South Australia TEC, the approval holder must submit to the Department for the Minister's approval an Offset Management Plan (OMP) within 6 months of the date of this approval.</p>	<p>Compliant</p>	<p>The approval holder submitted a Pygmy Blue-tongue Lizard Offset Management Plan (PBTL OMP) and an Iron-Grass Natural Temperate Grassland of South Australia Offset Management Plan (INTG TEC OMP) to the Department on 5 January 2023, within 6 months of the date of the approval (5 July 2022) (refer to Appendix 4 for submission emails).</p> <p>Each OMP was specifically prepared to satisfy the requirements of this condition of approval.</p> <p>Revised versions of the PBTL OMP and INTG TEC OMP were submitted to the Department on 12 June 2023.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>The OMP must:</p> <ol style="list-style-type: none"> a. be consistent with the Environmental Management Plan Guidelines; b. include a reference to the EPBC Act approval conditions to which the OMP refers; c. include summary information on the residual significant impacts to the Pygmy Blue-tongue Lizard and the Iron-grass Natural Temperate Grassland of South Australia TEC that will be compensated for by the offset(s); d. identify a suitable environmental offset(s) to compensate for residual significant impacts to the Pygmy Blue-tongue lizard and the Iron-grass Natural Temperate Grassland of South Australia TEC that meets the requirements of the Environmental Offsets Policy to the satisfaction of the Minister; e. include detailed baseline habitat quality information on the proposed offset(s); f. commit to achievable ecological benefits and provide timeframes for their achievement; g. detail how the offset(s) will be protected, and ecological benefits maintained; h. describe the monitoring program(s) to be implemented that will determine progress towards attainment of and maintenance of the ecological benefits at the proposed offset(s), which must include: <ol style="list-style-type: none"> i. measurable performance indicators to monitor attainment of the ecological benefits; ii. trigger values for corrective actions; and iii. the timing and frequency of monitoring to detect trigger values and changes in the performance indicators. i. include an assessment of risks to achieving the ecological benefit(s) and what risk management strategies will be applied to address these; 		<p>The approval holder received comments from the Department on each of the OMPs submitted to the Department on 5 September 2023, which is after the timeframe applicable to this compliance report (7 July 2022 to 6 July 2023).</p> <p>Each OMP is currently being revised for submission to the Department for the Minister's approval.</p> <p>The approval holder expects to finalise each OMP and submit to the Department for the Minister's approval within the timeframe of the second annual compliance report.</p> <p>The approval holder has not yet commenced commissioning of the Project.</p> <p>The approval holder intends to implement the approved OMPs for the periods specified in the approved OMPs.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>j. specify how and at what frequency offset(s) management results, monitoring program findings and assessments of ecological benefits will be reported to the Department and the public;</p> <p>k. propose corrective actions to ensure ecological benefits are attained or maintained, if trigger values are reached or performance indicators not attained;</p> <p>l. include links to referenced plans and applicable conditions of approval (including State approval conditions), if any; and</p> <p>m. specify and justify the period for which the OMP will be implemented.</p> <p>The approval holder must not commence commissioning until the OMP has been approved by the Minister in writing. The approval holder must implement the approved OMP for the period specified in the approved OMP.</p>		
<p>7. 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.</p>	Not applicable	<p>This document is the first annual compliance report for Stage 1A and covers the first 12 month period following the date of commencement of the action, from 7 July 2022 to 6 July 2023.</p> <p>While the OMPs (required under Condition 6) have not yet been approved by the Minister, 18 months since the date of EPBC approval (5 July 2022) has not yet lapsed. As such, this Condition is not applicable to this annual compliance report (7 July 2022 to 6 July 2023).</p>
<p>8. 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 12 months of the OMP approval date. The written evidence must identify the legal securing mechanism by which each offset site will be permanently protected for conservation.</p>	Not applicable	<p>This Condition is not applicable to this annual compliance report (7 July 2022 to 6 July 2023) as the OMPs have not yet been approved by the Minister.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>Note: The approval holder may choose to submit separate Offset Management Plans (OMPs) for the Pygmy Blue-tongue Lizard and the Iron-grass Natural Temperate Grassland of South Australia TEC instead of a single OMP.</p> <p>Note: The approval holder may choose to combine the OMPs required as conditions of approval for other proposed elements of the Goyder South Hybrid Renewable Energy Facility for the same protected matters. In this case, the approval holder must clearly demonstrate how the offset requirement(s) for each individual proposed element is being met and identify unique offset area(s) for each approved action geospatially.</p>		
<p><i>Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan</i></p> <p>9. 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 to the Department for the Minister's approval a Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan (PBTL Research Plan) within 12 months of the date of this approval.</p> <p>The PBTL Research Plan must:</p> <ol style="list-style-type: none"> be prepared by a suitably qualified researcher; be designed, primarily, to generate and analyse a decade of data to improve the understanding of the long-term impacts of wind turbine noise, vibration and shadow flickering on Pygmy Blue-tongue Lizard; clearly specify research objectives and methodologies; specify timelines and/or milestones for delivery of findings, reports and scientific paper publication; 	<p>Non-compliant</p>	<p>The approval holder did not submit a Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan within 12 months of the date of the approval (i.e., by 5 July 2023), as the approval holder is still preparing the Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan with a suitably qualified researcher. However, on 5 July 2023 the approval holder sought an extension to the timeframe associated with this condition of approval. Refer to Appendix 5 for correspondence regarding the request for an extension to the timeframe specified in this Condition.</p> <p>The approval holder did not receive a formal response from the Department regarding the request for an extension of time for submission of the PBTL Research Plan, within the timeframe applicable to this compliance report (7 July 2022 to 6 July 2023).</p> <p>Furthermore, the approval holder has not yet received a formal response from the Department regarding the request for an extension of time for submission of the PBTL Research Plan. The approval holder is in the process of following up on this request with the Department.</p> <p>The approval holder may be non-compliant with this Condition of approval, as the PBTL Research Plan has not been submitted to the Department within 12 months of the date of the approval. However, as outlined above, an extension to the timeframe for submission has been sought and the approval holder is still preparing the PBTL Research Plan.</p> <p>The PBTL Research Plan is expected to be submitted to the Department for the Minister's approval within the timeframe of the second annual compliance report (i.e., 7 July 2023 to 6 July 2024).</p> <p>The approval holder has not yet commissioned the Project.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>e. incorporate contemporary experimental design and methodologies including, but not limited to, those applied by the PBTL Recovery Team; and</p> <p>f. contain detailed costings and a commitment by the approval holder to fully fund at least 87 percent of the total cost of implementation of the PBTL Research Plan for at least 11 years.</p> <p>The approval holder must not commission unless the PBTL Research Plan has been approved by the Minister in writing.</p>		
<p>10. In relation to the PBTL Research Plan required under condition 9, the approval holder must provide to the Department:</p> <p>a. signed contracts exchanged between a suitably qualified researcher and the approval holder committing both parties to implement the PBTL Research Plan within 24 months of the date of this approval;</p> <p>b. reports describing the work undertaken as part of the PBTL Research Plan in each compliance report until the final assessment report of the findings of the PBTL Research Plan has been published;</p> <p>c. a detailed preliminary assessment report of the findings of the PBTL Research Plan within 90 months of the date of this approval; and</p> <p>d. a final assessment report of the findings of the PBTL Research Plan within 13 years of the date of this approval,</p> <p>and submit the findings of the PBTL Research Plan for publication in a relevant, reputable, peer-reviewed scientific journal.</p>	<p>Not applicable</p>	<p>The approval holder is currently still preparing the PBTL Research Plan required under condition 9.</p> <p>The approval holder intends to provide to the Department signed contracts exchanged between a suitably qualified researcher and the approval holder committing both parties to implement the PBTL Research Plan within 24 months of the date of the approval (5 July 2022), which equates to 4 July 2024. As such, the approval holder expects to achieve compliance with this condition by 4 July 2024.</p> <p>The approval holder intends to provide to the Department reports describing the work undertaken as part of the PBTL Research Plan in each compliance report until the final assessment report of the findings of the PBTL Research Plan has been published. The first report will be provided with the next annual compliance report (in September 2024).</p> <p>The approval holder intends to provide to the Department a detailed preliminary assessment report of the findings of the PBTL Research Plan within 90 months of the date of this approval (5 July 2022), which equates to 4 January 2030.</p> <p>The approval holder intends to provide to the Department a final assessment report of the findings of the PBTL Research Plan within 13 years of the date of this approval (5 July 2022), which equates to 4 July 2035.</p> <p>The approval holder intends to submit the findings of the PBTL Research Plan for publication in a relevant, reputable, peer-reviewed scientific journal.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
Part B – Standard administrative conditions		
Notification of date of commencement of the action		
11. The approval holder must notify the Department in writing of the date of commencement of the action and the date of commissioning within 10 business days after the date of commencement of the action and after the date of commissioning .	Compliant	NEOEN (on behalf of the approval holder) notified the Department in writing on 6 July 2022 of the date of commencement of the action , 1 business day prior to the date of commencement of the action (7 July 2022). Refer to Appendix 6 for correspondence regarding commencement of the action . Commissioning did not commence within the timeframe applicable to this annual compliance report (7 July 2022 to 6 July 2023).
12. If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister .	Not applicable	Commencement of the action occurred on 7 July 2022.
Compliance records		
13. The approval holder must maintain accurate and complete compliance records .	Compliant	The approval holder is maintaining accurate and complete compliance records .
14. If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act , and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.	Not applicable	The Department did not make a request in writing for electronic copies of compliance records within the timeframe applicable to this annual compliance report (7 July 2022 to 6 July 2023).
Submission and publication of plans		
15. The approval holder must: a. submit plans electronically to the Department for approval by the Minister ;	Compliant	The Construction Environmental Management Plan (CEMP), PBTL Management Plan , and INTG TEC Management Plan were provided to the Department as part of the Preliminary Documentation during the EPBC referral assessment process.

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>b. unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date:</p> <p>i. of this approval decision if the version of the plan to be implemented is specified in these conditions;</p> <p>ii. the plan is approved by the Minister if these conditions require that the plan be approved by the Minister; or</p> <p>iii. the plan is approved by a responsible State minister of State authority if the plan is required as part of the SA development approval;</p> <p>iv. a revised action management plan is submitted to the Minister or the Department if the plan is submitted in accordance with condition 23;</p> <p>c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and</p> <p>d. keep plans published on the website until the end date of this approval.</p>		<p>The CEMP is available on the Project's website at: https://goyderenergy.com.au/wp-content/uploads/2023/01/GSWF-ELECNOR-EHS-PLN-0005-Rev-13-Construction-Environmental-Management-Plan.pdf</p> <p>The PBTL Management Plan is available on the Project's website at: https://goyderenergy.com.au/wp-content/uploads/2023/01/PBTL_Man_Plan_Final_20220628.pdf</p> <p>The INTG TEC Management Plan is available on the Project's website at: https://goyderenergy.com.au/wp-content/uploads/2023/01/INTG_TEC_Man_Plan_Final_20220628.pdf</p> <p>Neither the PBTL OMP nor the INTG TEC OMP have yet been approved by the Minister. These plans will be uploaded to the Project's website within 20 business days of being approved by the Minister.</p> <p>The approval holder intends to keep these plans published on the Project's website until the end date of the EPBC approval.</p>
<p>16. The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan is prepared in accordance with the <i>Guidelines for biological survey and mapped data</i>, Commonwealth of Australia (2018), and submitted electronically to the Department in accordance with the requirements of the plan.</p>	<p>Not applicable</p>	<p>This document is the first annual compliance report for Stage 1A and covers the first 12 month period following the date of commencement of the action, from 7 July 2022 to 6 July 2023.</p> <p>Neither the PBTL OMP nor the INTG TEC OMP were approved by the Minister prior to the end of timeframe applicable to this annual compliance report.</p> <p>The approval holder will ensure that monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan (such as the PBTL OMP and INTG TEC OMP) is prepared in accordance with the <i>Guidelines for biological survey and mapped data</i>, Commonwealth of Australia (2018), and submitted electronically to the Department in accordance with the requirements of the plans.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
Annual compliance reporting		
17. The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:	Compliant	The action commenced on 7 July 2022. This document is the first annual compliance report for Stage 1A and covers the first 12 month period following the date of commencement of the action, from 7 July 2022 to 6 July 2023.
a. publish each compliance report on the website within 60 business days following the relevant 12 month period;	Compliant	This annual compliance report will be published on the Project's website within 60 business days following the first 12 month period, which equates to 29 September 2023. This annual compliance report will be available at the following website page: https://goyderenergy.com.au/documents/
b. notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication;	Compliant	NEOEN will notify the Department by email that this compliance report has been published on the Project's website and provide the weblink for the compliance report within 5 business days of the date of publication (which equates to 6 October 2023).
c. keep all compliance reports publicly available on the website until this approval expires;	Compliant	NEOEN will keep all compliance reports publicly available on the Project's website until the EPBC Act approval expires, which is 31 December 2057.
d. exclude or redact sensitive ecological data from compliance reports published on the website ; and	Compliant	Sensitive ecological data will be excluded or redacted from compliance reports published on the Project's website .
e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.	Compliant	The full compliance report containing sensitive ecological data will be submitted to the Department within 5 business days of publication (which equates to 6 October 2023).
Note: Compliance reports may be published on the Department's website.		Noted.

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
Reporting non-compliance		
<p>18. The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> a. any condition which is or may be in breach; b. a short description of the incident and/or non-compliance; and c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available. 	Compliant	<p>On Tuesday 20 December 2022, the approval holder notified the Department in writing of a potential incident that occurred on Friday 16 December 2022. The notification was given as soon as practicable and no later than 2 business days after becoming aware of the potential incident. The notification included a short description of the potential incident, location information, date and time of the potential incident. Refer to Appendix 7 for the initial notification of the potential incident.</p>
<p>19. The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder. 	Compliant	<p>On Friday 13 January 2023, the approval holder provided to the Department further details of the potential incident that occurred on Friday 16 December 2022. Although the timeframe of 10 business days after becoming aware of the incident, for providing further details was not met, the approval holder liaised with the Department to seek an extension for submission of the incident report to 13 January 2023 (due to the Christmas and New Year holiday period), which the Department accepted. Refer to Appendix 8 for correspondence between the approval holder and the Department regarding extension for submission.</p> <p>Information provided to the Department included findings of an investigation, corrective actions undertaken, potential impacts of the incident and discussion on remedial action. Refer to the Incident Report in Appendix 9 for more detail.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
Independent audit		
20. The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister .	Not applicable	No independent audit of compliance with the conditions has been requested in writing by the Minister .
21. For each independent audit , the approval holder must: <ul style="list-style-type: none"> a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria. 	Not applicable	Not applicable for this annual compliance report.
22. The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not applicable	Not applicable for this annual compliance report .
Revision of action management plans		
23. The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act . If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	Not applicable	This document is the first annual compliance report for Stage 1A and covers the first 12 month period following the date of commencement of the action, from 7 July 2022 to 6 July 2023. The approval holder did not apply to the Minister for a variation to an action management plan approved by the Minister , within the first 12 month period following the date of the commencement of the action (7 July 2022 to 6 July 2023), so this condition of approval is not applicable.


Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
<p>24. The approval holder may choose to revise an action management plan approved by the Minister under conditions 3 and 4, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.</p>	<p>Not applicable</p>	<p>This document is the first annual compliance report for Stage 1A and covers the first 12 month period following the date of commencement of the action, from 7 July 2022 to 6 July 2023. The approval holder did not revise an action management plan approved by the Minister, within the first 12 month period following the date of the commencement of the action (7 July 2022 to 6 July 2023), so this condition of approval is not applicable.</p>
<p>25. If the approval holder makes the choice under condition 24 to revise an action management plan without submitting it for approval, the approval holder must:</p> <ul style="list-style-type: none"> a. notify the Department in writing that the approved action management plan has been revised and provide the Department with: <ul style="list-style-type: none"> i. an electronic copy of the RAMP; ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP; iii. an explanation of the differences between the approved action management plan and the RAMP; iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. 	<p>Not applicable</p>	<p>Not applicable for this annual compliance report.</p>

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
b. subject to condition 27, implement the RAMP from the RAMP implementation date.		
26. The approval holder may revoke their choice to implement a RAMP under condition 24 at any time by giving written notice to the Department . If the approval holder revokes the choice under condition 24, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 24.	Not applicable	Not applicable for this annual compliance report.
27. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact , then: a. condition 24 does not apply, or ceases to apply, in relation to the RAMP; and b. the approval holder must implement the action management plan specified by the Minister in the notice.	Not applicable	Not applicable for this annual compliance report.
28. At the time of giving the notice under condition 27, the Minister may also notify that for a specified period of time, condition 24 does not apply for one or more specified action management plans.	Not applicable	Not applicable for this annual compliance report.
Note: conditions 24, 25, 26 and 27 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval.		Noted.

Condition of approval	Is the project compliant with this condition?	Evidence / Commentary
Completion of the action		
29. Within 30 days after the completion of the action , the approval holder must notify the Department in writing and provide completion data .	Not applicable	The action has not yet been completed, so this condition of approval is not applicable for this annual compliance report .

3 APPENDICES

Appendix 1. EPBC Act approval documentation



Australian Government
Department of Climate Change, Energy,
the Environment and Water

APPROVAL

Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra SA (EPBC 2021/8958)

This decision is made under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (the EPBC Act). Note that section 134(1A) of the EPBC Act applies to this approval, which provides in general terms that if the approval holder authorises another person to undertake any part of the action, the approval holder must take all reasonable steps to ensure that the other person is informed of any conditions attached to this approval, and that the other person complies with any such condition.

Details

Person to whom the approval is granted (approval holder)	Goyder Wind Farm 1 Pty Ltd
ACN of approval holder	643 229 869
Action	To construct and operate up to 38 wind turbine generators and associated infrastructure as part of the Goyder South Hybrid Renewable Energy Facility, approximately 10 km south of Burra, South Australia [See EPBC Act referral 2021/8958].

Approval decision

My decisions on whether or not to approve the taking of the action for the purposes of each controlling provision for the action are as follows.

Controlling Provisions


Listed Threatened Species and Communities	
Section 18	Approve
Section 18A	Approve

Listed migratory species	
Section 20	Approve
Section 20A	Approve

Period for which the approval has effect

This approval has effect until 31 December 2057.

