EPBC 2024/09929 Goyder North Wind Farm

Construction Environmental Management Plan

Draft

October 2025

NEOEN

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Draft

Prepared by
Umwelt (Australia) Pty Limited

On behalf of
Neoen (Australia) Pty Ltd

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Report No.:	31669/RO15
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This report was prepared using Umwelt's ISO 9001 certified Quality Management System.

EPBC Reference Details

EPBC number	2024/09929
Project name	Goyder North Wind Farm
Proponent / approval holder and CAN or ABN	**TBC**
Proposed / approved action	99 wind turbine generators and associated infrastructure
Location of the action	**TBC**
Person accepting responsibility for the environmental management plan – signed declaration	**TBC**

Declaration of Accuracy

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (Commonwealth; Cth) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. 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 declaration.

Signed _____

Full name _____

Organisation Neoen (Australia) Pty Ltd_____

Date 3/10/2025

Acknowledgement of Country

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Document Status

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Version Control

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V0.1	E. Tremain	2/05/2025	NA (First draft)	G. Schinkel, H. Pocock (Neoen)

Version Number	Responsible Person	Date	Reason for Change	Reviewed By
V0.2	J. Skewes	4/09/2025	Respond to comments from Neoen and update document.	Umwelt
V1	J. Skewes	4/09/2025	Issue of draft CEMP with Preliminary Documentation	Umwelt

Abbreviations

Abbreviation	Description
%	Percent
<	Less than
>	More than
≤	Less than or equal to
≥	More than or equal to
AAR	Aboriginal Affairs and Reconciliation
BAM	Bushland Assessment Methodology
BCM	Bushland Condition Monitoring
BDBSA	Biological Database of South Australia (managed by DEW)
BESS	Battery Energy Storage System
cm	Centimetre(s)
CP	Conservation Park
Cth	Commonwealth
DA	Development Approval
dB(A)	A-weighted decibels (a measurement scale used to assess sound that reflects human ear sensitivity to different frequencies)
DF	Disturbance Footprint
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Commonwealth)
DEMP	Decommissioning Environmental Management Plan
DEW	Department for Environment and Water (South Australia)
DNF	Decision Notification Form
EBS	Environment and Biodiversity Services Pty Ltd – trading as EBS Ecology (now Umwelt)
EDMS	Electronic Document Management System
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth)
EMS	Environmental Management System
EPA	Environment Protection Authority (South Australia)
EPA Act	*Environment Protection Act 1993* (South Australia)
EPC	Engineering, Procurement and Construction (contractor)
FLB	Flinders Lofty Block IBRA Bioregion
FPRMMR#2	First Peoples of the River Muray Mallee Region
GNWF	Goyder North Wind Farm
GNREF	Goyder North Renewable Energy Facility
GRC	Goyder Regional Council
GRZ	Goyder Renewables Zone
HA	Heritage Agreement
ha	hectare(s)

Abbreviation	Description
HSE	Health Safety and Environment
IBRA	Interim Biogeographical Regionalisation of Australia
INTG	Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community
kV	Kilovolt (s)
LGA	Local Government Area
LSA Act	*Landscape South Australia Act 2019* (South Australia)
m2	Square metres / metres squared
MDD	Murray Darling Depression IBRA Bioregion
MNES	Matter(s) of National Environmental Significance
MW	Megawatts
MWh	Megawatt hour
NA	Not applicable / not available
Neoen	Neoen Australia Pty Ltd
NNAC	Ngadjuri Nation Aboriginal Corporation
NPW Act	*National Parks and Wildlife Act 1972* (South Australia)
NV Act	*Native Vegetation Act 1991* (South Australia)
NVC	Native Vegetation Council
OTL	Overhead Transmission Line (primary)
O&M	Operations and Maintenance
PBTL	Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis*)
Pers. comms.	Personal communications
PMST	Protected Matters Search Tool
SA	South Australia(n)
SCAP	State Commission Assessment Panel
SEB	Significant Environmental Benefit
sp.	Species (singular)
spp.	Species (plural)
ssp.	Subspecies
SWMS	Safe Work Method Statement(s)
TEC	Threatened Ecological Community
Umwelt	Umwelt (Australia) Pty Ltd
VA	Vegetation Association (s)
Var	Variety (a taxonomic rank below that of species and subspecies, but above that of form)
WF	Wind Farm – generation components of GN1.
WHS	Work Health and Safety
WTG	Wind Turbine Generator

Glossary

Abbreviation	Description
Project	The Goyder North Wind Farm (GNWF) Project (or the Goyder North Renewable Energy Facility Stage 1 Project as it is referred to for the purposes of the EPBC Approval) represents the Action seeking approval. The Project comprises of up to 99 wind generating turbines (WTGs), a Battery Energy Storage System (BESS) of around 225/900 MWh, a 48 km of overhead transmission line (OTL) connecting in at Bundey Substation, expansion of Bundey Substation, a collector substation, access tracks and underground cabling at the wind farm, meteorological masts for ongoing wind collection data, operation and maintenance compounds, and construction compounds.
Declared weed	A plant that is regulated under the LSA Act due to its threat to primary industry, the natural environment and / or public safety.
Development Envelope (DE)	A 'buffered' version of the indicative Project layout that represents the maximum spatial extent in which the Disturbance Footprint will occur within Despite the design being well developed and optimised to minimise cut and fill, avoid known areas of significance or value, and to minimise the Disturbance Footprint, the Development Envelope is an extra measure to enable final adjustments to the Disturbance Footprint in alignment with the Mitigation Hierarchy to avoid or minimise impacts on environmental values, cultural heritage or any other potential constraints that emerge during design finalisation and construction. The DE is enclosed within the Project Area and includes areas required for temporary and permanent project infrastructure, equipment and materials laydown, installation, and access.
Disturbance Footprint (DF)	The area in which all Project infrastructure (including, but not limited to, access tracks, WTGs, hardstands, and electrical reticulation) is constructed and operated. Note that some areas within the Disturbance Footprint which are impacted during construction will be rehabilitated post construction (temporary disturbance) however this will not result in any deduction on Neoen's offset commitments under the *Native Vegetation Act 1991* or the *Environment Protection and Biodiversity Conservation Act 1999*.
Met mast	Meteorological mast (mast or tower equipped with instruments to measure windspeed and climatic conditions)
Minister	The Australian Government Minister administering the EPBC Act including any delegate thereof
NatureMaps	Initiative of DEW that provides a common access point to maps and geographic information about South Australia's natural resources in an interactive online mapping format.
Operation	All activities that occur after the components of the final wind turbine generator are installed and the usage of the transmission line and substation for the purposes of transforming and/or redistributing electric current.
Project Area	All GNWF Project components including the WF and OTL.
Search Area	5 km buffer of the GNREF boundary applied to all database searches and desktop component of study.

Executive Summary

Neoen is developing the Goyder North Wind Farm (GNWF) as a part of its wider Goyder Renewables Zone (GRZ), which is ideally located to complement Project EnergyConnect, a large interconnector transmission line which connects the South Australian (SA) transmission network to New South Wales (NSW), currently under construction by ElectraNet and TransGrid.

The GNWF comprises approximately 17,700 hectares (ha) of land located approximately 5.5 km north-east of Burra and 4 km east of the Mount Bryan township in the Goyder Regional Council area, approximately 150 km north of Adelaide, in SA. The Project received planning consent under the name Goyder North Renewable Energy Facility (GNREF) by the Government of South Australia in October 2024 under the *Planning, Development and Infrastructure Act 2016* (PDI Act), which included a project area of approximately 21,500 ha. Since the GNREF received state planning consent, the Project as discussed herein has since been redesigned and refined over time to accommodate both economic, socioeconomic and ecological considerations. As such, while the Project has received state approval under the name GNREF, the Project herein refers solely to the GNWF proposed to be developed within a smaller project area, with up to 99 Wind Turbine Generators (WTGs), and one Overhead Transmission Line (OTL) which will connect the Wind Farm to the Bundey Substation near Bundey. The GNWF will accommodate approximately 600 MW of wind generation and up to 225 MW / 900 megawatt hours (MWh) within the BESS, and is inclusive of infrastructure required for wind generation, transmission and connection to the energy grid and the BESS.

This Construction Environmental Management Plan (CEMP) has been prepared by Umwelt (Australia) Pty Ltd (Umwelt) on behalf of Neoen. This CEMP applies to construction activities carried out for GNWF and has been prepared:

- As part of the Preliminary Documentation assessment process carried out under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (referral 2024/09929).
- As part of Neoen's commitments under the Native Vegetation Clearance Application (and likely in response to conditions associated with the Native Vegetation Clearance Approval, not yet finalised).
- In response to the Decision Notification Conditions associated with the Planning Consent issued by the South Australian State Commission Assessment Panel, dated 28 October 2024.
- In accordance with the South Australian Environment Protection Authority (EPA) CEMP guidelines (Environment Protection Authority, 2024).
- In accordance with the Department of Climate Change, Energy, the Environment and Water *Environmental Management Plan Guidelines* (DCCEEW, 2024).