Decision-maker

Name and position	Kylie Calhoun Assistant Secretary Environment Assessments West (WA, SA, NT) Branch
Signature	
Date of decision	5 July 2022

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Figure 2. EPBC Act Approval (page 1 of 17).

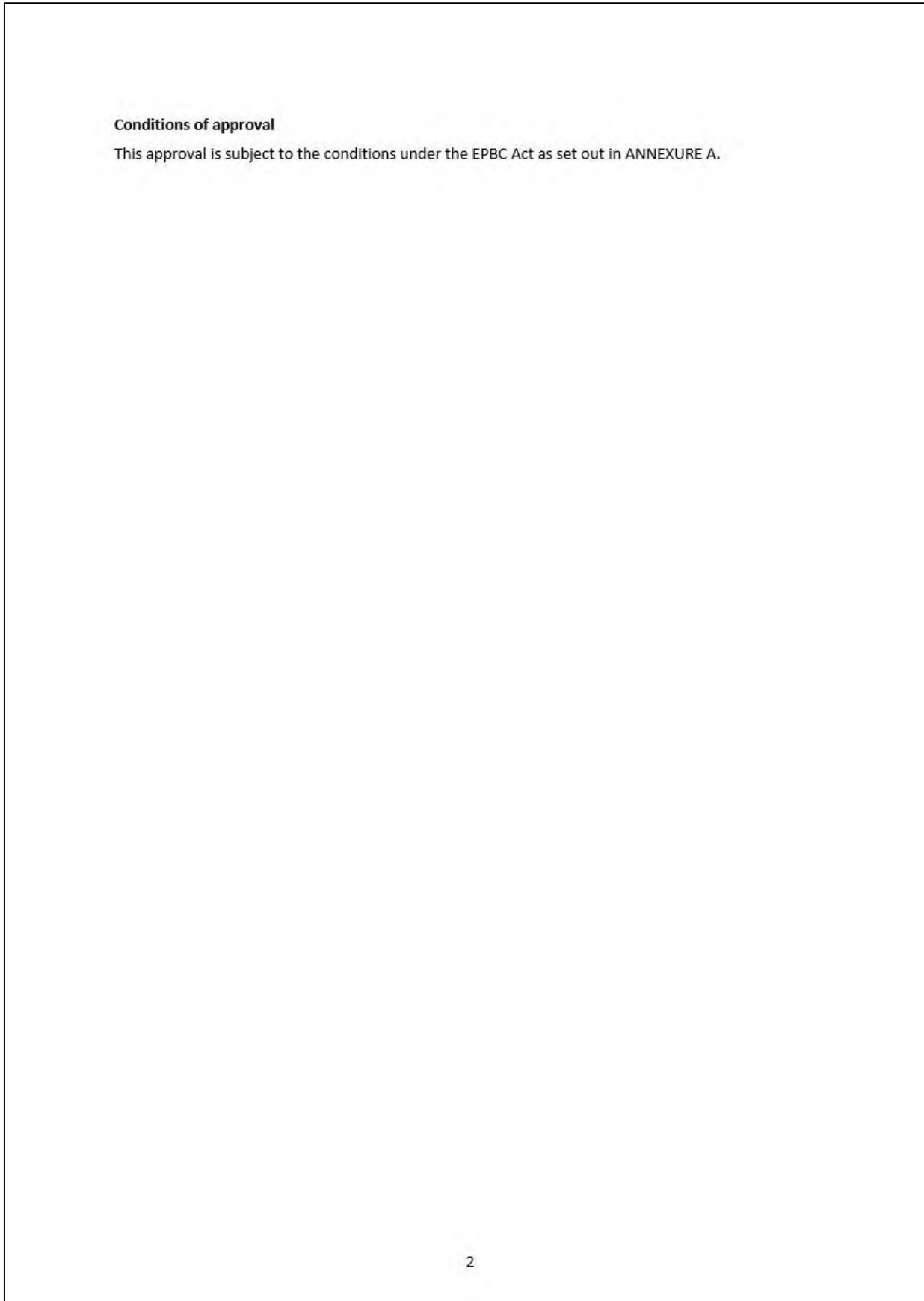


Figure 3. EPBC Act Approval (page 2 of 17).

ANNEXURE A – CONDITIONS OF APPROVAL

Part A – Conditions specific to the action

Construction/clearance limits

1. To minimise **impacts** to **protected matters**, the approval holder must not:
 - a. **construct** more than 38 wind turbine generators within the **project area**;
 - b. **clear** outside the **project area**;
 - c. **clear** more than 8.04 ha of **Pygmy Blue-tongue Lizard habitat** within the **project area**;
 - d. **clear** more than 18 individual plants of **Trailing Hop-bush** within the **project area**; and
 - e. **clear** more than 12.67 ha of the **Iron-grass Natural Temperate Grassland of South Australia TEC** within the **project area**.

Environmental management plans

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**.
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.
4. 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.

Bird Adaptive Management Plan

5. The approval holder must submit to the **Department** for the **Minister's** approval a Bird Adaptive Management Plan (BAMP) within 12 months of the date of this approval. The environmental objectives of the BAMP are to effectively monitor for any **impacts** to **listed bird species** during the **operation** of the wind farm from (but not limited to) wind turbine strikes and, if any **impacts** are detected, to implement the technology, measures and procedures necessary to ensure that the **impacts** are accurately measured, reported and remain insignificant.

The BAMP must:

- a. be consistent with the **Environmental Management Plan Guidelines**;
- b. specify relevant **protected matters**, and reference to the **EPBC Act** approval conditions to which the BAMP refers;
- c. include a table of commitments to achieve the BAMP's environmental objectives and a reference to where the commitments are detailed in the BAMP;
- d. include an assessment of risks to achieving the BAMP's environmental objectives and risk management strategies that will be applied;
- e. include a **post-commissioning** long-term wind turbine generator collision monitoring program to detect and manage potential **impacts** to **listed bird species** as a result of collision, which must:
 - i. contain details of the nature, timing and frequency of monitoring to inform progress against achieving the environmental outcomes and be sufficient to determine whether the BAMP is likely to achieve those environmental outcomes in adequate time to implement all necessary corrective actions;

Figure 4. EPBC Act Approval (page 3 of 17).

- ii. include the findings of exhaustive pre-commissioning scavenger activity and searcher efficiency trials;
 - iii. demonstrate how site-specific and species-specific risks and uncertainties (for example, findings of the pre-commissioning scavenger activity and searcher efficiency trials) have informed the design of the monitoring program; and
 - iv. contain commitments to DNA test carcasses that cannot be otherwise identified by a **suitably qualified bird expert**, to undertake further periodic carcass persistence and searcher efficiency trials to check if assumptions need revision, to maximise turbine collision detection in a timely manner, and to maximise carcass detection in a timely manner.
- f. include reporting commitments and timeframes for the provision of site-specific and species-specific information, which must:
- i. contain annual turbine strike reports comprising raw data and strike notifications, survey methodologies, results of detection/persistence trials, environmental/meteorological conditions, and associated statistical analysis; and
 - ii. contain estimation of annual mortality rate for each **listed bird species** comprising supporting evidence from case studies of **listed bird species** carcass size classes, results of persistence trials and searcher efficiency trials, annual probability of detection and monthly strike monitoring, and collision monitoring protocol and survey effort; and
 - iii. contain species occurrence records prepared in accordance with **Guidelines for Biological Survey and Mapped Data**.
- g. include an adaptative management framework designed to:
- i. ensure that no **significant impacts to listed bird species** are likely to occur as a result of the action;
 - ii. clearly demonstrate the linkages between environmental outcomes, implementation and management measures, monitoring, reporting and investigations, and implementation of corrective actions to ensure the environmental outcomes will be achieved;
 - iii. incorporate site-specific data collected through ongoing monitoring activities, and to take into account changes to turbine risk ratings;
 - iv. propose corrective actions if triggers are reached, such as bird and insect deterrents, low wind speed curtailments, wind turbine generator temporary or permanent shutdown, and/or permanent decommissioning of specific wind turbine generators; and
- h. commit that, if **significant impacts to listed bird species** occur, or are likely to have occurred, as a result of the action, the approval holder will, within 3 months of becoming aware of any actual or likely **significant impact**, submit to the **Department** for the approval of the **Minister** a revised BAMP responding to, and accompanied by, an evaluation prepared by a **suitably qualified bird expert** of the effectiveness of the BAMP in preventing **significant impacts to listed bird species**.

The approval holder must not **commission** unless the BAMP has been approved by the **Minister** in writing. The approval holder must commence implementing the approved BAMP before **commissioning** and continue implementing the approved BAMP until the **completion of the action**.

Environmental offsets

Offset Management Plan

6. To compensate for residual **significant impacts** to the **Pygmy Blue-tongue lizard** and the **Iron-grass Natural Temperate Grassland of South Australia TEC**, the approval holder must submit to

Figure 5. EPBC Act Approval (page 4 of 17).

the **Department** for the **Minister's** approval an Offset Management Plan (OMP) within 6 months of the date of this approval.

The OMP must:

- a. be consistent with the **Environmental Management Plan Guidelines**;
- b. include a reference to the **EPBC Act** approval conditions to which the OMP refers;
- c. include summary information on the residual **significant impacts** to the **Pygmy Blue-tongue Lizard** and the **Iron-grass Natural Temperate Grassland of South Australia TEC** that will be compensated for by the offset(s);
- d. identify a suitable environmental offset(s) to compensate for residual **significant impacts** to the **Pygmy Blue-tongue lizard** and the **Iron-grass Natural Temperate Grassland of South Australia TEC** that meets the requirements of the **Environmental Offsets Policy** to the satisfaction of the **Minister**;
- e. include detailed baseline habitat quality information on the proposed offset(s);
- f. commit to achievable ecological benefits and provide timeframes for their achievement;
- g. detail how the offset(s) will be protected, and ecological benefits maintained;
- h. describe the monitoring program(s) to be implemented that will determine progress towards attainment of and maintenance of the ecological benefits at the proposed offset(s), which must include:
 - i. measurable performance indicators to monitor attainment of the ecological benefits;
 - ii. trigger values for corrective actions; and
 - iii. the timing and frequency of monitoring to detect trigger values and changes in the performance indicators.
- i. include an assessment of risks to achieving the ecological benefit(s) and what risk management strategies will be applied to address these;
- j. specify how and at what frequency offset(s) management results, monitoring program findings and assessments of ecological benefits will be reported to the **Department** and the public;
- k. propose corrective actions to ensure ecological benefits are attained or maintained, if trigger values are reached or performance indicators not attained;
- l. include links to referenced **plans** and applicable conditions of approval (including State approval conditions), if any; and
- m. specify and justify the period for which the OMP will be implemented.

The approval holder must not commence **commissioning** until the OMP has been approved by the **Minister** in writing. The approval holder must implement the approved OMP for the period specified in the approved OMP.

7. 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**.
8. 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 12 months of the OMP approval date. The written evidence must identify the **legal securing mechanism** by which each offset site will be permanently protected for conservation.

Note: The approval holder may choose to submit separate Offset Management Plans (OMPs) for the **Pygmy Blue-tongue Lizard** and the **Iron-grass Natural Temperate Grassland of South Australia TEC** instead of a single OMP.

Figure 6. EPBC Act Approval (page 5 of 17).

Note: The approval holder may choose to combine the OMPs required as conditions of approval for other proposed elements of the **Goyder South Hybrid Renewable Energy Facility** for the same **protected matters**. In this case, the approval holder must clearly demonstrate how the offset requirement(s) for each individual proposed element is being met and identify unique offset area(s) for each approved action geospatially.

Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan

9. 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 to the **Department** for the **Minister's** approval a Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan (PBTL Research Plan) within 12 months of the date of this approval.

The PBTL Research Plan must:

- a. be prepared by a **suitably qualified researcher**;
- b. be designed, primarily, to generate and analyse a decade of data to improve the understanding of the long-term **impacts** of wind turbine noise, vibration and shadow flickering on **Pygmy Blue-tongue Lizard**;
- c. clearly specify research objectives and methodologies;
- d. specify timelines and/or milestones for delivery of findings, reports and scientific paper publication;
- e. incorporate contemporary experimental design and methodologies including, but not limited to, those applied by the **PBTL Recovery Team**; and
- f. contain detailed costings and a commitment by the approval holder to fully fund at least 87 percent of the total cost of implementation of the PBTL Research Plan for at least 11 years.

The approval holder must not **commission** unless the PBTL Research Plan has been approved by the **Minister** in writing.

10. In relation to the PBTL Research Plan required under condition 9, the approval holder must provide to the **Department**:
- a. signed contracts exchanged between a **suitably qualified researcher** and the approval holder committing both parties to implement the PBTL Research Plan within 24 months of the date of this approval;
 - b. reports describing the work undertaken as part of the PBTL Research Plan in each **compliance report** until the final assessment report of the findings of the PBTL Research Plan has been published;
 - c. a detailed preliminary assessment report of the findings of the PBTL Research Plan within 90 months of the date of this approval; and
 - d. a final assessment report of the findings of the PBTL Research Plan within 13 years of the date of this approval,
and submit the findings of the PBTL Research Plan for publication in a relevant, reputable, peer-reviewed scientific journal.

Part B – Standard administrative conditions

Notification of date of commencement of the action

11. The approval holder must notify the **Department** in writing of the date of **commencement of the action** and the date of **commissioning** within 10 **business days** after the date of **commencement of the action** and after the date of **commissioning**.
12. If the **commencement of the action** does not occur within 5 years from the date of this approval, then the approval holder must not **commence the action** without the prior written agreement of the **Minister**.

Figure 7. EPBC Act Approval (page 6 of 17).

Compliance records

13. The approval holder must maintain accurate and complete **compliance records**.
14. If the **Department** makes a request in writing, the approval holder must provide electronic copies of **compliance records** to the **Department** within the timeframe specified in the request.

Note: **Compliance records** may be subject to audit by the **Department** or an independent auditor in accordance with section 458 of the **EPBC Act**, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the **Department's** website or through the general media.

Submission and publication of plans

15. The approval holder must:
- a. submit **plans** electronically to the **Department** for approval by the **Minister**;
 - b. unless otherwise agreed to in writing by the **Minister**, publish each **plan** on the **website** within 20 **business days** of the date:
 - i. of this approval decision if the version of the **plan** to be implemented is specified in these conditions;
 - ii. the **plan** is approved by the **Minister** if these conditions require that the **plan** be approved by the **Minister**; or
 - iii. the **plan** is approved by a responsible State minister of State authority if the **plan** is required as part of the **SA development approval**;
 - iv. a revised action management plan is submitted to the **Minister** or the **Department** if the **plan** is submitted in accordance with condition 23;
 - c. exclude or redact **sensitive ecological data** from **plans** published on the **website** or provided to a member of the public; and
 - d. keep **plans** published on the **website** until the end date of this approval.
16. The approval holder must ensure that any **monitoring data** (including **sensitive ecological data**), surveys, maps, and other spatial and metadata required under a **plan** is prepared in accordance with the *Guidelines for biological survey and mapped data*, Commonwealth of Australia (2018), and submitted electronically to the **Department** in accordance with the requirements of the **plan**.

Annual compliance reporting

17. The approval holder must prepare a **compliance report** for each 12 month period following the date of **commencement of the action**, or otherwise in accordance with an annual date that has been agreed to in writing by the **Minister**. The approval holder must:
- a. publish each **compliance report** on the **website** within 60 **business days** following the relevant 12 month period;
 - b. notify the **Department** by email that a **compliance report** has been published on the **website** and provide the weblink for the **compliance report** within 5 **business days** of the date of publication;
 - c. keep all **compliance reports** publicly available on the **website** until this approval expires;
 - d. exclude or redact **sensitive ecological data** from **compliance reports** published on the **website**; and
 - e. where any **sensitive ecological data** has been excluded from the version published, submit the full **compliance report** to the **Department** within 5 **business days** of publication.

Note: **Compliance reports** may be published on the **Department's** website.

Figure 8. EPBC Act Approval (page 7 of 17).

Reporting non-compliance

18. The approval holder must notify the **Department** in writing of any: **incident**; non-compliance with the conditions; or non-compliance with the commitments made in **plans**. The notification must be given as soon as practicable, and no later than **2 business days** after becoming aware of the **incident** or non-compliance. The notification must specify:
 - a. any condition which is or may be in breach;
 - b. a short description of the **incident** and/or non-compliance; and
 - c. the location (including co-ordinates), date, and time of the **incident** and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.
19. The approval holder must provide to the **Department** the details of any **incident** or non-compliance with the conditions or commitments made in **plans** as soon as practicable and no later than **10 business days** after becoming aware of the **incident** or non-compliance, specifying:
 - a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;
 - b. the potential **impacts** of the **incident** or non-compliance; and
 - c. the method and timing of any remedial action that will be undertaken by the approval holder.

Independent audit

20. The approval holder must ensure that **independent audits** of compliance with the conditions are conducted as requested in writing by the **Minister**.
21. For each **independent audit**, the approval holder must:
 - a. provide the name and qualifications of the independent auditor and the draft audit criteria to the **Department**;
 - b. only commence the **independent audit** once the audit criteria have been approved in writing by the **Department**; and
 - c. submit an audit report to the **Department** within the timeframe specified in the approved audit criteria.
22. The approval holder must publish the audit report on the **website** within **10 business days** of receiving the **Department's** approval of the audit report and keep the audit report published on the **website** until the end date of this approval.

Revision of action management plans

23. The approval holder may, at any time, apply to the **Minister** for a variation to an action management plan approved by the **Minister** or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the **EPBC Act**. If the **Minister** approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.
24. The approval holder may choose to revise an action management plan approved by the **Minister** under conditions 3 and 4, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the **EPBC Act**, if the taking of the action in accordance with the RAMP would not be likely to have a **new or increased impact**.
25. If the approval holder makes the choice under condition 24 to revise an action management plan without submitting it for approval, the approval holder must:
 - a. notify the **Department** in writing that the approved action management plan has been revised and provide the **Department** with:

Figure 9. EPBC Act Approval (page 8 of 17).