This CEMP and associated sub plans describe the environmental management and impact avoidance, minimisation and mitigation measures that will be implemented during the construction phase of GNWF. This CEMP provides a framework for the protocols, responsibilities and actions associated with environmental management which Neoen and their contractors are required to adhere to.

Impact avoidance, minimisation, management and mitigation measures described in this CEMP and associated sub plans are the minimum required to meet the requirements of Neoen's Environmental Management policy as well as state and federal approvals, conditions and commitments.

In accordance with these conditions, several sub plans are being prepared, to be finalised in agreement with the construction contractor, that must be read in conjunction with this CEMP.

The three primary objectives of this CEMP are as follows:

1. Avoid and minimise any adverse environmental impacts associated with construction activities.
2. Satisfy the requirements of Neoen/The Contractor's Environmental Management policy.
3. Satisfy regulatory requirements and approval conditions.

To fulfill these objectives for the GNWF, the CEMP will:

- Ensure that all personnel responsible for the construction of GNWF (including Neoen, all contractors and sub-contractors) are aware of their environmental responsibilities.
- Ensure that relevant information is documented and communicated within and between Neoen and all contractors and sub-contractors.
- Ensure that environmental monitoring, reporting and review occurs to manage environmental components of the construction and allows for adaptive management and continual improvement of this CEMP.
- Ensure that ongoing and effective communication occurs with DCCEEW, the SA Department for Environment and Water (DEW), Goyder Regional Council (GRC) and other authorities, as required by legislation.
- Ensure that responses to incidents that may cause environmental harm are appropriate and timely.

The CEMP details:

- The existing environment within the GNWF Project Area.
- Construction activities and methodology which are likely to occur as part of the project.
- The environmental management framework which will used to implement the CEMP.
- Regulatory requirements and conditions, as outlined in approvals (to be updated once approvals are obtained).
- Construction management measures for all identified environmental aspects, which includes targets for achieving the desired outcomes and triggers to identify when targets have not been met and corrective action and review may be required.
- A summary of monitoring, auditing and reporting which is likely to be required during construction of the wind farm.

This CEMP has been drafted to accompany Preliminary Documentation request for information, related to the EPBC Referral process (EPBC2024/09929) and prior to selection of the Construction Contractor. Thus, conditions of approval and Construction Contractor specific information is not presented in this draft document. The document will be updated once all approvals have been obtained, and the Construction Contractor has been selected.

Furthermore, this CEMP will be regularly reviewed and updated as required to ensure that the environmental objectives are being achieved. Any changes to the CEMP as a result of the review process will require written approval of the Minister. The varied activity should not commence until the Minister has approved the varied management plan in writing.

Contents

Figures

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Appendices

1.0 Project Description

1.1 Overview of the Goyder North Renewable Energy Facility

Neoen is developing the Goyder North Renewable Energy Facility (GNREF) as a part of its wider Goyder Renewables Zone (GRZ) concept (**Figure 1.1**). As a part of this concept, the Goyder South Hybrid Renewable Energy Project was granted Development Approval (DA) in 2021, and EPBC Approval in July 2022 (Stage 1A EPBC/2021/8958; Stage 1B EPBC/2021/8957), with construction of Stage 1 beginning in 2022, consisting of 412 Megawatts (MW) of wind turbine power generation. The GRZ is ideally located to complement Project EnergyConnect, a large interconnector transmission line which connects the SA transmission network to New South Wales (NSW), currently under construction by ElectraNet and TransGrid (pers. comms. Neoen 2024).

The proposed GNREF is located north-east of Burra and east of the Mount Bryan township in the Goyder Regional Council area, and, in its entirety will be distributed across approximately 20,000 hectares (ha) of predominantly agricultural land, utilised for cattle and sheep grazing and dryland cropping of grains.

GNWF has been refined to incorporate an area of approximately 17,731 ha in the southern two thirds of the GNREF Project Area and includes a Wind Farm (WF) which will be connected to the existing electricity network at Bundey Substation via an Overhead Transmission Line (OTL) of approximately 48 km.

Access to the Project Area is via two major highways, the Goyder and Barrier Highways, and several minor, unsealed, local roads including:

- White Hill Road and Belcunda Road providing access to the western and northern Project Area.
- World's End Highway, Powerline Road, Eagle Hawk Gate Road and Bundey Church Road providing access the OTL.

GNWF is comprised of:

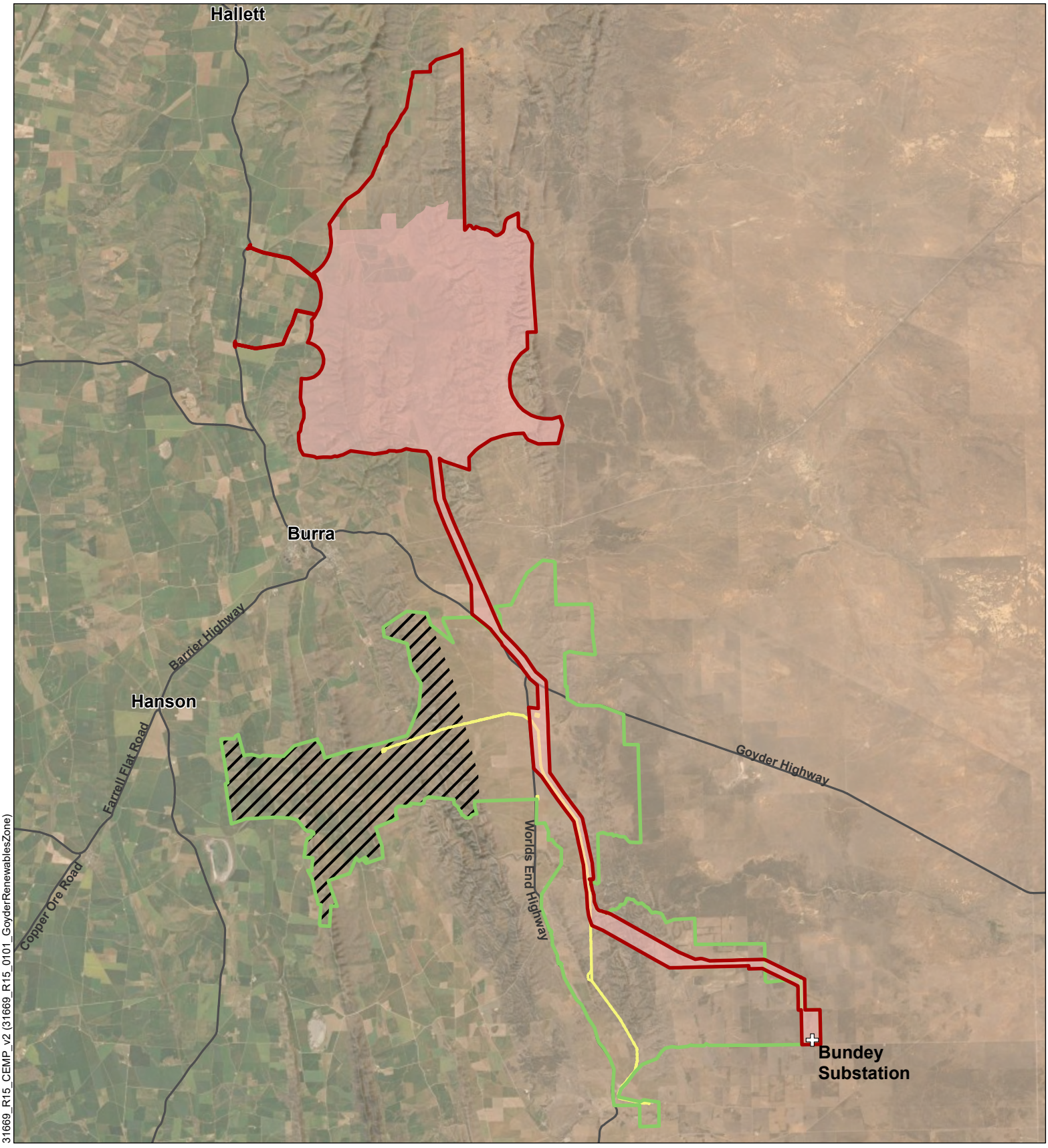
- Up to 99 Wind Turbine Generators (WTGs) with a capacity of approximately 600 MW, a maximum hub height of 160 m, a maximum blade length of 95 m, and an overall maximum height of 240 m.
- Associated infrastructure for connection to the electricity grid including underground cables, substations (two fenced compounds at the wind farm) and the other as an extension of the existing Bundey Substation) and ~48 km of OTL between the wind farm at the Bundey Substation.
- Approval for one Battery Energy Storage System (BESS) in the main wind farm (WF) area.
- Access tracks (permanent and additional temporary tracks for construction access).
- Temporary and permanent laydown areas, temporary concrete batching plant facilities, temporary construction compounds and site offices as well as permanent operations and maintenance facilities.