- i. an electronic copy of the RAMP;
 - ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;
 - iii. an explanation of the differences between the approved action management plan and the RAMP;
 - iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a **new or increased impact**; and
 - v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 **business days** after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the **Department**.
- b. subject to condition 27, implement the RAMP from the RAMP implementation date.
26. The approval holder may revoke their choice to implement a RAMP under condition 24 at any time by giving written notice to the **Department**. If the approval holder revokes the choice under condition 24, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 24.
27. If the **Minister** gives a notice to the approval holder that the **Minister** is satisfied that the taking of the action in accordance with the RAMP would be likely to have a **new or increased impact**, then:
- a. condition 24 does not apply, or ceases to apply, in relation to the RAMP; and
 - b. the approval holder must implement the action management plan specified by the **Minister** in the notice.
28. At the time of giving the notice under condition 27, the **Minister** may also notify that for a specified period of time, condition 24 does not apply for one or more specified action management plans.

Note: conditions 24, 25, 26 and 27 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the **Minister** for approval.

Completion of the action

29. Within 30 days after the **completion of the action**, the approval holder must notify the **Department** in writing and provide **completion data**.

Part C – Definitions

In these conditions, except where contrary intention is expressed, the following definitions are used:

Business day means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the action.

Clear/Clearing means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of vegetation.

Commencement of the action/Commence the action means the first instance of any specified activity associated with the action including **clearing** and **construction**. **Commencement of the action/Commence the action** does not include minor physical disturbance necessary to:

- i. undertake pre-clearance surveys or monitoring programs;
- ii. install signage and /or temporary fencing to prevent unapproved use of the project area;
- iii. protect environmental and property assets from fire, weeds and pests, including installation of temporary fencing, and use of existing surface access tracks;

Figure 10. EPBC Act Approval (page 9 of 17).

- iv. install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they have no **impact** on the **protected matters**; or
- v. undertaking geotechnical investigations if it causes only minor physical disturbance and is required well in advance of most site works to inform design.

Commission/Commissioning means all activities, including turning of turbines, after the components of the first complete wind turbine are installed. The date on which **commission/commissioning** commences is the first date on which the blades of the first completed wind turbine start rotating.

Completion data means an environmental report and spatial data clearly detailing how the conditions of this approval have been met. The **Department's** preferred spatial data format is **shapefile**.

Completion of the action means the date on which all specified activities associated with the action have permanently ceased.

Compliance records means all documentation or other material in whatever form required to demonstrate compliance with the conditions of approval in the approval holder's possession or that are within the approval holder's power to obtain lawfully.

Compliance report(s) means written reports:

- i. providing accurate and complete details of compliance, **incidents**, and non-compliance with the conditions and the **plans**;
- ii. consistent with the *Annual Compliance Report Guidelines, Commonwealth of Australia 2014*;
- iii. include a **shapefile** of any clearance of any **protected matters**, or their habitat, undertaken within the relevant 12 month period; and
- iv. annexing a schedule of all **plans** prepared and in existence in relation to the conditions during the relevant 12 month period.

Construct/Construction means the erection of a building or structure that is or is to be fixed to the ground and wholly or partially fabricated on-site; the alteration, maintenance, repair or demolition of any building or structure; preliminary site preparation work which involves breaking of the ground (including pile driving); the laying of pipes and other prefabricated materials in the ground, and any associated excavation work; but excluding the installation of temporary fences and signage.

Department means the Australian Government agency responsible for administering the EPBC Act.

Environmental Offsets Policy means the *Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy, Commonwealth of Australia 2012*, or any subsequent official revision produced by the **Department**.

EPBC Act means the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

Goyder South Hybrid Renewable Energy Facility is a renewable energy development located between Burra and Robertstown in the Mid North of South Australia, and represented by the area shown enclosed by the yellow line labelled 'Goyder south Hybrid Renewable Energy Facility' on the map at [Attachment A](#). The **Goyder South Hybrid Renewable Energy Facility** includes, in addition to the action subject of this approval, the proposed actions described in the EPBC Act referrals 2021/8957, 2021/8959 and 2021/8960.

Impact (verb) means any event which has the potential to, or does, impact on one or more **protected matter**.

Figure 11. EPBC Act Approval (page 10 of 17).

Incident means any event which has the potential to, or does, impact on one or more **protected matter**.

Independent audit means an audit conducted by an independent and **suitably qualified person** as detailed in the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines*, Commonwealth of Australia 2019.

Iron-grass Natural Temperate Grassland of South Australia TEC means the EPBC Act listed threatened ecological community (TEC) *Iron-grass Natural Temperate Grassland of South Australia*.

INTG TEC Management Plan means the *Goyder South Hybrid Renewable Energy Facility INTG TEC Management Plan* prepared by EBS Ecology for NEOEN Australia Pty Ltd (version 3 of 28 June 2022 or subsequent revisions thereof).

Listed bird species means all bird species listed under the EPBC Act as a listed threatened species or as a listed migratory species.

Monitoring data means the data required to be recorded under the conditions of this approval.

Minister means the Australian Government Minister administering the EPBC Act including any delegate thereof.

New or increased impact means a new or increased environmental impact or risk relating to any **protected matter**, when compared to the likely impact of implementing the action management plan that has been approved by the **Minister** under conditions 3 and 4, including any subsequent revisions approved by the **Minister**, as outlined in the *Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals*, Commonwealth of Australia 2017.

Operation means all activities that occur after the components of the final wind turbine generator are installed.

Plan(s) means any of the documents required to be prepared, approved by the **Minister**, implemented by the approval holder and published on the **website** in accordance with these conditions (includes action management plans and/or strategies).

Project area means the location of the action, represented by the area shown enclosed by the dashed magenta line labelled 'Wind Farm 1A' on the maps at [Attachments A, B, C and D](#).

Protected matter(s) means a matter protected under a controlling provision in Part 3 of the EPBC Act for which this approval has effect.

Pygmy Blue-tongue Lizard is the EPBC Act listed threatened species *Tiliqua adelaidensis*.

Pygmy Blue-tongue Lizard habitat means remnant native grassland or grassy woodland with a sparse overstorey of trees, represented in the map at [Attachment C](#) by the areas shown enclosed by the green line labelled as 'Pygmy Blue-tongue Lizard habitat'.

PBTL Management Plan means the *Goyder South Hybrid Renewable Energy Facility PBTL Management Plan* prepared by EBS Ecology for NEOEN Australia Pty Ltd (version 3 of 28 June 2022 or subsequent versions thereof).

PBTL Recovery Team means a collaboration of partners brought together by common objectives to develop and/or coordinate the implementation of a recovery plan, conservation advice or program for the **Pygmy Blue-tongue Lizard**.

SA development approval means the approved development application number 422/V009/20 R1 (or subsequent approved revisions thereof) granted under section 131 (19) of the *Planning, Development and Infrastructure Act 2016 (SA)* for the **Goyder South Hybrid Renewable Energy Facility**.

Figure 12. EPBC Act Approval (page 11 of 17).

Sensitive ecological data means data as defined in the *Sensitive Ecological Data – Access and Management Policy V1.0*, Commonwealth of Australia 2013.

Shapefile means location and attribute information of the action provided in an Esri shapefile format. Shapefiles must contain '.shp', '.shx', '.dbf' files and a '.prj' file that specifies the projection/geographic coordinate system used. Shapefiles must also include an '.xml' metadata file that describes the shapefile for discovery and identification purposes.

Significant impacts are **impacts** which are important, notable, or of consequence, having regard to their context or intensity, and assessed within the framework of the *Matters of National Environmental Significance – Significant Impact Guidelines 1.1*, Commonwealth of Australia 2013.

Suitably qualified bird expert means a person who has relevant professional qualifications and at least 3 years of work experience designing and implementing plans for the conservation management of birds, who can identify bird species, and who can give an authoritative assessment and advice practices to avoid and mitigate impacts on birds using relevant protocols, standards, methods and/or literature. If the person does not have appropriate professional qualifications, the person must have at least 10 years of work experience identifying bird species, and designing and implementing plans for the conservation management of birds.

Suitably qualified researcher means a person who has academic qualifications in ecology (or related subject areas) and training, skills and experience related to the nominated subject matter using the relevant protocols, standards, methods and/or literature, or a person who is studying to obtain academic qualifications related to the nominated subject matter (e.g., a university post-graduate student), provided they work under the supervision of a person who holds relevant academic qualifications and training, skills and substantial experience on the nominated subject matter.

Suitably qualified person means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.

Trailing Hop-bush is the EPBC Act listed threatened species *Dodonaea procumbens*.

Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

Figure 13. EPBC Act Approval (page 12 of 17).

ATTACHMENTS

1. **Attachment A** – Location of Wind Farm 1A within the Goyder South Renewables Energy Facility.
2. **Attachment B** – Project area and Infrastructure footprint.
3. **Attachment C** – Pygmy Blue-tongue Lizard habitat.
4. **Attachment D** – Iron-grass Natural Temperate Grassland of South Australia TEC habitat.

Figure 14. EPBC Act Approval (page 13 of 17).

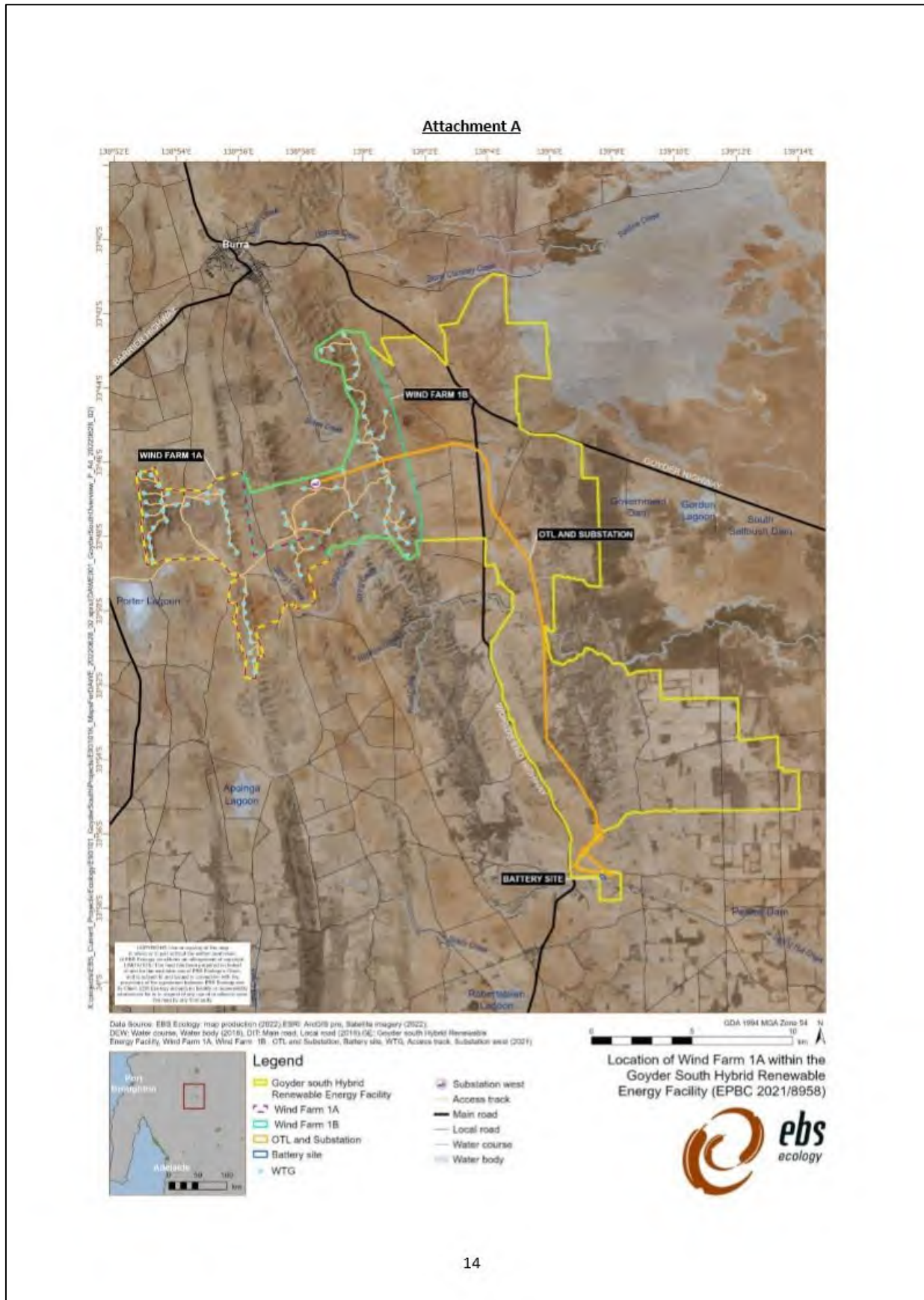


Figure 15. EPBC Act Approval (page 14 of 17).



Figure 16. EPBC Act Approval (page 15 of 17).



Figure 17. EPBC Act Approval (page 16 of 17).

Appendix 2. Maps of Stage 1A

Refer to the following page.



Figure 19. Stage 1A with WTGs and other infrastructure; Trailing Hop-bush plants; PBTL habitat; INTG TEC patches; and impacted areas (refer to the following two figures for more detail).



Figure 20. Zoom-in map 1 of 2 showing Trailing Hop-bush plants; impacted Pygmy Blue-tongue Lizard habitat and Class B INTG TEC patches.



Figure 21. Zoom-in map 2 of 2 showing impacted Pygmy Blue-tongue Lizard habitat and Class B INITG TEC patches.

Appendix 3. Submission of BAMP

From: Inès Béchameil <ines.bechameil@neoen.com>
Sent: Wednesday, 5 July 2023 3:06 PM
To: Dowd, Tony
Cc: Post Approval
Subject: Goyder South Hybrid Renewable Energy Facility - Bird Adaptative Management Plan
Attachments: BAMP_20230705.pdf

Dear Tony,

In respect of the Wind Farm 1A and Wind Farm 1B components of the Goyder south Hybrid Renewable Energy Facility, we as the approval holder, submit to the Department of Climate Change, Energy, the Environment and Water (the **Department**) a combined Bird Adaptative Management Plan (**BAMP**). This submission is made pursuant to:

- Condition 5 of the *Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra SA (EPBC 2021/8958)*, dated 5 July 2022;
- Condition 4 of the *Goyder South Hybrid Renewable Energy Facility – Wind Farm 1B, 5km south Burra SA (EPBC 2021/8957)*, dated 13 July 2022; and

As the EPBC approval conditions state that the approval holder must not *commission* (refer to the definition in relevant approval conditions) until the BAMP has been approved by the Minister in writing, and the current Project schedule involves the commencement of commissioning of the first turbine for Wind Farm 1A in September 2023 and commencement of commissioning of the first turbine for Wind Farm 1B in April 2024, please note that Neoen is aiming for **approval of the BAMP by the end of August 2023**.

Could you please confirm receipt of this email and of the BAMP?

And could you please let us know whether you are available for a meeting within the next 2 weeks so we can present this BAMP and start discussing any comments or questions that DCCEEW would have before approval can be provided?

Thank you in advance.

Kind Regards,

Inès Béchameil
Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000
M. +61 432 273 429

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Figure 22. Submission of BAMP to the Department via email.

Appendix 4. Submission of PBTL OMP and INTG TEC OMP

From: Inès Béchameil <ines.bechameil@neoen.com>
Sent: Thursday, 5 January 2023 5:09 PM
To: Aldred, Jeremy; Nielsen, Robin
Cc: Post Approval
Subject: Goyder South Hybrid Renewable Energy Facility - PBTL Offset Management Plan
Attachments: PBTL OMP_20230105.pdf

Dear Jeremy and Robin,

In respect of the Wind Farm 1A, Wind Farm 1B, and OTL and Substation components of the Goyder south Hybrid Renewable Energy Facility, we as the approval holder, submit to the Department of Climate Change, Energy, the Environment and Water (the **Department**) a combined Pygmy Blue-tongue lizard Offset Management Plan (**PBTL OMP**). This submission is made pursuant to:

- Condition 6 of the *Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra SA (EPBC 2021/8958)*, dated 5 July 2022;
- Condition 5 of the *Goyder South Hybrid Renewable Energy Facility – Wind Farm 1B, 5km south Burra SA (EPBC 2021/8957)*, dated 13 July 2022; and
- Condition 4 of the *Goyder South Hybrid Renewable Energy Facility – OTL and Substation, Worlds End, SA (EPBC 2021/8959)*, dated 28 July 2022 as well as corresponding variation dated 19 December 2022.

Please note that as the final design for Wind Farm 1A and Wind Farm 1B components of the Goyder South Hybrid Renewable Energy Facility is planned to be finalised in January 2023, we have not yet confirmed in this PBTL OMP the expected impact and offset required due to unexpected PBTL discoveries raised with DCCEEW between August and October 2022. Accordingly, we are planning to submit a revised PBTL MP to DCCEEW in February 2023, incorporating the impact of those findings.

As the EPBC approval conditions state that the approval holder must not commence *operation or commissioning* (refer to definitions in relevant approval conditions) until the INTG TEC OMP has been approved by the Minister, and the Project schedule involves the operation of the OTL and Substation in July 2023 and commencement of commissioning of the first turbine for Wind Farm 1A in August 2023 and commencement of commissioning of the first turbine for Wind Farm 1B in January 2024, please note that Neoen is aiming for **approval of the PBTL OMP by the end of May 2023**.

Could you please confirm receipt of this email and of the PBTL OMP?

And could you please let us know whether the Department is available for a meeting by end January 2023 so we can present this PBTL MP and start discussing any comments or questions that DCCEEW would have before approval can be provided?

Kind Regards,

Inès Béchameil
Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000
M. +61 432 273 429

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Figure 23. Submission of PBTL OMP via email.

From: Inès Béchameil <ines.bechameil@neoen.com>
Sent: Thursday, 5 January 2023 4:30 PM
To: Aldred, Jeremy; Nielsen, Robin
Cc: Post Approval
Subject: Goyder South Hybrid Renewable Energy Facility - INTG TEC Offset Management Plan
Attachments: INTG TEC OMP_20230105.pdf

Dear Jeremy and Robin,

In respect of the Wind Farm 1A and OTL and Substation components of the Goyder south Hybrid Renewable Energy Facility, we as the approval holder, submit to the Department of Climate Change, Energy, the Environment and Water (the **Department**) a combined Iron-grass Natural Temperate Grassland of South Australia Offset Management Plan (**INTG TEC OMP**). This submission is made pursuant to:

- Condition 6 of the *Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra SA (EPBC 2021/8958)*, dated 5 July 2022; and
- Condition 4 of the *Goyder South Hybrid Renewable Energy Facility – OTL and Substation, Worlds End, SA (EPBC 2021/8959)*, dated 28 July 2022 as well as corresponding variation dated 19 December 2022.