This Plan relates to the area currently under development, hereafter referred to as Goyder North Wind Farm (GNWF), the Project or the Project Area. Any subsequent future stages, if developed, will utilise a separate Management Plan if applicable. An overview of GNWF along with the corresponding *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval sought and obtained is outlined in **Table 1.1.**

Table 1.1 GNWF EPBC Approval Details for GNWF

Proposed Action	Legal Entity	EPBC Referral Reference	EPBC Referral Decision	Date EPBC Approval Achieved
GNWF (99 WTGs and associated infrastructure)	To be advised	EPBC2024/09929	Controlled Action	To be advised

Figure 1.1 Goyder Renewables Zone



GRZ Overview

- GNREF
- GNWF
- GS
- GSS1
- GS OTL
- Bundey Substation (existing)

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 2/09/2025 9:30 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 2.5 5 km

31669_R15_CEMP_v2 (31669_R15_0101_GoyderRenewablesZone)

1.2 Staging of the Goyder North Wind Farm Project

Given the scale of wind energy generation that would be achieved by the development of the GNWF, it is possible to be developed in two stages with each stage potentially having its own legal entity, construction contracts and financing packages. The exact size and timing of stages will be defined through the development process and will be informed by the size and timing of Power Purchase Agreements dictated by customer electricity demand as well as the construction contractor's capability and tendering negotiations. Goyder North Wind Farm (under application in this report) Farm will likely comprise:

- Stage 1: Approximately 48 WTGs proposed to commence from Q1 2026.
- Stage 2: The remaining WTGs (constituting a total of up to 99) to be constructed in the 2–5-year timeframe.

An additional 400 MW or up to 36 WTGs were proposed in the broader Development Application (DA) approved in 2024. The design has been refined since and there is no current plan to develop any future stages. If any further stages were to be progressed in the future, they would be subject to their own approval processes and stakeholder engagement.

1.2.1 Project Terminology and Definitions

There are several project specific terminology and abbreviations which are referred to repeatedly throughout this Plan. Project boundary components are described below in **Table 1.2.** The Action and types of disturbance referred to in this Plan are described in **Table 1.3** and **Table 1.4.**

Table 1.2 Project Specific Terminology

Term	Abbreviation	Description
Goyder North Renewable Energy Facility	GNREF	The broader area which bounds the direct wind farm infrastructure of access roads and wind turbine generators (WTGs), which includes the entire footprint for which Planning Approval was obtained in 2024, including GNWF as well as the Overhead Transmission Line that connects into the existing Bundey Substation, and expansion of the Bundey Substation.
Goyder North Wind Farm	GNWF	The portion of the GNREF which is proposed to commence construction within the next five years and is the focus of this assessment. Includes all wind generation infrastructure (generating up to 600 MW) and associated infrastructure, including access roads, underground cables, substations, overhead transmission lines (OTL), construction and operation compounds and met masts, required to transmit and connect into existing Bundey Substation.
Disturbance Footprint	DF	The total initial clearance area required for safe and efficient construction of the proposed GNWF Project, including both permanent and temporary clearance for construction buffers, laydown areas, stockpile areas and construction access routes for the Wind Farm Generation Components and the OTL.

Term	Abbreviation	Description
Development Envelope	DE	Project layout that represents the maximum spatial extent in which the Disturbance Footprint will occur within. It is enclosed within GNWF and includes areas required for temporary and permanent project infrastructure, equipment and materials laydown, installation, and access. The Development Envelope allows flexibility in final positioning of the project infrastructure to occur once the Project has undergone detailed design and further ecological and cultural heritage surveys, and the contract has been awarded for supply and construction. This optimises the final siting of infrastructure to allow for further avoidance and management of specific on-ground constraints that are identified in future technical assessments or during construction including both environmental and cultural heritage.

Table 1.3 Impact Definitions in Relation to the Project

Disturbance Type	Definition
The Action	The Action includes both construction and operation of the proposed Project, and any change from existing activities which are required to undertake these tasks safely and effectively. Both direct and indirect impacts of the Action are considered in the assessment of potential impacts presented in this report.
Permanent Disturbance	The areas within the GNWF DF (up to 281.62 ha native and non-native vegetation, excluding roads and existing infrastructure) which will not be rehabilitated following construction. These areas are required to locate the infrastructure, and to provide safe and efficient access throughout the life of the asset, including for the operation and maintenance of the WTGs, transmission infrastructure and BESS for all Project elements. These areas will require either land acquisition and/or an easement agreement with landowners and will likely result in changes to existing land use.
Temporary Disturbance	The areas within the GNWF DF (up to 230.52 ha native and non-native vegetation, excluding roads and existing infrastructure) which will be cleared during construction to enable access of heavy machinery and construction related activities but rehabilitated following construction where it is reasonable and practical to do so. The Temporary Disturbance areas will be rehabilitated following construction, with the objective of returning the area (where practicable) to native vegetation cover of similar composition, to the pre-disturbance vegetation associations present.

Table 1.4 Types of Impact Associated with Permanent and Temporary Disturbance

Disturbance Type	Terminology	Definition
Permanent Disturbance	Direct Impact	Adverse impacts that occur as a result of the action either during construction or operation or both. Includes immediate observable effects of the Action such as clearance of vegetation, loss of individual flora or fauna species from construction or from operation of wind turbine generators or disruption of fauna behaviours (such as nesting) within the Disturbance Footprint because of noise and increased activity during construction.

Disturbance Type	Terminology	Definition
	Indirect Impact	Adverse impacts that could reasonably be predicted to follow from the action during construction and / or operation, whether these impacts are within the control of the proponent proposing to take that action or not. Indirect impacts may include encroachment of weeds into disturbed areas or change in water runoff / catchments.
Temporary Disturbance	Rehabilitated	Vegetation impacts which involve initial clearance followed by dedicated rehabilitation measures to return the cleared area to its previous state or better where practical and reasonable to do so. Rehabilitation actions are proposed to be undertaken within three years of the initial impact.

1.3 Purpose and Objectives of the CEMP

1.3.1 Purpose

This Construction Environmental Management Plan (CEMP) has been prepared by Umwelt (Australia) Pty Ltd (Umwelt) on behalf of Neoen. This CEMP applies to construction activities carried out for GNWF and has been prepared:

- In response to the Decision Notification Conditions associated with the Planning Consent issued by the South Australian State Commission Assessment Panel, dated 28 October 2024 (**Appendix A**).
- As part of the Preliminary Documentation assessment process carried out under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (referral 2024/09929) (**Appendix B**).
- As part of Neoen's commitments under the Native Vegetation Clearance Application (and likely in response to conditions associated with the Native Vegetation Clearance Approval, not yet finalised) (**Appendix C**).
- In accordance with the South Australian Environment Protection Authority (EPA) CEMP guidelines (Environment Protection Authority, 2024).
- In accordance with the Department of Climate Change, Energy, the Environment and Water *Environmental Management Plan Guidelines* (DCCEEW, 2024).

This CEMP and associated sub plans describe the environmental management and impact avoidance, minimisation and mitigation measures that will be implemented during the construction phase of GNWF. These have been prepared in response to the environmental studies and associated reports completed for GNWF (**Appendix D**). This CEMP provides a framework for the protocols, responsibilities and actions associated with environmental management which Neoen and their contractors are required to adhere to.

Impact avoidance, minimisation, management and mitigation measures described in this CEMP and associated sub plans are the minimum required to meet the requirements of Neoen's Environmental Management policy, Neoen's Development Approval for the Project (**Appendix A**), EPBC Act approval (**Appendix B**) and Native Vegetation Clearance Approval (**Appendix C**) conditions and commitments. In accordance with these conditions, several sub plans are being prepared, to be finalised in agreement with the construction contractor, that must be read in conjunction with this CEMP, which are described in **Section 12.0** and outlined in **Table 1.5.**

Table 1.5 Environmental Sub-plan Summary Including Division of Responsibility.

Sub-plan Type	Responsibility
Dust (Air Quality) Management Plan	EPC Contractor
Decommissioning Environmental Management Plan	Neoen
Fire and Emergency Response Plan	EPC Contractor
Flora and Fauna Management Plan	EPC Contractor
Iron-grass Natural Temperate Grassland Threatened Ecological Community Management Plan	Neoen
Noise and Vibration Management Plan	EPC Contractor
Operational Environmental Management Plan (OEMP)	Neoen
Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis*) Management Plan	Neoen
Rehabilitation Management Plan	EPC Contractor
Soil Erosion and Drainage Management Plan	EPC Contractor
Stormwater Management Plan	Neoen
Waste Management Plan	EPC Contractor
Wombat Management Plan	Neoen

This CEMP has been prepared to cover actions that will occur during the construction phases of GNWF (including wind farm, substation and OTL).

This CEMP is not intended to cover actions that will occur during the operational phase of GNWF. An Operation Environmental Management Plan (OEMP) will be developed prior to operation commencing.

1.3.2 Objectives

The three primary objectives of this CEMP are as follows:

1. Avoid and minimise any adverse environmental impacts associated with construction activities.
2. Satisfy the requirements of Neoen/The Contractor's Environmental Management policy (**Appendix E**, and **Appendix F**, to be attached when contractor selected)
3. Satisfy regulatory requirements and approval conditions.