As the EPBC approval conditions state that the approval holder must not commence *operation or commissioning* (refer to definitions in relevant approval conditions) until the INTG TEC OMP has been approved by the Minister, and the Project schedule involves the operation of the OTL and Substation in July 2023 and commencement of commissioning of the first turbine for Wind Farm 1A in August 2023, please note that Neoen is aiming for **approval of the INTG TEC OMP by the end of May 2023**.

Could you please confirm receipt of this email and of the INTG TEC OMP?

And could you please let us know whether the Department is available for a meeting by end January 2023 so we can present this INTG TEC OMP and start discussing any comments or questions that DCCEEW would have before approval can be provided?

Kind Regards,

Inès Béchameil
Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000
M. +61 432 273 429

Figure 24. Submission of INTG TEC OMP via email.

Appendix 5. Request for extension of time for submission of PBTL Research Plan

From: Inès Béchameil <ines.bechameil@neoen.com>
Sent: Wednesday, 5 July 2023 5:08 PM
To: Dowd, Tony
Cc: Post Approval; EPBC Monitoring
Subject: Goyder South Hybrid Renewable Energy Facility - Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan
Attachments: 2023-07-05 GSWF-DCCEEW-Request-to-Vary-Conditions-of-Approval.pdf

Dear Tony,

In respect of the Wind Farm 1A component of the Goyder south Hybrid Renewable Energy Facility, we as the approval holder, request for the Department of Climate Change, Energy, the Environment and Water (the **Department**) to vary Condition 9 of the *Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra SA (EPBC 2021/8958)*, dated 5 July 2022.

Condition 9 requires the Pygmy Blue-tongue Lizard Scientific Monitoring and Research Plan (PBTL Research plan) to be submitted on the 05 July 2023. As discussed previously, we kindly request for the Department to consider an extension of time for the submission of this plan. Details and explanations are provided in the letter attached.

Kind Regards,

Inès Béchameil
Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000
M. +61 432 273 429

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Figure 25. Email with letter requesting extension of time for submission of PBTL Research Plan.



Goyder Wind Farm 1 Pty Ltd
as trustee for the Goyder Wind Farm 1 Trust
Level 21, 570 George Street
Sydney NSW 2000

Department of Climate Change, Energy, the Environment and Water
Post Approvals Section

Attention: Tony Dowd
By email: Tony.Dowd@dcceew.gov.au
Cc: PostApproval@dcceew.gov.au and EPBCMonitoring@awe.gov.au

05 July 2023

Request to Vary Conditions of Approval – EPBC 2021/8958

Dear Tony,

Neoen is requesting a variation to the approval conditions associated with the Goyder South Hybrid Renewable Energy Facility Wind Farm 1A (EPBC 2021/8958).

The requested variations are detailed below and are considered necessary or convenient for the protected matter, which in this case is the Pygmy Blue-tongue lizard (PBTL). Some explanation is provided under each proposed variation.

Requested variations are:

- Condition 9 - change "within 12 months" to "17 January 2024"

EPBC 2021/8958 (the Approval) requires for Goyder Wind Farm 1 Pty Ltd (the Approval Holder) to submit to the Department for the Minister's approval a Pygmy Blue-tongue Lizard Scientific Monitoring and Research plan (PBTL Research Plan) by the 5th July 2023 as part of Condition 9 of the Approval. The Approval Holder hereby requests an extension of time of 6 months (including holiday shutdown period) to submit this PBTL Research Plan.

Our consultant EBS Ecology has engaged with Flinders University (Prof Mike Gardner) and their School of Biological Sciences lab (the research lab that has undertaken nearly all research on PBTL to date) since late 2022 to develop the required PBTL Research Plan. A meeting was held with the PBTL Recovery Team on the 29th of May 2023 and it appeared that further refinement of the development and delivery mechanisms of the research program is required. The main challenge being the extended duration of the research program which is unusual (11 years) and hence ensuring consistency in data collection / coordination of the research program during this period.

The additional time requested for the development of the PBTL Research Plan will allow to finalise a realistic research program to be implemented by Flinders University within time and budget constraints. It is considered that this request for an extension of time is necessary and convenient for the PBTL as it will result in better research outcomes for the PBTL in the long term. Furthermore, the primary objective of the research being to improve the understanding of the long-term impacts of wind farms on PBTL, we believe that an extension of 6 months to finalise the plan will not negatively impact the research but will actually benefit the PBTL as it will ensure that the research proposed is academically sound.

Goyder Wind Farm 1 Pty Ltd as trustee for the Goyder Wind Farm 1 Trust – Level 21 – 570 George Street – NSW 2000 SYDNEY

Figure 26. Letter to the Department requesting an extension of time for submission of the PBTL Research Plan (page 1 of 2).

GOYDER RENEWABLES ZONE

- Condition 9. - change "The approval holder must not **commission** unless the PBTL Research Plan has been approved by the **Minister** in writing" with "The approval holder must implement the PBTL Research Plan for at least 11 years and the PBTL Research Plan must be approved by the **Minister** in writing before start of **operation**."

The Approval details that the Approval Holder must not commission unless the PBTL Research Plan has been approved by the Minister in writing.

Considering the request for an extension of time for the submission of the PBTL Research Plan, the Approval Holder requests another extension of time to allow enough time for the Department and the Minister to review and approve the proposed plan.

The change to the wording also strengthens the commitment of the Approval Holder to actively deliver the PBTL Research Plan over the long-term.

Yours sincerely

Inès Béchameil

Construction Project Manager

Goyder Wind Farm 1 Pty Ltd as trustee for Goyder Wind Farm 1 Trust

Goyder Wind Farm 1 Pty Ltd as trustee for the Goyder Wind Farm 1 Trust – Level 21 – 570 George Street – NSW 2000 SYDNEY

Figure 27. Letter to the Department requesting an extension of time for submission of the PBTL Research Plan (page 1 of 2).

Appendix 6. Notification of commencement of the action

From: EPBC Monitoring <EPBCMonitoring@awe.gov.au>
Sent: Friday, 16 September 2022 2:37 PM
To: Inès Béchameil <ines.bechameil@neoen.com>
Cc: John Tregear <john.tregear@neoen.com>; Laszlo Csanyi <laszlo.csanyi@neoen.com>;
EPBCMonitoring@awe.gov.au
Subject: RE: Goyder South Hybrid Renewable Energy Facility - Wind Farm 1A (EPBC 2021/8958) - Date of commencement of the action [SEC=OFFICIAL]

EXTERNAL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Inès,

Please see attached a letter in relation to EPBC 2021/8958.

If you have any questions or concerns please do not hesitate to contact the EPBC Monitoring Mailbox.

Kind regards,

Olivia Moore
Compliance Officer
Environmental Audit Section | Environment Compliance Branch | Chief Counsel Division
Department of Climate Change, Energy, the Environment and Water
Ngunnawal Country, 7 London Circuit
(GPO Box 3090) ACT 2600 Australia
E olivia.moore@environment.gov.au

DCCEEW.gov.au ABN 63 573 932 849

Acknowledgement of Country
Our department recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge First Nations Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging

From: Inès Béchameil <ines.bechameil@neoen.com>
Sent: Wednesday, 6 July 2022 4:02 PM
To: EPBCMonitoring@awe.gov.au
Cc: John Tregear <john.tregear@neoen.com>; Laszlo Csanyi <laszlo.csanyi@neoen.com>
Subject: Goyder South Hybrid Renewable Energy Facility - Wind Farm 1A (EPBC 2021/8958) - Date of commencement of the action

Hi EPBC Monitoring,

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Figure 28. Notification of commencement of the action (page 1 of 2).

Please take this email as a notification from Goyder Wind Farm 1 Pty Ltd under Condition 11 of the Approval Decision attached, that the date of commencement of the action will be the 7th July 2022.

Please note that moving forward, our contact details will be as detailed in the table below. Please ensure to send all correspondences to those 3 email addresses, when required.

Contacts	Name	Title	Phone number	Email address
Primary Contact	Generic Email address	N/A	N/A	contact@goyderenergy.com.au
Primary Contact	Ines Bechameil	Construction Project Manager	+61 432 273 429	ines.bechameil@neoen.com
Back-Up Contact	John Tregear	Construction Project Director	+61 487 688 660	john.tregear@neoen.com

Kind Regards,

Inès Béchameil
Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000
M. +61 432 273 429

Figure 29. Notification of commencement of the action (page 2 of 2).



Australian Government
Department of Climate Change, Energy,
the Environment and Water

Ref: EPBC 2021/8958
Email: epbcmonitoring@awe.gov.au

Inès Béchameil
Project Manager - Australia
Neoen
Level 21 570 George Street
SYDNEY NSW 2000

Dear Inès,

Commencement of the Action – Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, 10km south Burra SA, EPBC 2021/8958

I refer to your email on 6 July 2022 on behalf of Goyder Wind Farm 1 Pty Ltd notifying the Department of Climate Change, Energy, the Environment and Water (the department) of commencement of the action for Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A, SA in accordance with condition 11 of the *Environment Protection and Biodiversity Conservation Act 1999* (the Act) EPBC 2021/8958 approval.

I note that the action commenced on 7 July 2022.

Condition 17 – Annual Compliance Reporting

Condition 17 of the approval states that the approval holder must prepare an Annual Compliance Report for each 12 month period following the date of commencement of the action. The approval holder must continue to publish each report and notify the department of publication until the expiry of the approval on **31 December 2057**. The reports must be published within 60 business days of every 12 month anniversary of commencement. Documentary evidence must be provided to the department within 5 business days the report is published.

Please notify the department of publication of the reports by email, including the link to where the report is publicly available to epbcmonitoring@awe.gov.au. Please note the first Annual Compliance Report is due to the department by **5 September 2023**.

When preparing the report please refer to the department's Annual Compliance Report Guidelines available on the department's website at <http://www.environment.gov.au/epbc/publications/annual-compliance-report-guidelines>

Please note that the conditions of approval require the approval holder to maintain accurate records of all activities associated with, or relevant to, the approval conditions so that they can be made available to the department on request. These documents may be subject to audit and be used to verify compliance. Summaries of audits may be published by the department.

GPO Box 3090 Canberra ACT 2601 • Telephone 02 6272 3933 • Facsimile 02 6272 5161 • www.DCCEEW.gov.au

Figure 30. Letter from the Department to the approval holder regarding commencement of the action (page 1 of 2).

More information about the department's Monitoring and Audit program is available on the department's website at <http://www.environment.gov.au/epbc/compliance-and-enforcement/auditing>.

Section 142 of the Act requires an approval holder to comply with conditions attached to an approval. Penalties may apply to approval holders who contravene conditions.

If you would like to discuss this matter further, please contact Olivia Moore at epbcmonitoring@awe.gov.au

Delivering a publicly accessible national environmental offsets database

Throughout 2021 and 2022, the department has made significant progress on improving systems and processes for environmental offsets including the development of the National Environmental Offsets System (NEOS). NEOS will display details of offsets required under EPBC Act approval conditions, bringing together key information about approved offsets including where they are located, and what matters of national environmental significance are protected. NEOS will be a publicly available searchable register enabling our regulated community as well as departmental officers to accurately identify offset location and assist in making informed decisions about offsets. The first stage of NEOS is planned for release in December 2022. If you would like more information about NEOS, please contact the department at epbcmonitoring@awe.gov.au.

Yours sincerely,



Thomas Long
Assistant Director
Environmental Audit Section
16 September 2022

Figure 31. Letter from the Department to the approval holder regarding commencement of the action (page 1 of 2).

Appendix 7. Initial incident notification

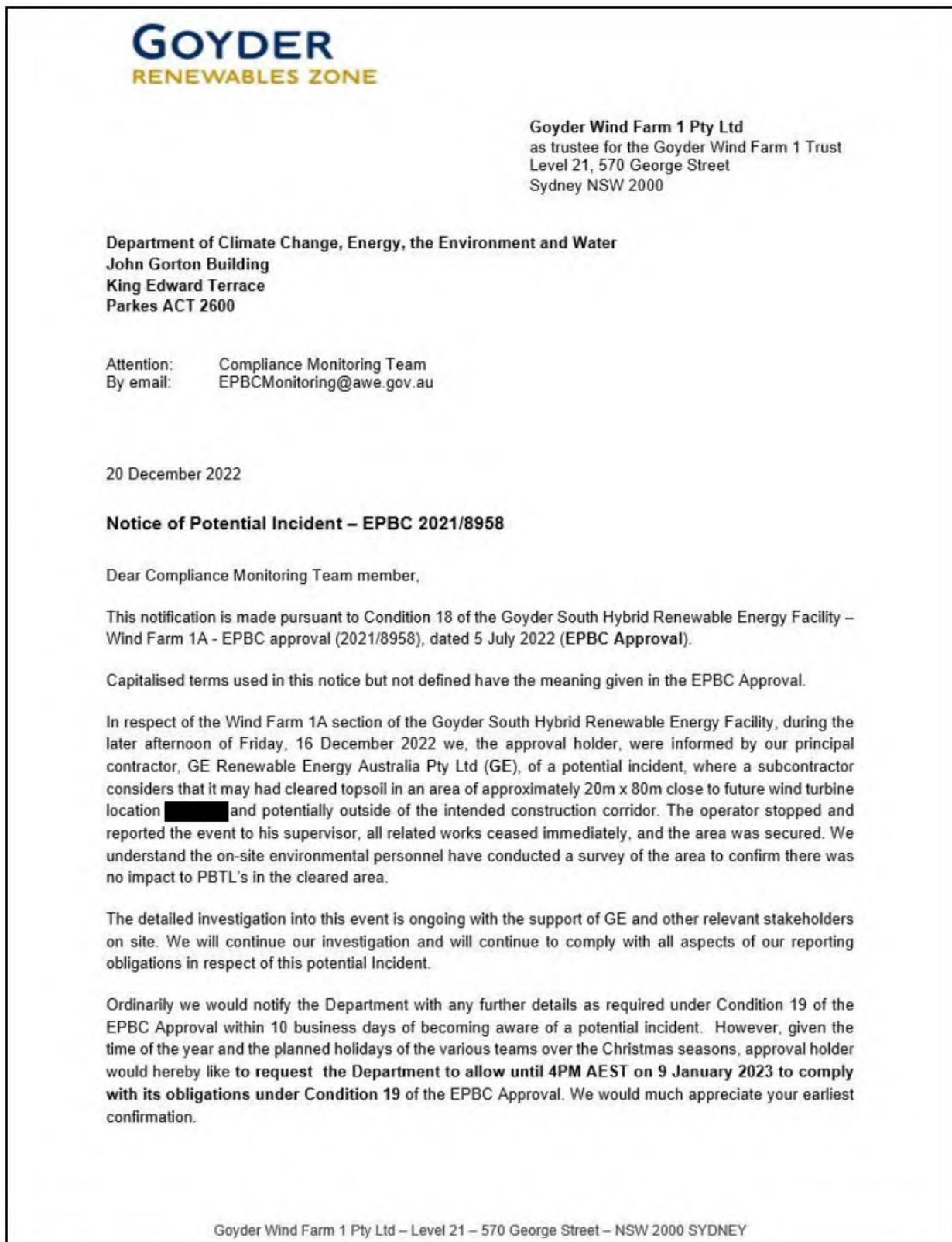


Figure 32. Initial notification (page 1 of 2).

Yours sincerely

Bechameil

Inès Béchameil

Construction Project Manager

Goyder Wind Farm 1 Pty Ltd as trustee for the Goyder Wind Farm 1 Trust

Goyder Wind Farm 1 Pty Ltd – Level 21 – 570 George Street – NSW 2000 SYDNEY

Figure 33. Initial notification (page 2 of 2).

Appendix 8. Correspondence regarding extension for submission of incident report

From: Inès Béchameil
Sent: Friday, 6 January 2023 12:50 PM
To: EPBC Monitoring
Subject: RE: Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A - Notice of Potential incident under Approval 2021/8958 [SEC=UNOFFICIAL]

Thank you Olivia,


Have a nice weekend.

Kind Regards,

Inès Béchameil
Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000
M. +61 432 273 429



From: EPBC Monitoring <epbcmonitoring@dcceew.gov.au>
Sent: Friday, 6 January 2023 12:45 PM
To: Inès Béchameil <ines.bechameil@neoen.com>
Cc: John Tregear <john.tregear@neoen.com>; Laszlo Csanyi <laszlo.csanyi@neoen.com>; EPBC Monitoring <epbcmonitoring@dcceew.gov.au>
Subject: RE: Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A - Notice of Potential incident under Approval 2021/8958 [SEC=UNOFFICIAL]

EXTERNAL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ines,

1

Figure 34. Email correspondence (page 1 of 4).

Thank you for your email.

The department accepts your request to extend the submission of the non-compliance report to **4pm AEST 13 January 2023**.

Kind regards,

Olivia Moore

Compliance Officer

Environmental Audit Section | Environment Compliance Branch | Chief Counsel Division

Department of Climate Change, Energy, the Environment and Water

Ngunnawal Country, John Gorton Building, King Edward Terrace, Parks ACT 2600

(GPO Box 3090) ACT 2601 Australia

E olivia.moore@dcceew.gov.au

DCCEEW.gov.au ABN 63 573 932 849

From: Inès Béchameil <ines.bechameil@neoen.com>

Sent: Friday, 6 January 2023 11:15 AM

To: EPBC Monitoring <epbcmonitoring@dcceew.gov.au>

Cc: John Tregear <john.tregear@neoen.com>; Laszlo Csanyi <laszlo.csanyi@neoen.com>

Subject: RE: Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A - Notice of Potential incident under Approval 2021/8958 [SEC=UNOFFICIAL]

Dear Olivia,

I wish you all the best for the new year, and thank you for accepting our request to extend the submission of the incident report to 9 January 2023.