To fulfill these objectives for the GNWF, the CEMP will:

- Ensure that all personnel responsible for the construction of GNWF (including Neoen, all contractors and sub-contractors) are aware of their environmental responsibilities.
- Ensure that relevant information is documented and communicated within and between Neoen and all contractors and sub-contractors.
- Ensure that environmental monitoring, reporting and review occurs to manage environmental components of the construction and allows for adaptive management and continual improvement of this CEMP.
- Ensure that ongoing and effective communication occurs with DCCEEW, the SA Department for Environment and Water (DEW), Goyder Regional Council (GRC) and other authorities, as required by legislation.
- Ensure that responses to incidents that may cause environmental harm are appropriate and timely.

2.0 Existing Environment

2.1 Landscape Context

The GNWF Project Area is located north-east of Burra and east of the Mount Bryan township in the Goyder Regional Council area. The OTL traverses 48 km south from the Wind Farm to the existing ElectraNet substation at Bundey. In its entirety, GNWF will be distributed across approximately 17,300 hectares (ha) of predominantly native vegetation utilised for agricultural grazing of sheep, and cattle, with minor areas of dryland cropping of grains.

2.1.1 Natural Environment

The GNWF Project Area is dominated by ridges, plains and undulating hills, which are deeply dissected by eroded drainage gullies. The general region contains open, low hills with occasional rocky outcrops that fall away to low foot slopes and drainage channels at regular intervals.

Several minor watercourses intersect the GNWF, listed in **Table 2.1.**

Table 2.1 Watercourses Within Each Component of the Project

Project Element	Watercourses	Wetlands
WF	Newikie Creek, North Wiry Creek, South Wiry Creek, Wandalla Creek, Baldina Creek	NA
OTL	Wandalla Creek, Baldina Creek, Stone Chimney Creek, Burra Creek	NA

Four Protected areas adjoin GNWF, for which exclusion buffers have been / will be applied. The relevant protected areas include:

- Mokota Conservation Park (CP) which occurs on the northwestern corner of the WF. It is bounded to the north by White Hill Road, and an additional main windfarm access road is proposed along its southern boundary. A turbine setback of 450 m is applied around this conservation park.
- Mimbara CP, which adjoins directly east of the OTL and occurs within the Development Envelope. No specific setbacks are associated with this CP; however, no works are to occur within its boundary.
- One Heritage Agreement (HA) adjoins the northeastern boundary of the Project Area (HA1264). No specific setbacks are associated with this HA; however, no works are to occur within its boundary, and it does not occur within the Development Envelope.
- A private conservation reserve, Tiliqua Nature Reserve, occurs within the south-central area of the WF. A turbine setback of 500 m is applied around Tiliqua Nature Reserve.

2.1.2 Built Environment

Nearby settlements and their distance from the Project Area include:

- Mount Bryan, 4.10 km to the west of the eastern boundary. The main site access is proposed 2.47 km south of Mount Bryan township.

- Burra, 5.47 km south of the southern WF boundary (3.79 km from town outer limits).
- Hallet, 12.70 km to the north-west of the eastern boundary.
- Robertstown,14.66 km to the southwest of the southern extent of the OTL / Bundey Substation.

There are 3 residential dwellings located within the Project Boundaries. The number of dwellings within 3.5 km of the closest turbine are listed below:

- 6 non-participating residences within 3.5 km of the closest turbine
- 10 residences located within 3.5 km of the closest turbine.

2.1.3 Identified Sensitive Receivers

A sensitive receiver is defined in (EPA, 2016) to be: any fixed location (including a house, building, other premises or open area) where:

- human health may be affected by air emissions from existing or proposed development, and/or
- property damage or loss of amenity may be caused by air emissions from the existing or proposed development, and/or
- noise-affected premises (whether existing or future, based on land use zoning) that are in separate occupation from the existing or proposed noise source and used for residential or business purposes or constitute a quiet ambient environment set aside for public recreation and enjoyment, and/or
- plants, animals or ecosystems that may be affected by air and/or noise emissions.

Plants, animals and ecosystems that may be affected by air and/or noise emissions and/or impacted by construction of the GNWF are identified and described in the following section. WTGs will be set back from non-involved dwellings by approximately 2 km, and involved dwelling setbacks are negotiated with each landholder, ensuring compliance with the EPA's noise guidelines.

2.2 Ecology

2.2.1 Native Vegetation

Native vegetation throughout the Project Area is comprised predominantly of grasslands, with large tracts of Iron-grass (*Lomandra* spp.) in the middle and eastern sections (**Figure 9.1** and **Figure 9.2**). Remnant mallee woodland associations occur along the eastern side of the site, where they grade into chenopod dominated plains. The OTL route traverses a variety of landscapes, and includes *Austrostipa* Grassland, *Lomandra* Grassland, Chenopod Shrubland, and Mallee Woodland. All native vegetation is to some extent modified by a long history of agriculture. Non-native vegetation includes areas of dryland cropping, amenity planted vegetation, residential dwellings and existing infrastructure such as roads and highways.

A total of 23 native vegetation associations have been mapped across the Project Area, of which 21 are being impacted in the Disturbance Footprint. Up to 267 species of native plant have been identified (not all to species level) in the Project Area.

All native flora is protected under the *National Parks and Wildlife Act 1972* (NPW Act) in South Australia. Approval under the *Native Vegetation Act 1991* (NV Act) is required to clear native vegetation in South Australia.

Two nationally listed threatened flora species, protected under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) have been identified in the Project Area:

- *Dodonaea procumbens* (Trailing Hop-bush) (EPBC Act: Vulnerable, NPW Act: Vulnerable), occurring within the Development Envelope surrounding the Gum Hill Road access, within Mokota Conservation Park (**Figure 9.6**).
- *Acacia spilleriana* (Spiller's Wattle) (EPBC Act: Endangered, NPW Act: Endangered), occurring as planted specimens along Gum Hill Road (peripheral site access), west of Koolinda Road (**Figure 9.5**).

Two nationally Threatened Ecological Communities (TEC) occur within the Project Area, Development Envelope and Disturbance Footprint:

- Iron-grass Natural Temperate Grassland (INTG) of South Australia (EPBC Act: Critically Endangered).
- Mallee Bird Community (MBC) of the Murray Darling Depression Bioregion (EPBC Act: Vulnerable).

Five nationally listed flora species have been identified as possibly occurring within the Project Area, however, at the time of writing, these have not been detected within the Project Area despite extensive surveys. They include:

- *Acacia glandulicarpa* (Hairy-pod Wattle) (EPBC Act Vulnerable, NPW Act Endangered).
- *Codonocarpus pyramidalis* (Slender Bell-fruit) (EPBC Act: Vulnerable; NPW Act: Endangered).
- *Dodonaea subglandulifera* (Peep Hill Hop-bush) (EPBC Act Endangered, NPW Act Endangered).
- *Olearia pannosa* ssp. *pannosa* (Silver Daisy-bush) (EPBC Act Vulnerable, NPW Act Vulnerable).
- *Senecio megaglossus* (Superb Groundsel) (EPBC Act Vulnerable, NPW Act Endangered).

Specific management actions are incorporated as part of this CEMP to address potential impacts to native flora, vegetation communities and Matters of National Environmental Significance (MNES).

Given the likelihood of impacts occurring to INTG TEC, a separate INTG TEC Management Plan (sub-plan) (INTG MP) will be developed for the Project prior to construction commencing, which provides specific detailed management actions required to avoid and minimise impact to this TEC.

2.2.2 Non-native Vegetation

Up to 106 weed species have been recorded in the Project Area including fourteen weeds listed as Declared under the *Landscape South Australia Act 2019* (LSA Act), three of which are also listed as Weeds of National Significance (WoNS) (**Table 2.2**).

Weeds have not been mapped in detail across the Project Area. Specific management actions are incorporated into this CEMP to address the current knowledge gap and to manage potential impacts caused by the presence of Declared weeds.

Table 2.2 Declared Weeds in the Project Area

Scientific Name	Common Name	LSA Act Weed Status	WoNS
Chondrilla juncea	Skeleton Weed	Declared	No
Chrysanthemoides monilifera ssp. monilifera	Boneseed	Declared	Yes
Convolvulus arvensis	Field Bindweed	Declared	No
Echium plantagineum	Salvation Jane	Declared	Yes
Gazania linearis	Gazania	Declared	No
Lycium ferocissimum	African Boxthorn	Declared	Yes
Marrubium vulgare	Horehound	Declared	No
Moraea flaccida	One-leaf Cape Tulip	Declared	No
Olea europaeus	Olive	Declared	No
Reseda lutea	Cut-leaf Mignonette	Declared	No
Rosa canina	Dog Rose	Declared	No
Silybum marianum	Variegated Thistle	Declared	No
Tribulus terrestris	Caltrop	Declared	No
Xanthium spinosum	Bathurst Burr	Declared	No

2.2.3 Fauna

In total, 128 species of native fauna have been recorded within GNREF by Umwelt (formerly EBS Ecology) during field surveys (targeted and opportunistic) between September 2022 and March 2025. This includes 104 species of bird, four mammals, four frogs, 15 reptiles and one crustacean. Additionally, up to four species of bat have been detected, however their positive identification is pending specialist data analysis to confirm. A further 12 non-native fauna species have been detected on site, including four bird and eight mammal species. **Appendix D** details the ecological surveys, and other environmental studies undertaken within the Project Area and any associated reports.

All native fauna (and flora) is protected under the *National Parks and Wildlife Act 1972* (NPW Act) in South Australia. Additionally, under the NPW Act, Section 68AA prohibits the destruction, damage or disturbance of wombat burrows. Southern Hairy-nosed Wombats (*Lasiorhinus latifrons*) are known to occur in the Project Area. Specific permits may be required to disturb any wombat burrows in the Project Area during construction. A separate Wombat Management Plan will be developed for the Project Area prior to construction.

Five nationally listed threatened fauna species and one Migratory species, protected under the EPBC Act, have been detected in (or immediately surrounding) the Project Area:

- Southern Whiteface (*Aphelocephala leucopsis leucopsis*) (EPBC Act: Vulnerable).
- Flinders Ranges Worm-lizard (*Aprasia pseudopulchella*) (EPBC Act: Vulnerable).
- Fork-tailed Swift (*Apus pacificus*) (EPBC Act: Migratory).
- Hooded Robin (*Melanodryas cucullata cucullata*) (EPBC Act: Endangered, NPW Act: Rare).
- Diamond Firetail (*Stagonopleura guttata*) (EPBC Act: Vulnerable, NPW Act: Vulnerable).

- Pygmy Bluetongue Lizard (*Tiliqua adelaidensis*) (EPBC Act: Endangered, NPW Act: Endangered).

While not detected in or immediately adjacent to the Project Area, one additional EPBC listed threatened fauna species has been assessed as potentially occurring in the Project Area:

- Blue-winged Parrot (*Neophema chrysostoma*) (EPBC Act: Vulnerable, NPW Act: Vulnerable).

Specific management actions are incorporated into this CEMP to manage potential impacts to threatened native fauna in the Project Area.

Given the likelihood of impacts occurring, a separate Pygmy Blue-tongue Lizard Management Plan (sub-plan) (PBTL MP) will be developed for the Project Area prior to construction commencing, which provides specific detailed management actions required to avoid and minimise impacts to this species.

2.3 Cultural Heritage

The Project Area predominantly falls within the traditional lands of the Ngadjuri Nation, with the southern end of the OTL and Bundey Substation Area within the traditional lands of the First People of the River Murray and Mallee Region. Neoen have been working closely with the Traditional Owners and relevant authorities to ensure that any potential impacts on Aboriginal heritage are managed appropriately an in accordance with cultural and legal obligations. Neoen have undertaken and will continue to undertake cultural heritage surveys by qualified personnel to inform the project planning. The studies to date have indicated that there is a risk of impact to Aboriginal heritage, and hence under the guidance of AGD-AAR Neoen are seeking authorisation from the Minister for Aboriginal Affairs under section 21 and section 23 of the *Aboriginal Heritage Act 1988* (SA) (AHA).

Neoen have developed a good relationship with the Ngadjuri Nation Aboriginal Corporation (NNAC) over the last ten years of working together in the region. In March 2024, an Ethnographic Survey with representatives from Ngadjuri was undertaken. Two known AGD-AAR sites were visited during this survey, though no infrastructure is proposed within the 20 m exclusion zones applied around these sites. Five additional locations were identified in the report as potential cultural heritage sites, mostly associated with natural water sources. Exclusion zones have been established, and findings have informed design refinements to ensure no ground disturbance in these areas.

Neoen conducted an ethnographic survey in November 2024 with the First Peoples of the River Muray Mallee Region (FPRMMR#2) and used the findings to inform project design. These findings found the potential for heritage impacts to be low risk.

Archaeological survey for the GNWF project is scheduled to occur in Q3 2025 for both NNAC and FPRMMR#2 which will further inform the project design and construction, including avoidance areas. Neoen are currently developing a Cultural Heritage Management Plan in partnership with both NNAC and FPRMMR#2 that will contain agreed protocols for appropriate management of Aboriginal heritage, including discovery protocols, in accordance with industry best practice and the preferences for the respective parties.

Broad management actions are incorporated into this CEMP; however, a separate Cultural Heritage Management Plan (sub-plan) will be developed for the Project Area prior to construction commencing.

3.0 Construction Activities and Methodology

3.1 Project Phases and Summary of Works

Four phases of the Project are planned for GNWF, pre-construction, construction, operations and decommissioning, described in **Table 3.1.**

This CEMP relates to the construction phase of the GNWF. Separate plans have been / will be developed, as required, for each of the other phases of development including:

- Operational Environmental Management Plan (OEMP).
- Decommissioning Environmental Management Plan (DEMP).

Table 3.1 Phases of Construction

Component	Activity Description
Commencement of construction	Commencement of all construction activities, including the establishment of laydowns and site compounds, batching plants, meteorological masts, site access road upgrades, WTGs, OTL, substation electrical cabling, permanent facilities. GNWF will either be built in a single stage or via two stages, depending on construction contractor tendering and final energy demand customer negotiations.
Commencement of operations	The formal commissioning of a completed project stage to connect to the electricity network.
Decommissioning	All activities associated with dismantling and removing wind turbines and associated infrastructure at the end of their operational life.

The following sections relate to the construction phase of the Project and outline the relevant components and associated activities.

3.2 Goyder North Wind Farm Components and Construction Activities

Table 3.2 details the specifications and associated approved permanent ('Perm') and temporary ('Temp') Disturbance Footprint (DF) for each of the infrastructure components associated with GNWF.

Table 3.2 Specifications of Infrastructure Components and Associated Activities

Component	GNWF Specifications / Activity Description	Perm. DF (ha)	Temp. DF (ha)	Total DF (ha)
WF Civil	**Includes WTGs, BESS, Substation, Access Tracks**	**267.90**	**132.95**	**400.85**
Hardstand	Permanent and temporary hardstand areas will be required, which are improved / stabilised areas with a prepared surface where plant and cranes can operate, vehicles can be parked, and material can be stored.			

Component	GNWF Specifications / Activity Description	Perm. DF (ha)	Temp. DF (ha)	Total DF (ha)
	Each WTG will have crane hardstand area to support crane operations during the erection of the towers and wind turbine components. These will also be used for scheduled maintenance activities during the wind farm operational and decommissioning phases. The hardstand configuration at each WTG site will be based on either the triangular or rectangular hardstand methods, which will be determined by the topography and terrain.			
Footing	Footings may be either a mass concrete footing (raft style), piled type rock anchors, or a combination of both at approximately 30 m in diameter, most of which would be buried.			
WTG	WTGs are manufactured in separate components and sections will be assembled on site. The WTG specifications are as follows: • Maximum number - 99 • Minimum swept height - approx. 20 m • Maximum swept height - approx. 240 m • Maximum blade length - approx. 95 m • Maximum rotor diameter - approx. 190 m • Maximum rotation speed - approx. 9–10 revolutions per minute (rpm) Designated setbacks are prescribed as below: • A turbine setback of 5.3 km from Burra town centre. • Unless otherwise agreed with the landowner, a minimum distance of 2 km between turbines and occupied dwellings. • A minimum 50 m setback from water courses (including drainage lines) for concreate batch plants. Turbine erection commences with the initial tower section bolted to a stub section embedded within the concrete footing. Subsequent sections are raised by crane and bolted to the section below. The nacelle is then lifted to the top of the tower and secured, followed by fixing the rotor and the individual blades. Once the turbine is constructed, it is subjected to a detailed checking process as part of its commissioning before it can commence unrestricted operation.			
Battery Energy Storage System (BESS)	The BESS has an approximate capacity of 225 MW/900 MWh and will comprise one fenced compound of approximately 5 ha within the wind farm area.			
Substation	Two (or more) fenced compounds of approximately 150 m x 150 m and 80 m x 180 m will be constructed within the wind farm. An extension of the Bundey Substation will be approximately 220 m x 440 m. The transformers will be placed on concrete pads with protective bunding to contain any leak or spill of transformer oil. Electrical infrastructure within the substation compounds will be founded on concrete slabs with gravel surrounds.			
Operations and Maintenance	Operation and Maintenance facilities are permanent facilities contained within the wind farm and are assumed to have a footprint of 70 m x 50 m, however this is subject to change once project stakeholders are finalised. The O&M facility will include a site office, monitoring and communications equipment, control switch room, staff amenities, storage shed, and workshop. Access to these facilities will be from Gum Hill Road (via Belcunda and Lines Road).			
Access Tracks	Tracks to each infrastructure component including turnarounds have been incorporated into each design element (i.e. wind farm, substations and BESS). Tracks will be permanent; however, a temporary disturbance footprint has also been allowed for the civil construction of roads and hardstands of 5 m beyond the outer extents of the civil road and WTG design layer. with an additional 5 m of temporary clearance either side.			