We have been working this week with our Principal Contractor on the investigation, assessment of impact and corrective actions of the potential incident and they should be able to finalise their incident report early next week.

We would hereby like to request a further extension to 4PM AEST on 13 January 2023 to comply with our obligations under Condition 19. Grateful for your earliest confirmation.

Kind Regards,

Inès Béchameil

Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000

M. +61 432 273 429

Figure 35. Email correspondence (page 2 of 4).



From: EPBC Monitoring <epbcmonitoring@dcceew.gov.au>
Sent: Tuesday, 20 December 2022 4:29 PM
To: Inès Béchameil <ines.bechameil@neoen.com>
Cc: John Tregear <john.tregear@neoen.com>; Laszlo Csanyi <laszlo.csanyi@neoen.com>; EPBC Monitoring <epbcmonitoring@dcceew.gov.au>
Subject: RE: Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A - Notice of Potential incident under Approval 2021/8958 [SEC=UNOFFICIAL]

EXTERNAL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Inès,

Thank you for the incident notification for EPBC 2021/8958.

The department acknowledges receipt of this notification, and it will be reviewed accordingly.

The department accepts your request to extend the submission of the non-compliance report to **9 January 2023**.

For further information please do not hesitate to contact the EPBC Monitoring Mailbox.

Kind regards,

Olivia Moore

Compliance Officer

Environmental Audit Section | Environment Compliance Branch | Chief Counsel Division

Department of Climate Change, Energy, the Environment and Water

Ngunnawal Country, John Gorton Building, King Edward Terrace, Parks ACT 2600

(GPO Box 3090) ACT 2601 Australia

E olivia.moore@dcceew.gov.au

DCCEEW.gov.au ABN 63 573 932 849

From: Inès Béchameil <ines.bechameil@neoen.com>

Sent: Tuesday, 20 December 2022 3:28 PM

Figure 36. Email correspondence (page 3 of 4).

To: EPBC Monitoring <EPBCMonitoring@awe.gov.au>
Cc: John Tregear <john.tregear@neoen.com>; Laszlo Csanyi <laszlo.csanyi@neoen.com>
Subject: Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A - Notice of Potential incident under Approval 2021/8958 [SEC=UNOFFICIAL]

Dear Compliance Monitoring Team member,

Please see attached notice of a potential incident at the Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A.

Details are contained within the notice.

We would hereby like to request an extension to 4PM AEST on 9 January 2023 to comply with the obligations under Condition 19 due to the holiday season and availability of personnel. Grateful for your earliest confirmation.

Please don't hesitate to contact me if you have any questions.

Kind Regards,

Inès Béchameil
Project Manager – Australia

NEOEN

Level 21 / 570 George Street, Sydney NSW 2000
M. +61 432 273 429



----- IMPORTANT - This email and any attachments have been issued by the Australian Government Department of Agriculture, Water and the Environment. The material transmitted is for the use of the intended recipient only and may contain confidential, legally privileged, copyright or personal information. You should not copy, use or disclose it without authorisation from the Department. It is your responsibility to check any attachments for viruses and defects before opening or forwarding them. If you are not an intended recipient, please contact the sender of this email at once by return email and then delete both messages. Unintended recipients must not copy, use, disclose, rely on or publish this email or attachments. The Department of Agriculture, Water and the Environment is not liable for any loss or damage resulting from unauthorised use or dissemination of, or any reliance on, this email or attachments. If you have received this e-mail as part of a valid mailing list and no longer want to receive a message such as this one, advise the sender by return e-mail accordingly. This notice should not be deleted or altered -----

Figure 37. Email correspondence (page 4 of 4).

Appendix 9. Incident Report

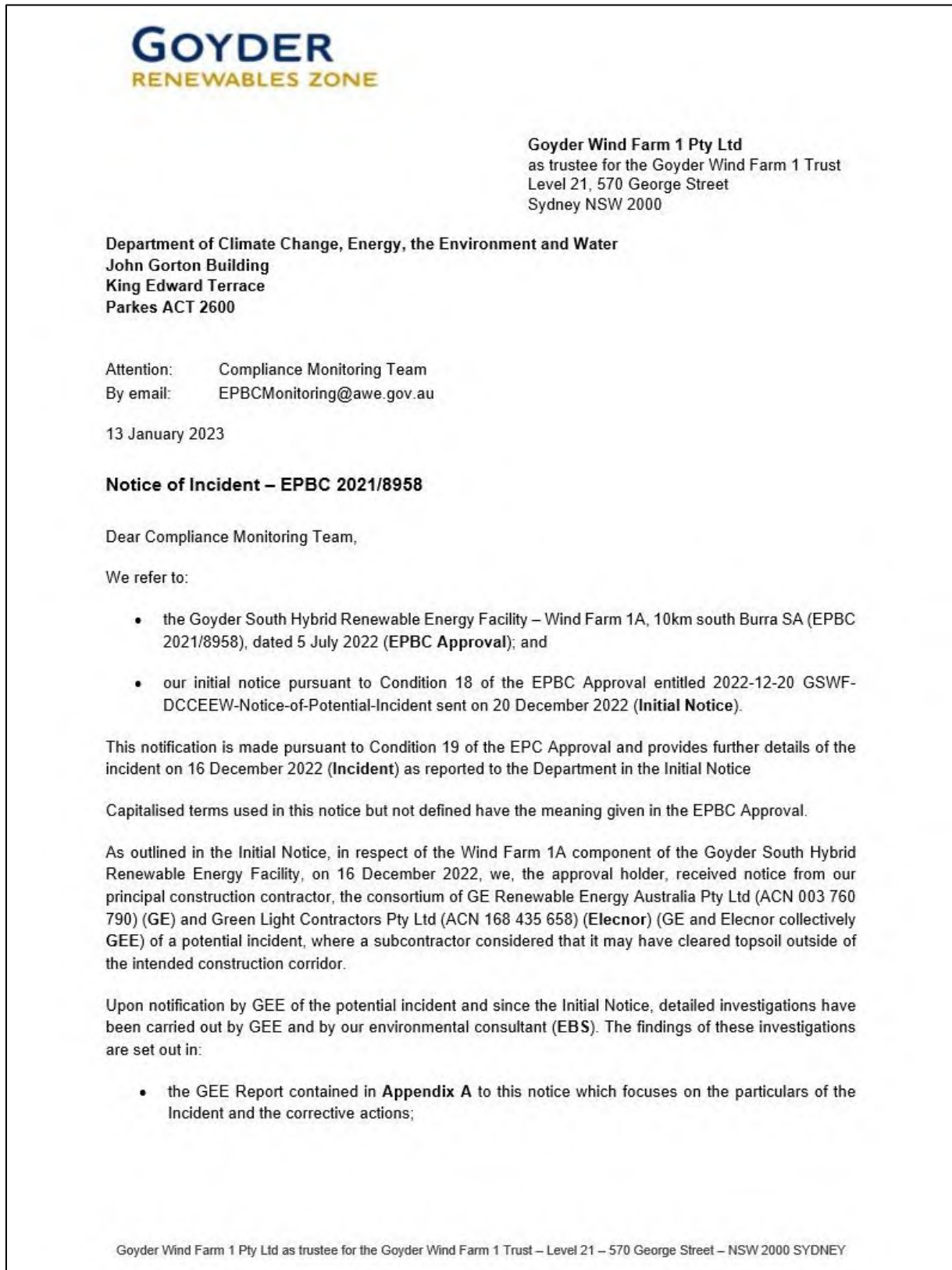


Figure 38. Incident report (page 1 of 43).

GOYDER RENEWABLES ZONE

- the EBS Report contained in **Appendix B** to this notice which focuses on the process for the management of the Pygmy Blue-tongue Lizards (PBTL's) that was followed prior to the Incident and on the assessment of the potential impact of the Incident.

We have prepared a summary of the outcome of these investigations below.

Background information:

On 18 August 2022, we informed the Department of unanticipated PBTL individual findings within the project area and outside of PBTL habitat mapped within the EPBC Approvals.

On 2 September 2022, the PBTL Recovery Team was informed of the unanticipated PBTL individual findings and management options (such as relocation and translocation) were discussed.

On 5 September 2022, GEE undertook a Pre-Clearance Check within the construction footprint of the [REDACTED] in advance of the construction works in accordance with the Construction Environmental Management Plan (CEMP). It was the first time that PBTL's were discovered in this location.

On 20 September 2022, we understood from a notice received from the Department on this date that it was agreed that a Variation to the Approval was not mandatory and that Neoen would continue following the process detailed in the CEMP for the management of the unanticipated PBTL individual findings. It was also understood that once mitigation measures would be implemented, residual impacts to those unanticipated PBTL individuals would be offset and the corresponding Offset Management Plan (OMP) would be updated accordingly.

On 11 October 2022, EBS undertook a further survey to inform micro-siting options. Subsequently, an updated design was provided by GEE which reduced the area of habitat clearance (from 0.21 ha to 0.05 ha), reduced the number of PBTL's likely to be impacted (from 12 to 2) and went around the edge of the habitat (so that the habitat was not divided in two). The new design was accordingly considered to be an appropriate outcome.

On 6 December, once micro-siting was included in the design and construction footprint was pegged on site, EBS undertook the relocation of two PBTL's within the new construction footprint and Pre-Clearance Checklist was subsequently submitted to GEE.

On 16 December 2022, after works started [REDACTED] it was identified that topsoil was cleared within the construction footprint of the original design but outside of the construction footprint of the micro-sited design (i.e. the Incident).

Incident date and location:

We confirm that the incident occurred on 16 December 2022 on the [REDACTED] within the Wind Farm 1A components of the Goyder South Hybrid Renewable Energy Facility.

Immediate actions following the Incident:

Upon the dozer operator and its supervisor suspecting that a non-compliance may have occurred, the following actions were undertaken immediately:

Goyder Wind Farm 1 Pty Ltd as trustee for the Goyder Wind Farm 1 Trust – Level 21 – 570 George Street – NSW 2000 SYDNEY

Figure 39. Incident report (page 2 of 43).

GOYDER RENEWABLES ZONE

- the dozer operator and supervisor notified GEE and a surveyor attended site and confirmed the potential incident;
- works were stopped immediately and the area was secured;
- all clearing activities were suspended site wide;
- GEE started their investigation; and
- GEE Environmental personnel undertook a site survey and no PBTL's were found in the cleared area.

Investigation of the Incident:

Detailed investigations have been carried out by GEE and EBS which included:

- review of project documentation, to review compliance with CEMP requirements;
- review of site documentation, to review controls within Pre-Clearance Checklist (PCC), Ground Disturbance Permit, SWMS, Design in GPS, ITP;
- Site Wide Audit, to confirm that there is no other location where Construction works have been undertaken outside of the latest revision of the construction footprint; and
- Site inspection, to assess the potential impact of the Incident.

The root cause and contributing factors of the Incident are set out in the GEE Report and summarised below:

- failure in technology as multiple design layers were displayed in the dozer's GPS including both the original design and the micro-sited design;
- human error as the dozer operator relied exclusively on the GPS and not on other controls such as surveyor pegs or PCC;
- poor visibility of the surveyor pegs due to vegetation growth;
- removal of no-go zone signage after surveyor pegs were installed which was not raised during weekly environmental inspections.

Corrective actions and opportunities for improvement:

Summarised below are the details of the proposed corrective actions GEE has included in the GEE Report:

- re-install no-go-zone signage [REDACTED]
- install additional visual delineators within sensitive areas that are higher than natural vegetation;
- confirm that GPS units have only the latest revision of the design uploaded and that no other layers appear;

Goyder Wind Farm 1 Pty Ltd as trustee for the Goyder Wind Farm 1 Trust – Level 21 – 570 George Street – NSW 2000 SYDNEY

Figure 40. Incident report (page 3 of 43).

GOYDER RENEWABLES ZONE

- provide additional trainings to all operators and supervisors for proper use of GPS and ensure that all controls are implemented appropriately;
- refresh site inductions and pre-starts/toolboxes to ensure that all environmental constraints are clearly understood;
- identify environmentally sensitive areas and organise pre-clearance meetings with environmental consultant, supervisors, operators and surveyors in those areas in advance of the works; and
- review weekly environmental inspection checklists to ensure that all CEMP commitments are regularly monitored on site.

The above actions are being reviewed and their implementation confirmed by our site manager prior to restart of clearing activities.

Assessment of potential impact due to the Incident:

On 21 December 2022, EBS undertook a site inspection including a survey of all the cleared area and of the spider holes within the cleared area to assess the potential impact on PBTL and PBTL habitat due to the Incident.

The details of this inspection and assessment of the potential impact are set out in the EBS Report and summarised below:

- No PBTL's were found during EBS site inspection, but considering records of surveys undertaken prior to the Incident, there is a potential impact to 12 PBTL's. Note that PBTL's move around in Spring / Summer, so it is unclear how many of the previously recorded PBTL's were present at the time of the Incident.
- It is considered that 0.21 ha of the unanticipated PBTL habitat was cleared within the construction footprint of the original design, which is 0.16 ha more than what was expected to be cleared within the construction footprint of the micro-sited design.
- Two PBTL's were relocated within the micro-sited design, which was unnecessary due to the occurrence of the Incident.
- The unanticipated PBTL habitat is now divided in two by the cleared access track.

Following a thorough investigation, EBS has confirmed that no other protected matter was impacted by the Incident, beyond the impact referred to herein and in the attached reports regarding PBTL and PBTL habitat. We regret that the Incident occurred, particularly given the activities undertaken by the approval holder in September to December 2022 (summarised in the background information section above) to develop a micro-sited design intended to further minimise the impact on PBTL and PBTL habitat. However, we acknowledge that the Incident occurred and the impact occasioned thereby to PBTL and PBTL habitat.

Proposed mitigations of our impact due to the Incident:

In order to mitigate the impact of the Incident, we propose to undertake the following actions:

Goyder Wind Farm 1 Pty Ltd as trustee for the Goyder Wind Farm 1 Trust – Level 21 – 570 George Street – NSW 2000 SYDNEY

Figure 41. Incident report (page 4 of 43).

GOYDER RENEWABLES ZONE

- Continue, pursuant to the original design, now that the impact on PBTL and PBTL habitat that was intended to be mitigated by the micro-sited design has occurred due to the Incident. If we were to revert to the micro-sited design, then rehabilitation of the works carried out pursuant to the original design would be required and thereby impact to the PBTL's would potentially be increased.
- Calculate the offset required considering the extent of the clearing of the unanticipated PBTL habitat [REDACTED] and include this offset in the PBTL OMP.
- Review whether it is possible to install two culverts across the section of the access track located within the unanticipated PBTL habitat to provide a connection between the now divided areas (like a passageway). This has not been undertaken for PBTL previously and could provide a research opportunity to determine the effectiveness of this measure for the species.

Approval holder's review:

As part of the approval holder's management of the Incident, we have reviewed the GEE Report along with our site manager and EBS and consider that the incident learnings and opportunities for improvement identified therein should be adopted. We also consider that the implementation of the corrective actions proposed by GEE will further consolidate our controls and mitigate the risk of future similar incidents.

We take our environmental compliance seriously. Despite the concerns identified, we recognise the transparent way GEE has dealt with this matter including the actions and mitigations taken on site to implement the additional controls as set out in this notice. We will continue to take proactive steps to ensure that future works are compliant with the EPBC Approval.

Please do not hesitate to contact me should you require further information in relation to this matter. We welcome any questions the Department may have regarding this incident.

Yours sincerely

Bechameil

Inès Béchameil

Construction Project Manager

Goyder Wind Farm 1 Pty Ltd as trustee for Goyder Wind Farm 1 Trust

Goyder Wind Farm 1 Pty Ltd as trustee for the Goyder Wind Farm 1 Trust – Level 21 – 570 George Street – NSW 2000 SYDNEY


Figure 42. Incident report (page 5 of 43).




Figure 43. Incident report (page 6 of 43).

INCIDENT INVESTIGATION	
INCIDENT NUMBER	INC - 007
Project Name:	Goyder South Windfarm – Stage 1A
Incident Name:	Unauthorised Clearing of topsoil at [REDACTED]
Incident Manager:	Matt Moore Position: HSE Manager
Incident Type:	Report Only <input type="checkbox"/> Near Miss <input type="checkbox"/> Injury <input type="checkbox"/> Security <input type="checkbox"/> PD <input type="checkbox"/> Environment <input checked="" type="checkbox"/>
Specific Injury Type:	<input type="checkbox"/> FAI <input type="checkbox"/> RTW <input type="checkbox"/> MTI <input type="checkbox"/> LTI <input type="checkbox"/> FAT Other: <input type="checkbox"/> NIL
IP Status (if applicable):	N/A
Potential Severity:	Insignificant <input type="checkbox"/> Minor <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> Major <input type="checkbox"/> Catastrophic <input type="checkbox"/>
Actual Severity:	Insignificant <input type="checkbox"/> Minor <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> Major <input type="checkbox"/> Catastrophic <input type="checkbox"/>
Investigation Level:	Standard Investigation: <input checked="" type="checkbox"/> ICAM Investigation: <input type="checkbox"/> Other: <input type="checkbox"/>
Statutory Notification Required:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Report To: DCEWW Compliance Team Reference No: N/A Date & Time: D: 20/12/2022
Incident Date:	16/12/2022 Incident Time: 15:00 hrs Date & Time Reported: D: 16/12/2022 T: 15:31 hrs
Incident Location:	[REDACTED]
Weather Conditions:	Sunny Temperature: 27c
Description of incident:	
<p>1. Description of Incident</p> <p>On the 16th of December 2022, a LUCAS dozer operator (Plant ID: DZR023) was located at road 3, [REDACTED]. The operator was stripping topsoil towards [REDACTED] as per the design in his machine. At approximately 1:50pm the supervisor was driving the operator back to his machine after lunch. The supervisor has a GPS rover installed on his light vehicle and routinely checks work against the model to ensure accuracy and track production output. It was discovered that the track was out of alignment at [REDACTED] in a location where the previously alignment access track forked from the new alignment.</p> <p>The GPS model data in DZR023 and the rover were checked for accuracy. Both screens showed a file titled Phase 1 Rev 4, reflective of the current IFC model. Further investigation found the line work between both files differed.</p> <p>Upon discovery of the discrepancy all works stopped immediately and the supervisor requested GLC engineer and surveyors Alexander & Symonds to attend the potential incident location to clarify. After confirmation that the area cleared was within the previous alignment, GEE Management was notified, the area was secured, and an investigation commenced.</p> <p>GE further notified the Incident to Principal same day 16th Dec, followed by written Notification on 18th December 2022</p>	







Figure 44. Incident report (page 7 of 43).