Component	GNWF Specifications / Activity Description	Perm. DF (ha)	Temp. DF (ha)	Total DF (ha)
Overhead Transmission Lines OTL	**A 275 kV or 330 kV multi-circuit overhead line connecting the wind farm substation to the Bundey Substation approximately 48 km south. Transmission lines would also connect the battery to the wind farm substation (approximately 400 m).**	**31.60**	**31.62**	**63.22**
Towers	Transmission towers would be up to 65 m high with a permanent footprint of approximately 27 m x 27 m, spaced approximately 300–500 m apart.			
OTL Access	Access tracks for tower access along transmission lines are required for construction and operational access to each tower. Tracks have been designed to have a width of 6 m, with the disturbance footprint relating to the slope across each track. Where possible, these have utilised existing tracks including public roads, farmers tracks, or access tracks installed for the Goyder South transmission line.			
Construction: Stringing Corridor,	The entire OTL will employ practices of non-conventional line stringing to minimise impacts to MNES and all native vegetation. To enable non-conventional stringing, additional infrastructure includes brake and winch pads, and helicopter pads.			
Helicopter Pads	Two 100 x 100 m helicopter pads have been included in the Disturbance Footprint to accommodate the non-conventional stringing methods. These are placed along the transmission line alignment.			
Brake and Winch Sites	Temporary Brake and Winch sites are required for stringing of the line. This includes two 45 m x 45 m pads and two 10 x 60 m stringing corridors at each turn >30 degrees or at a minimum of every 5.5 km.			
Construction compounds and Facilities	Approximately 7 ha of footprint for OTL construction facilities: • 300 m x 150 m OTL compound x 1 • 150 m x 150 m OTL batch plant x 1			
Other – Ancillary Infrastructure components / activities	**Predominantly temporary components required for construction of the Wind Farm.**	**8.05**	**64.69**	**72.75**
Construction compounds and Facilities	Approximately 38 ha of footprint for construction facilities: • 150 x 150 m construction compounds x 3 • 150 x 150 m laydown area x 1 • 100 x 100 m laydown areas x 3 • 100 x 100 m site security facility x 1 • 150 x 150 m batch plants x 4 • 200 x 50 m stockpile areas x 16			
Underground cabling	Underground cabling for transmission (33–66 kV) and communications (fibre) will connect the WTGs to the substation. All electrical and transmission cables to and from each WTG shall be placed underground. MV cable preferentially placed adjacent to roads, within the 5 m temporary civil construction disturbance footprint either side of the road (temporary disturbance footprint area for civil works). Where it is not practical for cables to run adjacent with roads, a 7 m wide corridor (approximately) will be disturbed for up to three cables, with an additional 2 m for each cable thereafter. All Disturbance Footprint associated with cable trenching and laying (including overlapping temporary civil construction clearance) will constitute temporary disturbance and will be rehabilitated after installation.			
Site Access	Primary access route from Barrier Highway. Primary site access from Barrier Highway will			

Component	GNWF Specifications / Activity Description	Perm. DF (ha)	Temp. DF (ha)	Total DF (ha)
	utilise existing roads including White Hill Road and Belcunda Road. Site access roads will require widening in some locations and trimming of taller vegetation to enable transport of heavy machinery and large infrastructure components. The Disturbance Footprint caters for disturbance at several intersection upgrade locations with Barrier Highway to allow for upgrades and blade sweep. Some minor trimming of non-native vegetation may be required along major transport route; however, this is not included in calculations.			
Met Masts	Up to 15 (9 temporary and 6 permanent) wind monitoring masts up to 140m in height will be installed within the Disturbance Footprint to monitor the performance of the wind turbines against the manufacturer's power-generation guarantees. These will be marked with aviation orange / white stripes, and if guy-wired, equipped with high-visibility cable balls on the outer guy wires. In addition, such towers must be equipped with 5 m high-visibility sleeves, one for each anchor mechanism and each outer guy wire. Each marking mechanism shall be maintained to ensure their visibility and attachments to the wires are maintained. The wind monitoring masts are considered to be tall structures and will be reported to the Vertical Obstacle Database managed by Airservices Australia.			
Micro-siting	Micro-siting is proposed as an extension of application of the mitigation hierarchy, to continue to avoid and minimise impacts from all project infrastructure into design finalisation and construction The micro-siting process will be undertaken primarily to minimise site impacts on EPBC Act listed MNES and other environmental assets as required, as well cultural heritage sites of value The head contractor will work with specialist advisors to undertake the micro-siting process and develop the final site designs. The Total Disturbance Footprint is that which is approved at the time of writing this Plan. Micro-siting will only seek to reduce the approved Disturbance Footprint, and will not, under any circumstance, result in an increase to the approved Disturbance Footprint. If an increase to the approved Disturbance Footprint is required, which increases the approved limit of disturbance area for any MNES, an EPBC variation will need to be submitted to DCCEEW to increase the impact limit and ensure compliance with the approval.			
Decommissioning of temporary facilities	Temporary construction facilities that are not required for operational activities of the wind farm will be removed during the construction process and on completion of construction activities and the areas rehabilitated in accordance with a Rehabilitation Plan			
Rehabilitation	Site rehabilitation will be an ongoing process to stabilise and restore areas that will not be subject to ongoing impacts. Areas for rehabilitation will be prioritised, with vegetation constituting MNES or MNES habitat and other high value vegetation rehabilitated first.			
	Total Disturbance Footprint (ha)	**307.56**	**229.26**	**536.82**

3.3 Work Phases, Project Staging and Construction Timing

The following sections describe a typical construction methodology for wind farm development that could apply to the Project. The Engineering, Procurement and Construction (EPC) contractor will be responsible for the detailed construction methodology for the Project.

Construction will occur according to four broad phases. The indicative implementation and timing of these phases is summarised in **Table 3.3.** Construction contractor tendering and final energy customer negotiations will dictate whether GNWF is constructed in one single stage or across a Stage 1 and 2. Given a date to commence construction is not available at the time of writing this CEMP, some dates have been given as months before or after the Project's Notice to Proceed (NTP) milestone.

Table 3.3 The Phases of Activity and their timing for GNWF

Phases	Activity	Date (approximate)
Site establishment and preliminary works	Geotechnical assessment	Targeted campaigns in 2025 and 2026
	Design development and optimisation	Current to NTP + 12 months
	Approvals and licensing	2023-2026
	Meteorological masts	2026 (except for those installed for site feasibility)
	Procurement	Q3 2025 NTP + 12 months
Mobilisation on site and site office establishment	Bench preparation	NTP + 3 to 9 months
	Site office and facilities establishment	NTP + 3 to 6 months
	Construction compound establishment	NTP + 3 to 6 months
	Batching plant installation, test, and commission	NTP + 3 to 9 months
	Construct and upgrade site entry points	NTP + 3 to 18 months
Civil, electrical and installation works	Transport route roads and intersection upgrades	NTP + 6 to 18 months
	Roads and platforms established	NTP + 6 to 18 months
	Hardstands and footings	NTP + 6 to 18 months
	Wind turbine generators	NTP + 12 to 30 months
	Electrical services	NTP + 12 to 30 months
	Testing and commissioning	NTP + 15 to 36 months
Demobilisation	Demobilise site	NTP + 36 months
	Implement rehabilitation activities	NTP + 6 to 36 months

The construction period for the Project will be agreed between the EPC contractor and Neoen and will be subject to change depending on weather conditions, availability of sub-contractors, materials and construction speeds. At present, the construction timeframe is estimated to be between 24–36 months.

Subject to Project approvals, construction of the Project is anticipated to commence in the first half (H1) of 2026 and conclude in Q4 2028.

During the construction phase, works will typically occur for seven days a week, and up to 12 hours per day (0700 to 1900). During certain construction activities, such as concrete foundation pours and turbine lifts, works may be required to run longer than 12 hours for safety and quality purposes. It may also be necessary for other construction activities to take place during the evening/night. In such instances, appropriate mitigation and management measures will be incorporated into the CEMP. These assumptions will be revisited and modified as necessary during detailed design.

A detailed construction schedule including the key construction tasks, likely order of completion and anticipated timeframes, will be provided and appended to this CEMP once the contractors have been selected and engaged.

3.4 Equipment and Machinery

The major equipment and machinery that is likely to be used for each component of construction of the Project includes:

- For site mobilisation: track loader, grader, backhoe, trucks, small and medium sized cranes and generators.
- For access roads and hardstands: bulldozers, track loaders, excavators, graders, trucks (with trailer), water carts and rollers.
- For hardstands: excavators, rock breaker, concrete trucks, trucks (with trailer and vacuum), water trucks, concrete pumps, bulldozers and rollers.
- For wind turbines: larger crawler cranes, large and medium cranes, and generators.
- For electrical reticulation works trencher, backhoe, excavator, grader, tractor and small terrain crane.
- For OTL stringing helicopter/drone, trucks, elevated work platforms, and associated heavy stringing equipment.

Other equipment and machinery may be required, depending on the construction techniques nominated in the detailed design phase.

It is expected that one of each turbine component type will be delivered in a single day during the haulage operation (i.e., one blade, one tower section, nacelle, cooling tower, and turbine hub). Each individual component will be carried on a single oversize over mass vehicle.

3.5 Construction Water Supply

The provision of water will be essential for the construction of the Project. Construction activities likely to require water are:

- geotechnical investigations
- bulk earth works and material conditioning
- stripping
- dust suppression
- concrete batching.

Water demand will vary over time, depending on the stages of the work. The expected water requirement during construction will be calculated during the detailed design of the Project.

Water demands for the Project will require different water quality standards. Potable water fit for human consumption will be required at the site offices, while both medium quality (suitable for use in the concrete batching) and low-quality raw water (for earthworks and dust suppression) may be used for construction purposes. Water will be tested from various supply options and allocated to the most appropriate use.

Neoen aims to require no on-site treatment, however this will depend on the quality of water available. A water sourcing strategy will be developed so that water used during the construction phase is abstracted at sustainable rates and does not cause issues to landowners or other stakeholders. Generally, potable water will be obtained from the local government water reticulation network where possible, while the proposed source of raw water (medium and low quality) is likely to be sourced from:

- groundwater
- surface water
- offsite, trucked in.

To avoid interfering with stream flow in the riparian zone, water for construction and for irrigation of revegetated areas will be obtained from a source other than local waterways.

Sustainable construction water supply options will be determined during the detailed design of the Project in consultation with local landholders and confirmed with the relevant local Department of Environment and Water (DEW).

3.6 Construction Workforce

The Project is expected to generate multiple employment opportunities. However, it is estimated that the maximum (peak) workforce will compromise approximately 350-450 staff over 36 months (this is also dependant on the size of the final project). Up to 15 permanent staff to be employed during operations.

A Local Procurement plan forms part of the risk management for socio-economic impacts of the Project. As such, it is expected that some of the workforce will commute from local areas such as Burra, Clare and surrounding localities and will not require additional accommodation.

For the larger workforce required for the construction period, additional workers from outside of the local region will be required. Other workers are intended to be accommodated in a temporary workers accommodation facility, an option that is currently being developed in consultation with the council, as well as temporary local rental houses, hotels and motels in the GRC area and beyond, to ensure the community is well placed to capitalise on benefits of the project without overwhelming local accommodation options.

4.0 Environmental Management Framework

Facilitating environmental awareness and managing environmental issues during construction activities is essential for successful and responsible project management. It requires the active consideration of environmental issues and health and safety as a prerequisite to all construction operations. Environmental management during construction of the GNWF will be governed by the Environmental Management System (EMS) outlined in this CEMP (**Figure 4.1**).

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

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

This section presents the EPC Contractor's Environmental Policy and the structure of the EMS that will govern the construction of GNWF.

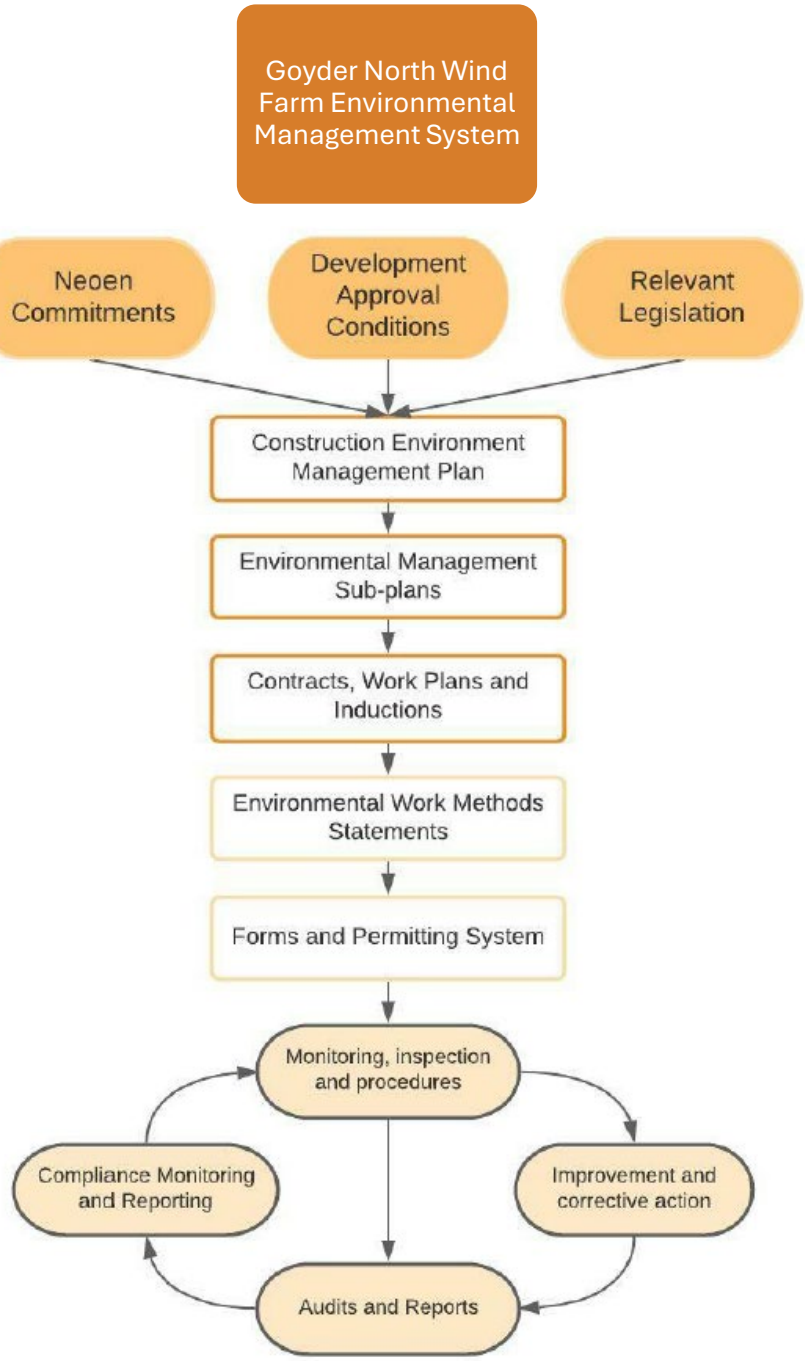


Figure 4.1 Goyder North Environmental Management System

4.1 Environmental Policy

4.1.1 Neoen Environmental Policy

Neoen is committed to provide a healthy and safe working environment for its employees, guarantee the integrity of the company's assets and protect the environment. Neoen has a Health Safety and Environmental Policy which outlines their commitments (**Appendix E**).

4.1.2 EPC Contractor Environmental Policy

The EPC Contractor's Environmental Policy will be added to the CEMP once the contractors have been finalised.

4.2 Environmental Management System Structure

The EPC Contractor is responsible for meeting GNWF project commitments, regulatory requirements and approval conditions. The following management systems and tools will be utilised to ensure effective implementation of this CEMP (**Table 4.1**). This structure will be updated once the EPC Contractors have been finalised.

Table 4.1 Management Tools Utilised by the EPC Contractor

Management Tool	Description
Environmental Risk Register	An Environmental Risk Register will be developed for the Project based on the risks outlined in this CEMP. Contractors will be required to develop their own environmental risk register specific to their scope using the Project Environmental Risk Register (currently under development) as a guide.
Regulatory Compliance and Permitting System	Ensures all construction activities comply with local, state, and federal environmental regulations and obtain necessary permits.
Data and Document Management System	In place to manage updates to documents, permits and construction design, with appropriate approval and distribution to relevant teams.
Inductions and Environmental Awareness Training	All employees, subcontractors and site visitors will complete a site-specific environmental induction prior to commencing work on the GNWF Site. The specific environmental induction will include safety, access and review of environmental constraints and management requirements.
Pre-clearance Checks	Pre-clearance checks will be implemented across the Disturbance Footprint by a suitably qualified ecological consultant prior to any vegetation disturbing works are undertaken. Pre-clearance checks will identify opportunities for micro-siting to further reduce impacts based on the findings.
Micro-siting	Micro-siting will be applied where technically feasible to further avoid and minimise ecological impacts.
Monitoring, Inspections and Auditing	Regular inspections, environmental monitoring, and reporting to track compliance and effectiveness of management measures. Periodic audits and reviews to identify potential non-compliance, assess the effectiveness of the CEMP and make necessary adjustments.

Management Tool	Description
Work Health and Safety (WHS) Systems	The Contractor's WHS system will provide a foundation for inductions and drive safety standards for all staff and contractors. Safe Work Method Statements (SWMS) will be developed on an as needed basis to provide detailed instructions on how specific construction tasks should be performed, to ensure that activities are conducted in a way that protects the environment and personnel.
Incident Response	Procedures and tools in place to ensure that all activities adhere to local state and federal environmental regulations and identify and document any non-compliant events, for prompt corrective action. Includes development of mandatory Emergency Response procedures and tools for managing external complaints.