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Extent of Clearing




Legend:

	Previous alignment (Phae 1 Revs 0 – 3)		PBTL Locations (SE)
	New Alignment (Phase 1 Rev.4)		PBTL Locations (EBS)
	Area Cleared (approximately 0.48 Ha)		Pegged survey pts of new alignment

2. Timeline

Date	Time	Action
16-Nov-2022		██████ Rev. 4 model. Downloaded by LUCAS via WeTransfer
18-Nov-2022		██████ Rev. 4 model uploaded to all LUCAS plant on site
01-Dec-2022		Confirmation from LUCAS received by GLC that all LUCAS plant updated with ██████ rev.4 model.
04-Dec-2022		New alignment of ██████ pegged by Alexander & Symonds

Figure 45. Incident report (page 8 of 43).

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06-Dec-2022		EBS Ecology conducts PBTl relocations on access track between [REDACTED]
08-Dec-2022		Pre-clearance Check (PCC) from EBS ecology received by GLC (EBS_Ecology_PCC_[REDACTED].pdf)
		Pre-clearance briefing review of PCC by GLC Environmental Advisor, including environmental management considerations shared with GLC/LUCAS supervision and HSE
12-Dec-2022		Ground disturbance permit #233 issued by GE. Work location [REDACTED] to [REDACTED] identified within scope.
16-Dec-2022	06:30	Daily prestart meeting conducted. Topsoil strip to [REDACTED] was a planned task for the shift.
	11:50	DZR023 operator reports that he was clearing in the vicinity of chainage 1400.
	13:50	Supervisor discovered discrepancy with alignment at chainage 1400.
	14:05	Report and check issue with Sean Hogan
	14:45	Alexander Symonds surveyor, GLC (Dylan Giles) and Lucas (Matthew Jarvis) check over area and determine the extent of the issue
	15:00	Lucas TCS Project Manager notified GLC Management of potential discrepancy EVENT
	15:15	Lucas TCS Project Manager notified approximately 100m of topsoil strip is outside the design footprint.
	16:21	Incident notification issued from Lucas TCS to GLC
	16:30	Investigations commence


3. Additional Information

3.1 Ground Disturbance Permit (GE Permit # 233) and supporting documentation

The ground disturbance permit provides Lucas TCS with the authority to conduct works in the areas defined under the work location, in line with the scope of works entered and in accordance with the SWMS listed.

- The Pre-clearance Check (EBS_Ecology_PCC_[REDACTED].pdf) was included in the permit request and attached to the permit as supporting documentation.
- The PCC contained a map showing the location of the relocated PBTl's. The operator did not consult the PCC map, instead relying on the GPS data contained in the dozer for accuracy.

Figure 46. Incident report (page 9 of 43).

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- The permit refers to identification of environmentally sensitive areas had been identified on site as no go areas, the operator assumed that the Rev 4 model would eliminate the potential incursion into a nearby sensitive area by design.

3.2 Physical Demarcation of Alignment

The new alignment had been pegged by Alexander & Symonds prior to the Pre-clearance check and relocation of PBTL's by EBS Ecology on the 6th December.

The survey pegs of the upper extent of the new alignment to the south of the cleared area are visible in the image below (left) which the operator believed confirmed he was within the new alignment. The operator did not stop to clarify his location as the identification of the survey pegs adjacent to his work area gave him reassurance that the design he was following on the GPS was correct.

The pegs outlining the southern extent of the new corridor, indicated in the image below (right) were some distance away from the operator and not clearly visible due to vegetation height in the area.



3.3 SWMS

Figure 47. Incident report (page 10 of 43).



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<p>The issued permits reference the relevant SWMS for the task and hold relevant control measures that were agreed through consultation between Lucas TCS, GLC project teams and the workers involved with the task.</p> <p>Operation of Bulldozer SWMS</p> <ul style="list-style-type: none"> • Reviewed and signed off by the operator and supervisor on SWMS on 13th of December. • Includes requirement to ensure operator is aware of boundary limits and to not over clear vegetation. • Areas with native flora and fauna identified in the CEMP are communicated to personnel and identified. • A GE permit to work to be obtained. <p>Road and Hardstand civil works SWMS reviewed and signed off by the operator and supervisor on SWMS on 13th of December.</p> <ul style="list-style-type: none"> • Includes requirement to obtain vegetation clearance permit or permission from GLC prior to works commencing. • Requires work within the construction area footprint and areas checked for significant sites or significant vegetation prior to works commencing. • That areas with native flora and fauna identified in the GLC EMP are communicated to personnel and identified. <p>3.4 CEMP (FFMP)</p> <p>The Construction Environment Management Plan (CEMP) and associated sub-plan Flora and Fauna Management Plan (Table 9) requires the following management actions with respect to Likely/Known Pygmy Blue-tongue Lizard (PBTL) Habitat or Pygmy Blue Tongue Lizards:</p> <ul style="list-style-type: none"> • All clearance and stockpiling to be kept within approved areas - Compliant, as clearing was as per the design and within the project area defined under the EPBC Approval. • Micro-siting infrastructure to meet limitations and to avoid division of mapped populations - Compliant, as this was not a population mapped under the EPBC Approval but an unanticipated discovery. • Pre-clearance check to confirm final design meets limitation and detect any PBTL present - Compliant, PCC's were undertaken prior to start of work to confirm final design and detect PBTL's present. • Where PBTL's are found and impact is unavoidable, follow the relocation procedure outlined in section 12 of the PBTL Management Plan (Appendix 2) – Compliant, as PBTL were relocated from the new design. • All clearance to be kept within the defined impact areas - Compliant under the EPBC Approval, but Non-Compliant under the CEMP (as the intent was to follow the new design as a mitigation after PBTL's were discovered). • Flagging of item boundary as exclusion zone - Non-Compliant as exclusion zones were not flagged. Prior to the pegging of the new alignment, the area was flagged as a No-Go Zone however once the new corridor was pegged as it was believed that this would be a greater control and No-Go zones were not reinstated. No-Go zones have since been reinstated around the cleared area. • Site inductions to inform contractors of works limitations – Compliant, this information is in the Induction Compliant in Standard induction. • Information on the species to be distributed to construction personnel and on display – Compliant, on display in offices and crib rooms. • Inspections and audits to confirm works limitations implemented – Compliant, PCC's and Inspections by both SE and EBS and Alexander Symonds confirm this for new corridor. • Application of variations to approved clearances, if changes to project design are required, before the clearance is undertaken – Compliant, DCCEEW has been consulted and it was confirmed that variation was not required in this location. <p>3.5 [REDACTED] Rev.4 Model</p> <p>As per the timeline above, LUCAS plant GPS devices were updated with the new design revision [REDACTED] Rev. 4 on approximately the 18th November. It is believed that when the model was uploaded to DZR023 although the model title in the GPS indicated the latest design revision, the original line work data has been retained along with the new design. As per the images below left, the operator had both alignments in the GPS and assumed this was correct and true.</p>						

Figure 48. Incident report (page 11 of 43).




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Multiple design layers displayed in dozer GPS unit

3.6 ITP



INSPECTION AND TEST PLAN												
Item No.	Description / Test Point	Reference	Requirement	Frequency	Completed	By	Date	By	Date	By	Date	Notes
1. Preparation												
1.1	Verify set out		Confirm	Once	Y	SLP	18	SLP	18	PE		
1.2	Assemble (Landscape, Cultural Heritage, Environmental PCC, Development Approval)	GD01	Confirm Obtain permit to work	Once	Y	SLP	18	SLP	18	PE		
1.3	Underground services / DPOs	GD02 records	Obtain excavation permit	Weekly	Y	SLP	18	SLP	18	PE		
2. Construction												
2.1	Clearing and grubbing	GD04-4.2.2.2.1.1 (CV-SPS-4882) (Section 2.4.1)	Removal of Topsoil and vegetation as required Regrade surface to original	As	Y	SLP	18	SLP	18	PE		
2.2	Formation Layer	GD01-2.2.2.2.1.1 (CV-SPS-4882) (Section 2.2)	100% 2000-20mm natural soil or OOT 100% 150mm per 100mm depth or refusal	1/500m	Y	SLP	18	SLP	18	PE		Test Reports

ITP showing steps 1.1, 1.2 and 1.3 completed prior to commencement of construction activities on [REDACTED]

Figure 49. Incident report (page 12 of 43).


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<p>4. Contributing Factors</p> <ol style="list-style-type: none"> a. Human Factors - HF1 Complacency / motivation – The operator’s over-reliance of the GPS unit in the dozer is a contributing factor. Although the area had been pegged and environmental management measures were documented in the PCC supporting the Permit, the operator was complacent by relying solely on the design of the GPS data displayed in the dozer. b. Absent or failed defences – DF 14 Risk Controls – Failed – Although there were multiple controls in place (including but not limited to, the pegging of the new alignment, the requirement of the PCC to be attached to the permit, the ITP etc) implemented and adhered to, this event identified a failure in the technology used, which was not identified in the assessment of risk for the task. c. Workplace Conditions - TE23 Other Factor - Visibility – Pegging of the new alignment by surveyors was undertaken as an environmental control to delineate areas of environmental concern. Whilst the operator identified the pegs on the northern extent of the new alignment, the pegs of the southern extent of the new alignment were difficult to see due to vegetation growth. The inability to identify all the pegs in the extent of the alignment is a contributory factor. d. Absent or Failed Defences – DF 14 – Risk Controls – Failed – Once PBTLs had been relocated from this area, no controls were put in place to identify the remaining extent of the No-Go Zone with reliance only on GPS without any visual signage which would have alerted the operator. <p>Root Cause</p> <p>IT 14 Equipment Use error or violation – Although there are multiple contributing factors, the operator followed the design in the GPS unit in the dozer. The design (██████ Rev. 4) had been loaded into the GPS unit of the dozer; however previous designs had not been removed. The presence of multiple design layers being displayed on the GPS unit in the dozer has directly resulted in the realisation of the event. The error in uploading the new design without removing previous designs is the root cause of the incident.</p> <p>5. Immediate Actions Taken:</p> <ol style="list-style-type: none"> a. Upon confirmation of the discrepancy work was stopped and the area was secured. b. All clearing activities site wide suspended along with relevant permits. c. GEE Notified and investigation commenced. d. GLC Environmental advisor attended the location to determine if any PBTL’s had been impacted in the PBTL Habitat that had been cleared without authorisation. <p>During the course of investigation the Contractor’s Investigation Team identified a Corrective and Preventive Actions Plan that is articulated in page 13- 15 of this report</p> <p>Incident Learnings and Opportunities for Improvement:</p> <ul style="list-style-type: none"> • Opportunity to provide additional education and training to relevant Supervisors to ensure all GSWF Project requirements are communicated clearly prior to a new task starting. • Reliance on technology cannot be used as a mean of controlling the risk. Additional risk controls need to be communicated and used when they are provided. • Opportunity for improvement: Works Limitations to be communicated via toolbox with site personnel to refresh requirements and works limitations outlined in Site Induction. • Opportunity for improvement: Pre-clearance meeting to include environmental advisor/supervisor/operators/Surveyors for sensitive area prior to any clearing activities. This has been addressed in actions 1 and 5 on pages 12-14 of this report. • Opportunity for improvement: Weekly Environmental Inspection checklists to be reviewed and updated to ensure commitments of the FFMP are being checked regularly on site. • Audit to ensure prior compliance: Site-wide audit to be conducted to compare topsoil stripping meets design in all other areas to ensure the event is the only location where unauthorised clearing has occurred. 						

Figure 50. Incident report (page 13 of 43).


		INTEGRATED MANAGEMENT SYSTEM INCIDENT INVESTIGATION FORM			Doc. No.: GLC-IMS-HSE-FRM-024 Rev.: 00 Date: 04/08/2020 Page 8 of 14		
PERSONS INVOLVED							
1st Person Involved Name:		Terry Stradley		Age:	61	Date of Birth: 22/08/1961	
Sex:	<input checked="" type="checkbox"/> M	<input type="checkbox"/> F	<input type="checkbox"/> O	Position:	Plant Operator	Employer:	LUCAS TOTAL CONTRACT SOLUTIONS PTY LTD
Home Address:		76 Hunters Road, Lower Light SA 5501					
Shift Start Time:		06:30hrs	Break Times:	13:00hrs	Shift finish time:	18:00hrs	
Shift		<input checked="" type="checkbox"/> Day	<input type="checkbox"/> Night	Roster:	4 of 10 days	<input checked="" type="checkbox"/> On-site	<input type="checkbox"/> Off-site
Task performed:		Clearing of topsoil at [REDACTED]					
Time in Occupation:		21 years	Time on Project:	4 months			
Manager/Supervisor:		Ian Kilner / Matt Jarvis					
Injuries:		Nil					
Drug/Alcohol Test:		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Result:	<input type="checkbox"/> Positive	<input checked="" type="checkbox"/> Negative	<input type="checkbox"/> Non-Negative
Just Culture:		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No				
2nd Person Involved Name:		Matt Jarvis		Age:	36	Date of Birth: 12/06/1986	
Sex:	<input checked="" type="checkbox"/> M	<input type="checkbox"/> F	<input type="checkbox"/> O	Position:	Supervisor	Employer:	LUCAS TOTAL CONTRACT SOLUTIONS PTY LTD
Home Address:		5 Drysdale Drive Trott Park, SA 5158					
Shift Start Time:		06:30 hrs	Break Times:	1300 hrs 1345 hrs	Shift finish time:	1800 hrs	
Shift		<input checked="" type="checkbox"/> Day	<input type="checkbox"/> Night	Roster:	4 of 10 days	<input checked="" type="checkbox"/> On-site	<input type="checkbox"/> Off-site
Task performed:		Supervision of Lucas Civil Crew					
Time in Occupation:		10 years	Time on Project:	4 months			
Manager/Supervisor:		Ian Kilner					
Injuries:		Nil					
Drug/Alcohol Test:		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Result:	<input type="checkbox"/> Positive	<input checked="" type="checkbox"/> Negative	<input type="checkbox"/> Non-Negative
Just Culture:		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No				

Figure 51. Incident report (page 14 of 43).


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INJURED PERSONS INVOLVED								
Injured Person Name:		N/A			Age:		Date of Birth:	
Sex:	M	F	O	Position:		Employer:		
Home Address:								
Injury Classifications:								
Nature of Injury or Disease:						Mechanism of Injury or Disease:		
Bodily Location of Injury or Disease:						Breakdown Agency:		
Lost Time / RTW Incidents:								
Number of Days Lost this month:						Resumption of Normal Duties:		/ /
Number of Days RWC this month:						Resumption of Normal Duties:		/ /
Details of immediate actions taken for injured person:								

Figure 52. Incident report (page 15 of 43).


		INTEGRATED MANAGEMENT SYSTEM INCIDENT INVESTIGATION FORM		Doc. No.: GLC-IMS-HSE-FRM-024 Rev.: 00 Date: 04/08/2020 Page 10 of 14
PART B (INCIDENT INVESTIGATION)				
Contributing Factors				
Defences that were absent/ failed:				
DF1 Detection Systems <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF2 Protection Systems <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF3 Warning Systems <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF4 Guards or Barriers <input type="checkbox"/> Absent <input type="checkbox"/> Failed	
DF5 Control Systems <input type="checkbox"/> Absent <input checked="" type="checkbox"/> Failed	DF6 Recovery/ Back-up Systems <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF7 Escape <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF8 Rescue <input type="checkbox"/> Absent <input type="checkbox"/> Failed	
DF9 Safety Device Operation <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF10 PPE Suitability/Availability <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF11 Safe Work Instructions <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF12 Hazard Awareness <input type="checkbox"/> Absent <input type="checkbox"/> Failed	
DF13 Hazard Identification <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF14 Risk Controls <input type="checkbox"/> Absent <input checked="" type="checkbox"/> Failed	DF15 Supervision <input type="checkbox"/> Absent <input type="checkbox"/> Failed	DF16 Other <input type="checkbox"/> Absent <input type="checkbox"/> Failed	
Other Contributing Factors:				
Individual/Team Actions:				
<input type="checkbox"/> IT1 Supervisory Error or violation	<input type="checkbox"/> IT5 PPE use error or violation	<input type="checkbox"/> IT9 Horseplay/ thrill seeking error or violation	<input type="checkbox"/> IT13 Occupational hygiene practices	
<input type="checkbox"/> IT2 Operating authority error or violation	<input type="checkbox"/> IT6 Procedural compliance	<input checked="" type="checkbox"/> IT10 Hazard recognition/perception	<input type="checkbox"/> IT14 Other	
<input type="checkbox"/> IT3 Operating Speed	<input type="checkbox"/> IT7 Change management error	<input type="checkbox"/> IT11 Hazard management error or violation		
<input checked="" type="checkbox"/> IT4 Equipment use error or violation	<input type="checkbox"/> IT8 Equipment/materials handling error or violation	<input type="checkbox"/> IT12 Work method error or violation		
Workplace Conditions:				
<input type="checkbox"/> TE1 Task planning/preparation/manning	<input type="checkbox"/> TE7 materials availability and suitability	<input type="checkbox"/> TE13 Fire and / or explosion hazard	<input type="checkbox"/> TE19 radiation	
<input type="checkbox"/> TE2 Hazard Analysis/Job safety Analysis/ Take 5	<input type="checkbox"/> TE8 Equipment integrity	<input type="checkbox"/> TE14 Lighting	<input type="checkbox"/> TE20 Chemical	
<input type="checkbox"/> TE3 Work procedures availability and suitability	<input type="checkbox"/> TE9 Housekeeping	<input type="checkbox"/> TE15 Equipment / Material temperature / conditions	<input type="checkbox"/> TE21 Wildfire	
<input type="checkbox"/> TE4 Permit to work availability/suitability	<input type="checkbox"/> TE10 Weather conditions	<input type="checkbox"/> TE16 Noise	<input type="checkbox"/> TE22 Surface gradient / conditions	
<input type="checkbox"/> TE5 Abnormal operational situation / condition	<input type="checkbox"/> TE11 Congestion/ restriction / access	<input type="checkbox"/> TE17 Ventilation	<input type="checkbox"/> TE23 Other factor	
<input type="checkbox"/> TE6 Tools / Equipment condition / availability	<input type="checkbox"/> TE12 Routine / non-routine task	<input type="checkbox"/> TE18 Gas, dust or fumes		

Figure 53. Incident report (page 16 of 43).


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Human Factors:				
<input type="checkbox"/> HF1 Complacency / motivation	<input type="checkbox"/> HF8 Physical capabilities	<input type="checkbox"/> HF15 Distraction/ Pre-occupation	<input type="checkbox"/> HF22 Passive tolerance of violations	
<input type="checkbox"/> HF2 Drugs / Alcohol influence	<input type="checkbox"/> HF9 Mental capabilities	<input type="checkbox"/> HF16 Experience/ knowledge/ Skill for task	<input type="checkbox"/> HF23 Perceived license to bend rules	
<input type="checkbox"/> HF3 Familiarity with task	<input type="checkbox"/> HF10 Physical stress	<input type="checkbox"/> HF17 Competency	<input type="checkbox"/> HF24 Change to routine	
<input type="checkbox"/> HF4 Fatigue	<input type="checkbox"/> HF11 mental Stress	<input type="checkbox"/> HF18 Behavioural beliefs (gains > risks)	<input type="checkbox"/> HF25 Reliance on undocumented knowledge	
<input type="checkbox"/> HF5 Situational Awareness	<input type="checkbox"/> HF12 Confidence level	<input type="checkbox"/> HF19 Personality / attitude	<input type="checkbox"/> HF26 Other human factors	
<input type="checkbox"/> HF6 Time/ Productivity pressures	<input type="checkbox"/> HF13 Secondary goals	<input type="checkbox"/> HF20 Poor Communications		
<input type="checkbox"/> HF7 Peer pressure/ supervisory example	<input type="checkbox"/> HF14 persons Issues	<input type="checkbox"/> HF21 Poor shift patterns and overtime working		
Organisational Factors:				
<input type="checkbox"/> HW Hardware	<input type="checkbox"/> IG Incompatible Goals	<input type="checkbox"/> RM Risk Management	<input type="checkbox"/> RI Regulatory Influence	
<input type="checkbox"/> TR Training	<input type="checkbox"/> PR Procedures	<input type="checkbox"/> MC Management of Change	<input type="checkbox"/> OL Organisational Learning	
<input type="checkbox"/> OR Organisation	<input type="checkbox"/> MM Maintenance management	<input type="checkbox"/> CM Contractor Management	<input type="checkbox"/> VM Vehicle Management	
<input type="checkbox"/> CO Communication	<input type="checkbox"/> DE Design	<input type="checkbox"/> OC Organisational management	<input type="checkbox"/> MS Management Systems	

Figure 54. Incident report (page 17 of 43).


		INTEGRATED MANAGEMENT SYSTEM INCIDENT INVESTIGATION FORM			Doc. No.: GLC-IMS-HSE-FRM-024 Rev.: 00 Date: 04/08/2020 Page 12 of 14	
Corrective and Preventive Actions:						
Code:	Factor:	Corrective Action:	Type:	Due Date:	Assigned to:	Status:
1	Human Factors - HF1 Complacency / motivation	GLC to ensure all plant operators understand and are competent in the process of referencing GPS data to provided drawings, prior to commencing clearing, which are included in the work pack for the scope of work. This will be documented in the Clearing Activities Permit Meeting prior to all clearing activities.	Administrative	14/01/2023	Phil Cavanagh	Open
2	DF 14 Risk Controls	GLC to ensure all operators are trained in the use of GPS units to identify that the current version of the design is loaded into the unit and that only the current version (no previous versions) of the design is loaded into the GPS unit.	Administration	14/01/2023	Phil Cavanagh	Open
3	TE23 Other Factor	Additional visual delineators, being star pickets with 2m Orange conduit are erected to identify and control sensitive areas are visible above the natural vegetation and can be used as a visual aid.	Engineering	14/01/2023	Phil Cavanagh	Open

Figure 55. Incident report (page 18 of 43).


		INTEGRATED MANAGEMENT SYSTEM INCIDENT INVESTIGATION FORM			Doc. No.: GLC-IMS-HSE-FRM-024 Rev.: 00 Date: 04/08/2020 Page 13 of 14	
4	DF 14 – Risk Controls	GLC to install no go zones and signage in the area where the PBLT were relocated to provide a visual reference to keep workers out of this delineated area	Administration / Isolation	14/01/2023	Phil Cavanagh	Open
5	DF 14 – Risk Controls	GLC Supervisors to communicate all permit requirements at Clearing prestart meetings (Clearing Activities Permit Meeting), ensuring all mobile plant operators visually check the designated work maps, delineation, drawing, no go zones, etc. associated with the permit prior to commencing any clearing task.	Administration	14/01/2023	Phil Cavanagh	Open
6	DF 14 – Risk Controls	All GPS units currently being used on the GSWP project in mobile plant to be checked to ensure outdated versions of drawings have been removed / deleted	Administrative	14/01/2023	Phil Cavanagh	Open
7	OFI	Site-wide audit to be conducted to compare topsoil stripping meets design in all other areas to ensure the event is the only location where unauthorised clearing has occurred.	Administrative	14/01/2023	Matthew Moore	Open

Figure 56. Incident report (page 19 of 43).


		INTEGRATED MANAGEMENT SYSTEM INCIDENT INVESTIGATION FORM			Doc. No.: GLC-IMS-HSE-FRM-024 Rev.: 00 Date: 04/08/2020 Page 14 of 14	
8	OFI	Weekly Environmental Inspection checklist to be reviewed to ensure FFMP commitments are captured and documented.	Administrative	14/01/2023	Matthew Moore	Open
9	OFI	Toolbox to be delivered to site personnel to refresh induction information regarding the works limitations regarding PBTL Habitat (Potential/Likely).	Administrative	14/01/2023	Gavin Nicholson	Open
Incident review & Investigation approval:						
Project Managers Name:	Jose Joven	Signature/Initial:	MM	Date:	23 / 12 /2022	
HSE Manager Name:	Matthew Moore	Signature/Initial:	JJ	Date:	23 / 12 /2022	

Figure 57. Incident report (page 20 of 43).

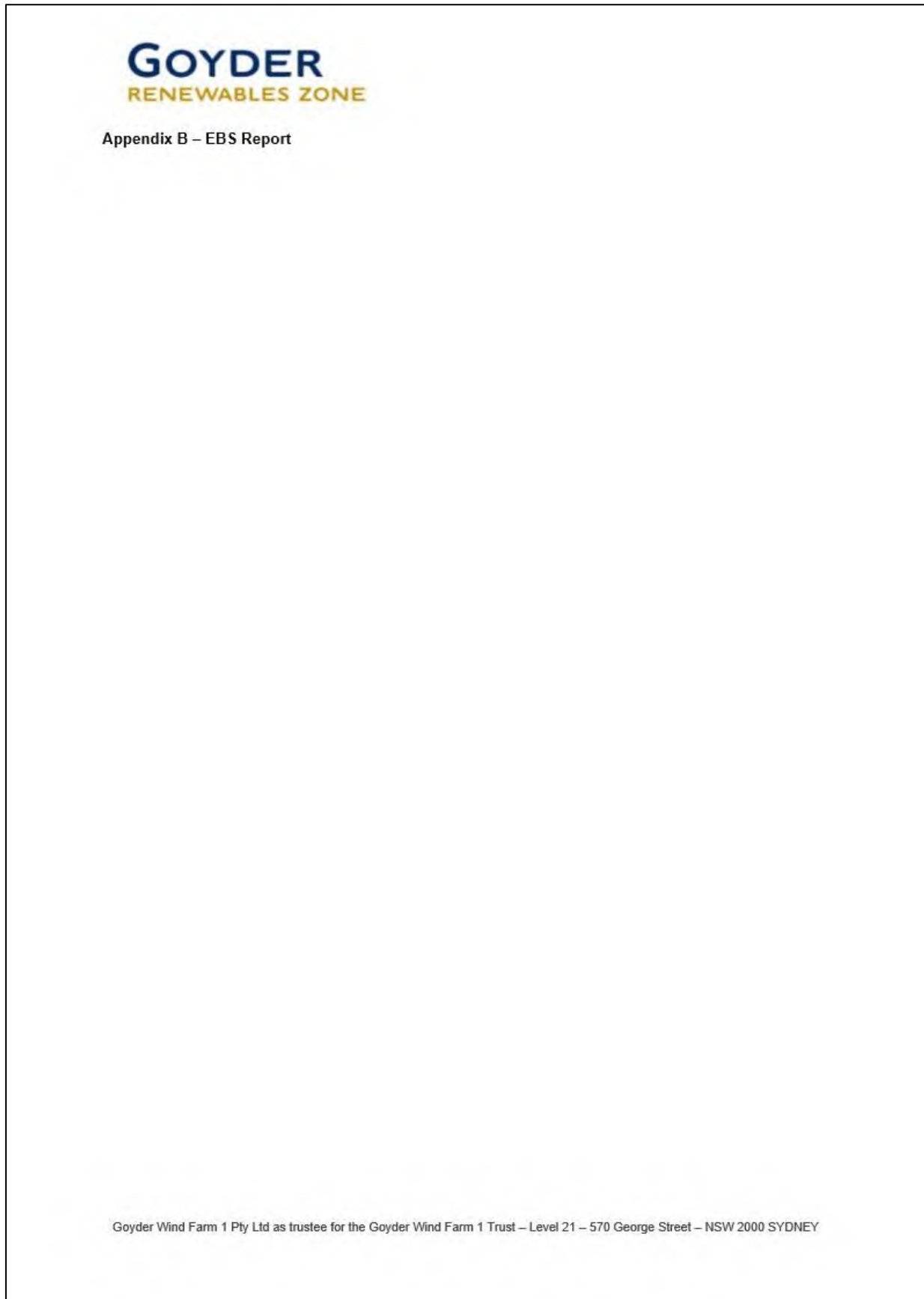


Figure 58. Incident report (page 21 of 43).

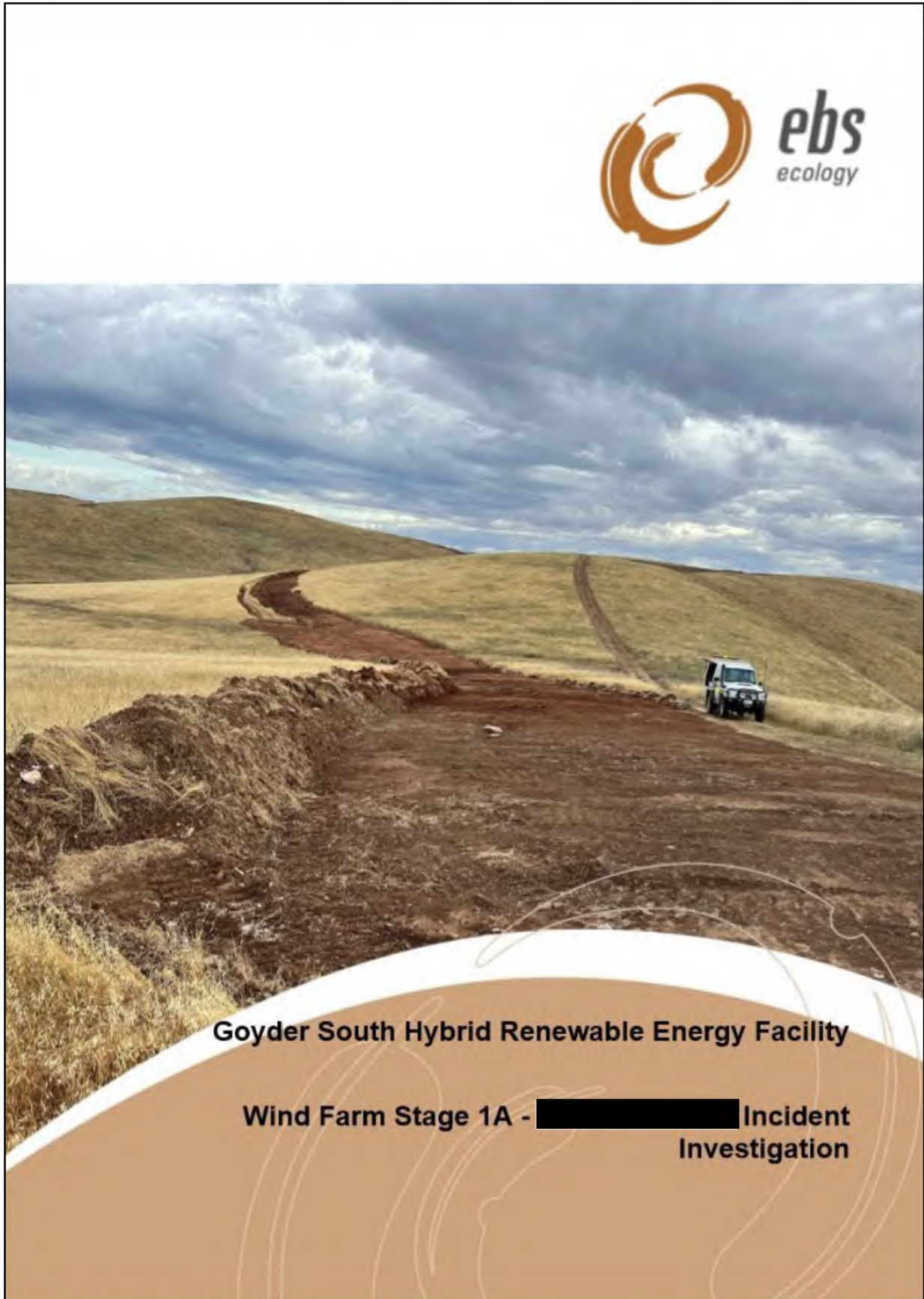


Figure 59. Incident report (page 22 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

12 January 2023

Version 1.2

Prepared by EBS Ecology for Neoen

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Cover photograph: General photo of topsoil clearance along [REDACTED]

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Figure 60. Incident report (page 23 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

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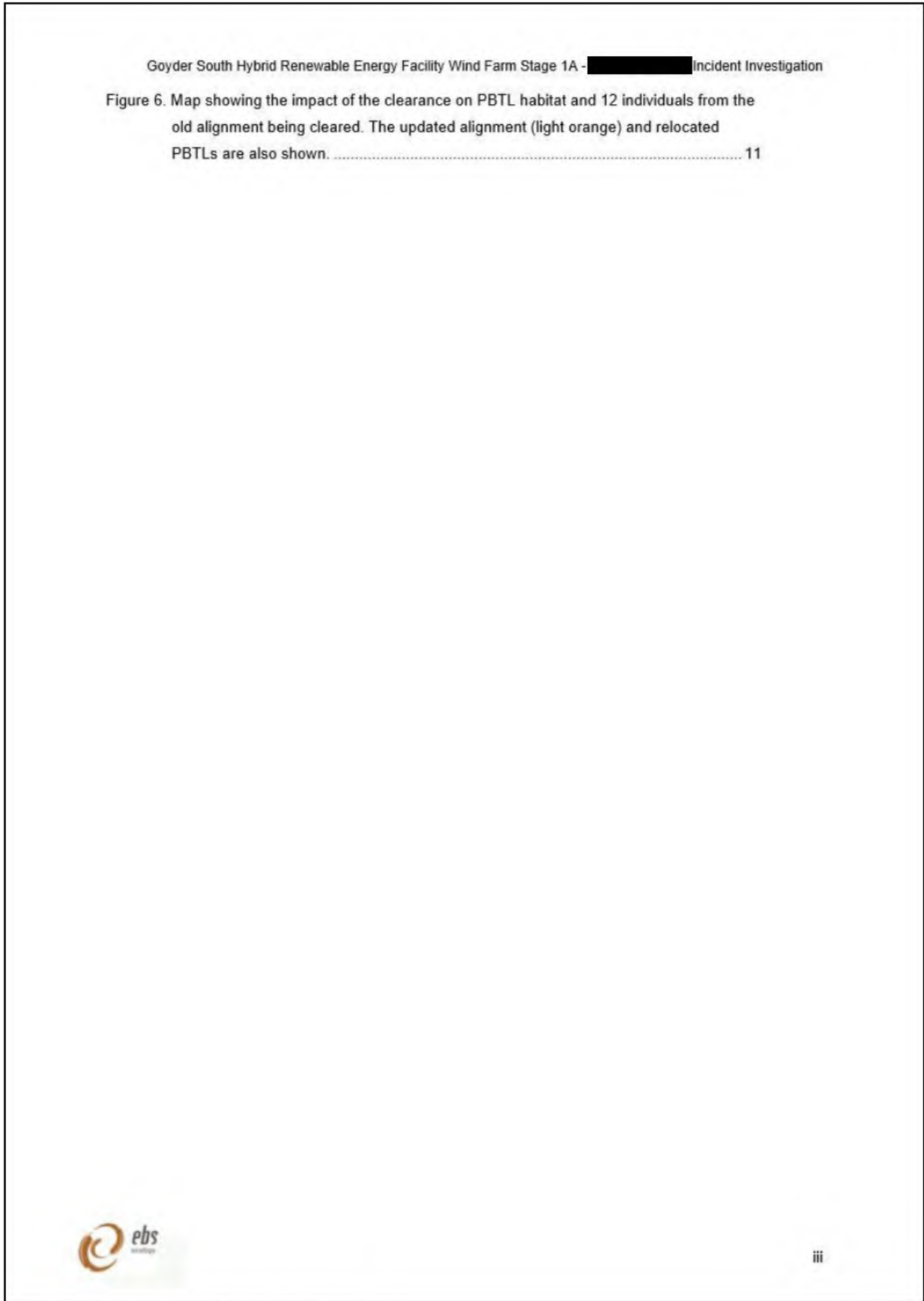


Figure 62. Incident report (page 25 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

1 PROJECT OVERVIEW

The Goyder South Hybrid Renewable Energy Facility (the Goyder South Project, the Project), which is located between Burra and Robertstown, approximately 5 kilometres (km) south of Burra and consist of the following components:

- Wind Farm Stage 1A;
- Wind Farm Stage 1B; and
- Overhead Transmission Line (OTL) and Substation West.

NEOEN Australia Pty Ltd (NEOEN) is contracted by Goyder Wind Farm 1 Pty Ltd; Goyder Wind Farm 1B Pty Ltd; and Goyder Wind Farm Common Asset Pty Ltd to ensure compliance with the EPBC approvals on behalf of the Project.

Wind Farm Stage 1A and Wind Farm Stage 1B involve the construction and operation of 38 (Stage 1A; 209 MW) and 37 (Stage 1B; 203 MW) wind turbine generators, and associated infrastructure, including temporary construction compounds and a temporary concrete batching plant, access tracks, hardstands, underground cabling and meteorological masts. Once operational, Wind Farm Stage 1A and Wind Farm Stage 1B will produce 209 MegaWatts (MW) and 203 MW respectively.

Several Matters of National Environmental Significance (MNES) occur or potentially occur within the Project Site. The Project received approval under the EPBC Act with a series of approval conditions and management plans that require implementation.

EBS Ecology has been engaged by NEOEN Australia Pty Ltd to undertake extensive ecological surveys across the Project Area, provide technical advice and assist in the required approval processes. Populations of the nationally endangered Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis*) (PBTL) are known to occur within the Project Site. Areas of possible PBTL habitat also occurs within the Project Site. EBS Ecology prepared the PBTL Management Plan for the project and has worked extensively on developing the management requirements for PBTL and PBTL habitat. EBS Ecology have also been engaged to relocate or translocate PBTL that are found within the construction footprint. Succession Ecology are the construction contractors sub consultant ecologist engaged to undertake the environmental Pre-Clearance Checks and Assessments.

This EBS Ecology report focuses on the processes that have been implemented for the management of PBTL on the project and the impact of the incident being investigated on PBTL and PBTL habitat. The Incident Report prepared by the GE Renewable Energy / Green Light Elecnor (GEE) construction team focuses on the particulars of the incident and the corrective actions required.



1

Figure 63. Incident report (page 26 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

2 EPBC APPROVAL AND UNEXPECTED DISCOVERIES

2.1 Conditions of EPBC Approval

Prior to commencement of construction of the Project, approval was received under the *Environment Protection and Biodiversity Conservation (EPBC) Act 1999* to construct the Project on the basis of meeting a set of approval conditions.

A summary of the relevant project documentation is provided below:

- GSWF -ELEC-NOR-MAN-PLN-0005-Rev 3-Flora & Fauna Management Plan
- GSWF-ELEC-NOR-EHS-PLN-0005-Rev 13-Construction Environmental Management Plan
- Goyder South Project PBTL Management Plan
- Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A – EPBC 2021/8958 – Approval Documentation

One of the Matters of National Environmental Significance (MNES) on the Project is the presence of the nationally endangered Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis*) (PBTL) and its habitat. Approval conditions specific to the PBTL for Wind Farm Stage 1A (EPBC 2021/8958) of the project include:

- Not exceeding clearance of more than 8.04 ha of mapped PBTL habitat (refer to Attachment C in the approval conditions for mapped PBTL habitat)
- Implementation of the approved PBTL Management Plan
- Implementation of the approved Construction Environmental Management Plan (CEMP)
- Develop and implement an Offset Management Plan (OMP) for PBTL's
- Develop and implement a PBTL Scientific Monitoring and Research Plan

Refer to the conditions of approval attached to the EPBC 2021/8958 approval for more specific detail.

2.2 Unexpected Discoveries

The approved PBTL Management Plan (PBTL MP) outlines the process on how to manage unexpected discoveries of PBTLs and PBTL habitat. Section 7 of the PBTL MP states that if PBTL individuals or populations are discovered (in areas not previously identified as PBTL habitat), the following actions are required:

- All works will cease in the immediate vicinity until an appropriately qualified ecologist provides advice and relocates PBTLs if necessary;
- The area is designated as PBTL habitat and the management measures outlined in Section 10 and Section 11, of the PBTL MP, are to be implemented; and
- The PBTL Recovery Team is to be notified (refer to Table 29 for contact details)



Figure 64. Incident report (page 27 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

A key requirement implemented on the Project, as per the approval documentation, is undertaking Pre-Clearance Checks (PCC) throughout the construction footprint across the Project Site. If, during a PCC, it is identified that additional PBT habitat or PBT populations are present, then the following process is undertaken (as per the PBT MP):

- Undertake additional targeted surveys to determine extent of habitat and / or population (for example, adjacent to the construction footprint to understand potential options for alternate design to minimise impacts)
- Re-classify habitat based on survey findings
- Investigate micro-siting / redesign options to minimise impact
- Implement approved management plan requirements

Figure 65. Incident report (page 28 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

3 UNEXPECTED PBTL POPULATION FIND

An additional sub-population of PBTLs was located on the proposed [REDACTED] [REDACTED] as part of the required Pre-Clearance Checks undertaken by the Contractors ecological consultant (Succession Ecology) in late August 2022 and early September 2022. The following section documents the process that was implemented as a result of the discovery of this population of PBTL.

3.1 Pre Clearance Check Surveys

The discovery of an additional sub-population of PBTLs located on the proposed [REDACTED] [REDACTED] is detailed in a Memo by Succession Ecology (5th of September 2022) which was prepared as a result of undertaking a Pre-Clearance Check (Appendix 1). The records supplied by Succession Ecology (as shown in Figure 1) indicate the location of [REDACTED] individual PBTLs [REDACTED] [REDACTED]

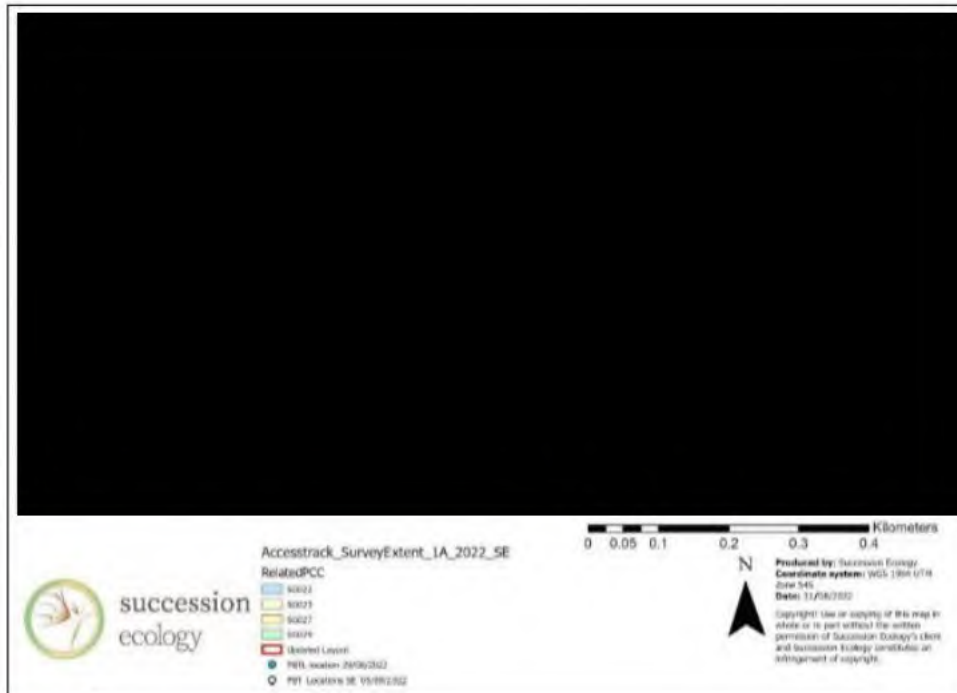


Figure 1. [REDACTED] by Succession Ecology on 5/09/2022.

Figure 66. Incident report (page 29 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

3.2 Additional PBTL Surveys

After NEOEN received the Memo from Succession Ecology, EBS Ecology was engaged to undertake further PBTL surveys to assist with informing a re-design of the [REDACTED] in the area. EBS Ecology undertook an additional survey for PBTL on the 11th of October 2022 (draft report Appendix 2). A total of [REDACTED] additional PBTLs were located in the vicinity of the [REDACTED]. Based on the results of the survey undertaken, the population of PBTL extended to the [REDACTED] away from the proposed [REDACTED] location as per Figure 2.

3.3 Habitat Classification

Based on the new PBTL records, the habitat classification was updated for the area and deemed to be Likely PBTL habitat as per the PBTL MP. The new records and change in habitat classification resulted in a review of the design of the [REDACTED].

3.4 Micro-siting Options

EBS Ecology worked with NEOEN and GEE to redesign the section of [REDACTED]. The aim was to minimise impacts to the PBTL habitat and individuals within this area. Several options were reviewed with an option to move the [REDACTED] to the [REDACTED] of the old design not considered a viable alternative due to the [REDACTED]. Therefore, the option to move the [REDACTED] to the [REDACTED] of the old design was investigated. The new design (Figure 2) reduced the impact to PBTL habitat and the number of individuals that would require relocation. The new design was also located along the [REDACTED] in the area ([REDACTED]) and therefore meant that the sub-population was not divided into two separate areas by the [REDACTED]. The new design was considered to be the design with the least impact possible to PBTL and PBTL habitat.

Figure 67. Incident report (page 30 of 43).



Figure 2. Updated PBTL habitat mapping and PBTL records [REDACTED] showing the extent of the new (light orange) and old (dark blue) designs.



Figure 68. Incident report (page 31 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

3.5 PBTL Relocation

EBS Ecology was requested to undertake a Pre-Clearance Check of the new design and relocate any PBTL prior to the 13th of December 2022 when construction was to commence (Appendix 3). Surveyors pegged the new design on the 4th of December 2022 with EBS Ecology undertaking the Pre-Clearance Check on the 6th of December 2022. Two individual PBTLs were located within the proposed clearance area for the new design and were subsequently relocated outside of the construction footprint. A PCC report was issued by EBS Ecology on the 8th December 2022 detailing the findings of the Pre-Clearance Checks (refer to Appendix 3).

3.6 Recovery Team Notification

As per the PBTL MP requirements, the PBTL Recovery Team was informed of the additional population of PBTLs at the Goyder South Project Site on the 2nd of September 2022 at a PBTL Recovery Team meeting. Dr Travis How (EBS Ecology) provided an overview of the Goyder South Project, previous findings and the updated records / locations of PBTLs. Discussions were held in relation to management options, the approach to PBTL relocations and the approach to PBTL translocations.



Figure 69. Incident report (page 32 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

4 PBTL HABITAT CLEARANCE INCIDENT

4.1 Summary of incident

GEE reported an incident, on the 16th of December 2022, where a machine operator had cleared the old [REDACTED] design and not the new updated design. The details of the incident are reported by GEE in their Incident Investigation Form INC-007 (20221223 - GLC GSWF Incident Investigation Report - Clearing at [REDACTED]).

EBS Ecology staff (Dr Travis How and Emma Tremain) undertook a site inspection on the 21st of December 2022 of the impacted area. Photographs of the impact area are provided in Figure 3 to Figure 5. The clearance area was inspected to determine whether any dead or injured PBTL were visible within the area. No PBTL were found within the subject area. The cleared area was assessed with approximately 30 spider holes were found and surveyed using the burrowscope. The holes had been impacted (top sections removed as a result of topsoil clearance). No PBTL were found in any of the holes. Several holes contained spiders or centipedes, while others were significantly obstructed with soil debris or empty.

It is estimated that up to at least 100mm of topsoil had been removed, with the material windrowed along the northern edge of the clearance area. The cleared area was approximately 75m long and between 20 and 30m wide (varies based on the design).

The new design was correctly pegged with pegs on both sides of the alignment at approximately 20m spacings. The old design had not been pegged by surveyors. No exclusion flagging or No-Go signage was installed along the new design or the old design. The site inspection was restricted to the area of PBTL habitat impacted. The other sections of clearance associated with the previous [REDACTED] design were not inspected as this was outside of the PBTL habitat area.

4.2 Potential Impact to PBTL

The total area of PBTL habitat impacted was approximately 0.21ha, with 12 individual PBTLs previously recorded within that area (based on Succession Ecology and EBS Ecology records from September to December 2022) (Figure 6). PBTL can move around in Spring / Summer, so it is unclear how many of the 12 previously recorded PBTLs were present at the time of the clearing.

The new design for the [REDACTED] would have impacted on a total of 0.05ha of PBTL habitat and two PBTL were relocated out of the area in preparation for the clearance activities (Figure 6). As all PBTL, known to occur in the proposed construction footprint of the new design, had been relocated (as per requirements), no known PBTL would have been directly impacted if the new design had been implemented for the construction of the [REDACTED]. In addition, the new design did not divide the population of PBTL into two which has now occurred as a result of the clearance along the old alignment (i.e. as shown in Figure 6).



Figure 70. Incident report (page 33 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation



Figure 3. General photo looking [REDACTED] showing alignment that was cleared.



Figure 4. General photo looking [REDACTED] of the cleared area towards [REDACTED].

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Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation



Figure 5. General photo looking north east from the northern edge of the cleared area towards SG023.

Figure 72. Incident report (page 35 of 43).



Figure 73. Incident report (page 36 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

5 REVIEW OF PROCESS AND MANAGEMENT

The incident has been reviewed against the requirements of the approved management actions, procedures and approval conditions as detailed in:

- GSWF-ELECNOR-EHS-PLN-0005-Rev 13-Construction Environmental Management Plan
- GSWF -ELECNOR-MAN-PLN-0005-Rev 3-Flora & Fauna Management Plan (FF MP)
- Goyder South Project PBTL Management Plan (PBTL MP)
- Goyder South Hybrid Renewable Energy Facility – Wind Farm 1A – EPBC 2021/8958 – Approval Documentation

GEE have also investigated the incident from their perspective and provided a comprehensive report that details their findings (20221223 - GLC GSWF Incident Investigation Report - Clearing at [REDACTED]). The contributing factors identified were:

- Human error occurred as a result of plant operator's reliance on GPS unit which had both the old and new design showing on it. Operator did not follow the on-site pegging or refer to the supplied PCC.
- Failure in the technology being used within the plant as the old design was not replaced with the new design, rather both designs were shown on the GPS unit.
- Visibility of the pegged alignment was poor due to vegetation growth
- No visual barrier (no-Go Zones or flagging) was implemented within PBTL habitat area

Based on a review of the requirements (detailed in the PBTL MP and FF MP) for undertaking works within PBTL habitat areas, the majority of required management actions were implemented. except the installation of visual barriers (No-Go Zones). A site induction for relevant staff was undertaken, however, it is considered that there is an opportunity to improve the delivery of information to construction staff in relation to control and management actions required in sensitive areas.

As soon as PBTLs were identified within the construction footprint (5th of Sept 2022), a redesign of the section of proposed [REDACTED] was undertaken to microsite infrastructure and minimise the likely impact on PBTL habitat. An updated design was provided by GEE which reduced the area of habitat clearance (reduced it from 0.21ha to 0.05ha), reduced the number of individuals likely to be impacted from [REDACTED] to 2 and went around the edge of the habitat so that the habitat was not divided into two. The new design was considered to be an excellent outcome.

Prior to the clearance activities commencing, the clearance corridor was pegged by a surveyor. A Pre-Clearance Check was then undertaken by EBS Ecology, with two PBTL identified within the proposed clearance corridor of the new design. Both lizards were then relocated outside of the proposed construction footprint. A PCC report was prepared and submitted to the relevant GEE staff on the 8th of December 2022. The subsequent incident then occurred on the 16th of December 2022.



Figure 74. Incident report (page 37 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

The incident investigation processes detailed in the CEMP and FF MP have been followed by GEE. As per the provided GEE Incident Report, the incident was reported by the plant operator to their supervisor as soon as they were aware of the issue on the 16th of December (same day as the clearance activities occurred). GEE then notified Neoen on the same day of the incident. All clearing works were ceased until the incident was investigated, a report prepared and corrective actions identified and implemented.

The review undertaken by EBS Ecology has identified one key action that was not implemented as per the requirements of the approved Management Plans. This was the flagging of item boundary as exclusion zone. In addition, it is considered that the site induction / toolbox meetings can be improved to further highlight the controls and management actions required whilst working in sensitive areas.



Figure 75. Incident report (page 38 of 43).

6 SUMMARY AND RECOMMENDED ACTIONS

It is considered that the old design should now be utilised for the [REDACTED] as the impact has occurred. As the entire cleared area will now be used, the on-ground remedial actions that can be implemented are limited.

The extent of PBTL habitat clearance will need to be incorporated into the PBTL Offset Management Plan to ensure any residual impacts to PBTL are appropriately offset. Clearance of PBTL habitat found post approval will need to be quantified, with offsets calculated and incorporated into the PBTL Offset Management Plan.

It is recommended that at least two culverts are installed across the section of Access Track within PBTL habitat to provide a connection (passageway) between the two habitat areas. The fauna passageways should be at least a 300mm diameter pipe. Shelter items will need to be placed within the culverts to provide refuges for PBTL that utilise the fauna passageways. This hasn't been undertaken for PBTL previously and therefore can be used as an opportunity to determine their effectiveness for the species.

GEE have developed a number of corrective actions that will be implemented as a result of the incident (refer to GEE Incident Report for details). These have been reviewed by EBS Ecology and are considered sufficient to prevent a similar incident occurring again.

It is considered that no additional or new management actions (above the corrective actions that GEE will implement) are required as a result of this unplanned PBTL habitat clearance incident. It is considered that providing the proposed corrective actions, together with the management actions identified in the relevant management plans are implemented, then future incidents will be avoided.

Figure 76. Incident report (page 39 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

APPENDIX 1 – SUCCESSION ECOLOGY MEMO



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Figure 77. Incident report (page 40 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

APPENDIX 2 – EBS ECOLOGY MEMO



Figure 78. Incident report (page 41 of 43).

Goyder South Hybrid Renewable Energy Facility Wind Farm Stage 1A - [REDACTED] Incident Investigation

APPENDIX 3 – EBS ECOLOGY PCC



Figure 79. Incident report (page 42 of 43).



Figure 80. Incident report (page 43 of 43).



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