4.2.1 Permitting System

Site inspections will be used to control work activities on site. To proceed with work (that involves ground disturbing activities, such as, but not limited to clearing and grubbing and excavation) in an undisturbed area, an inspection will be required, and this will need to be signed off by the Project, Construction or Environmental Manger. Following the same process, an inspection can bring about a stop work when signed off by the Project, Construction or Environment Manager.

Further details on the regulatory requirements and conditions of approval are presented in **Section 5.0.**

4.2.2 Data and Document Management System

Effective data management is essential to minimise risk of non-compliance incidents. The EPC Contractor will be responsible for ensuring that the Project Team including contractors and subcontractors are aware of all schedule and design updates.

- All survey data, maps and documentation, including this CEMP, will be stored in a centralised, shared Electronic Document Management System (EDMS). Document control will be managed by a designated Quality Manager at the Project Office.
- All relevant team members will have access to the EDMS with appropriate permissions.
- Any proposed design or schedule changes trigger a 'stop-work' procedure in that location until changes have been through the official data management process.
- Any proposed design or schedule changes will be reviewed by the appropriate delegate (i.e. Project Manager / Construction Manager / Project Engineer/ Environmental Manager). During this process:
    - Any conflicting issues will be raised and resolved (i.e. scheduling, design outside of the approved scope, unacceptable environmental impacts)
    - Appropriate approvals will be sought, if required.
- When design, schedule or document changes occur, the Quality Manager will notify all personnel on a designated distribution list via email and the EDMS. A summary of changes, along with the updated (dated) documents / spatial data will be uploaded to the EDMS by the Quality Manager.
- A change log will be maintained to track all modifications and approvals.
- Relevant changes will be discussed as an update at daily pre-start meetings.

- Ensure all team members understand the updated design and their specific responsibilities.
- All relevant personnel involved in the environmental management process will be expected to maintain a document control system for recording environmental management activities (i.e., inspections, incidents, complaints and monitoring activities).
- Environmental records will be maintained by the Quality and Environment Managers in digital register. Records required for approvals or licences will be available upon request to any authorised person.

4.2.3 Inductions and Environmental Awareness Training

Environmental inductions, training and meetings will be delivered throughout the Project to ensure the relevant aspects of this CEMP are communicated to the Project team including contractors and subcontractors, and to ensure all parties understand their environmental management obligations. The following will be undertaken during the Project:

- Project Specific Environmental Induction: All personnel involved in the Project will be required to attend a project specific environmental induction prior to undertaking any works on site. The induction will include environmental, land access and heritage information.
- Land Clearing Training: All personnel involved in the clearing of native vegetation will be required to attend a training package that lists all mitigation measures to be implemented prior to and during clearing activities. The training package will also include information on reporting of land clearing activities.
- Daily Pre-Start Meetings: These will be undertaken on a daily basis on site prior to commencing the daily activities. They will include an environmental component whereby any activities planned for the day that have potential environmental impacts will be discussed and management measures agreed upon.
- Monthly Environmental Toolbox Talks: These will be undertaken on site once a month and will be facilitated by the Health Safety and Environment (HSE) Manager or nominated representative. Topics will vary each month and will be relevant to the Project. Examples include threatened fauna and flora management, waste management, weed prevention and matters of national environmental significance relevant to the Project Area.
- Sub-contractor Start-up Meetings: The agenda for Sub-contractor Start-up Meetings will include an environmental component. Items to be discussed, include, but are not limited to:
    - key environmental factors applicable to the Project
    - contents of the CEMP
    - contractor CEMP requirements
    - environmental management expectations
    - monitoring and reporting requirements
    - audits and inspections.
- Educational Materials: Relevant to Project environmental constraints, will be placed throughout the work site to ensure that all personnel have easy access to important environmental information. This may include (but not be limited to) fact sheets on MNES (INTG TEC, PBTL), threatened flora identification, waste management, ecological and cultural heritage no-go zones.

4.2.4 Pre-clearance Checks (PCC)

Pre-clearance checks (PCC) are a critical component of the CEMP, designed to ensure that all areas within the Disturbance Footprint are thoroughly assessed before the commencement of construction activities and the removal of any vegetation or modification to the environment. These checks are essential for identifying and marking environmental constraints such as threatened flora and fauna, threatened ecological communities, hollow-bearing or otherwise significant trees for retention, and priority weed species.

The PCC process involves detailed surveys of the Disturbance Footprint by qualified ecologists, to identify the presence of sensitive species and habitats and identifying any opportunities to reduce impacts on native vegetation, species or habitat features, thereby informing the micro-siting of infrastructure.

Specific requirements are detailed for certain species and communities, including:

- Threatened flora.
- Threatened fauna, especially low mobility fauna such as small reptiles (i.e. Pygmy Blue-tongue Lizard and Flinders Ranges Worm Lizard).
- Significant or hollow-bearing trees.
- Wombat warrens.
- Watercourses.
- Declared weeds.

These PCC surveys aim to:

- Ensure that all areas proposed for clearance have been assessed on-ground by qualified ecologist prior to any vegetation removal or modification.
- Identify opportunities to reduce impacts on native vegetation, habitat features and fauna, thereby informing the micro siting of infrastructure prior to construction.
- Ensure that any areas of ecological significance are adequately delineated prior to any works commencing. This delineation process forms part of the construction management measures to ensure that no unauthorised clearance occurs.

Specific sub-plans have been developed for:

- Iron-grass Natural Temperate Grassland Threatened Ecological Community Management Plan (INTG TEC MP) (Umwelt, 2025).
- Pygmy Blue-tongue Lizard Management Plan (PBTL MP) (Umwelt, 2025)).

PCC surveys will be scheduled sufficiently in advance to ensure that ecologists can be recruited, and the necessary work can be completed prior to proposed construction. However, they will not be planned so far in advance that the findings become outdated by the time construction begins. This approach ensures that the data remains current and relevant, allowing for accurate and effective micro siting decisions (**Figure 4.2**).

PCC surveys will require a report be issued at the conclusion of each survey session which details the findings of the survey, and the approval to proceed with vegetation disturbing activities including:

- Surveyor, qualifications and required permitting.
- Date.
- Location (including map and spatial data).
- Findings (i.e. flora / fauna sightings).
- Management actions undertaken and outcomes (i.e. micro-siting to avoid three PBTL; or identified opportunity for micro-siting around INTG, no-go zone demarcated)
- Recommendations (i.e. relocation of X PBTL required X days prior to vegetation disturbance works commencing in X location).

Figure 4.2 Flowchart and Hierarchy of Pre-clearance Checks

4.2.5 Micro-siting Procedure

Following initial PCC, the ecological consultant will identify areas where micro-siting (slight shifts or adjustments) should be considered to avoid or minimise impacts on an ecological (or other) matter. For example, to avoid individuals or populations of threatened species, to reduce impacts to native vegetation and threatened ecological communities or to minimise impacts on waterways.

Micro-siting (shifting or adjusting slightly) will be done via consultation with the ecological consultant and engineer to determine the best ecologically and technically feasible option. If micro-siting options are identified, additional PCC will be undertaken at the proposed site to determine if the ecological impact is lower than at the original proposed site.

Micro-siting adjustments to the design will be logged via the EPC data and document management system and distributed. All changes will be discussed in pre-construction meetings and final design distributed to machine operations and onsite staff will be approved by Construction Manager (**Figure 4.2**).

Desired outcomes for micro-siting works are listed in **Table 4.2.**

Table 4.2 Mico-siting Desired Outcomes

Ecological Matter	Desired Outcome
EPBC Listed Threatened Flora (any)	No impacts to any EPBC listed threatened flora species.
EPBC Listed Threatened Fauna (PBTL, FRWL)	Impacts on individuals avoided or minimised. Impacts on habitat minimised (lower than authorised)
Threatened Ecological Community (INTG)	Impacts on INTG reduced.
NPW Act Listed Threatened Flora	Impacts to individuals or populations minimised
Southern Hairy-nosed Wombat	Impacts to active burrows of Southern Hairy-nosed Wombats avoided.
Native vegetation	Impacts to native vegetation reduced. Impacts to hollow bearing trees avoided or minimised.

4.2.6 Monitoring, Inspections and Auditing

Environmental inspections will be regularly conducted on site to audit compliance against the requirements of this CEMP. Inspections will include daily site environmental inspections by Supervisors and weekly site environmental inspections by the Senior Environmental Advisor (or delegate).

Audits will also be undertaken on a regular basis to ensure the Project is being constructed and operated in accordance with legal and CEMP requirements. The following audits will be undertaken as a minimum throughout the Project:

- Mobilisation audits (to be undertaken within 3 months of EPC Contractor and/or other sub-contractor mobilisation) to ensure the Contractor's site has been established and work is being undertaken in accordance with this CEMP and other legal requirements.
- Quarterly audits carried out by independent third-party auditors of the EPC Contractor's site (incorporating sub-contractors' sites), works and systems to ensure compliance with this CEMP and legal requirements.

- Annual legal compliance audits (where required).
- Demobilisation audits of EPC Contractor's and/or other sub-contractor's site and systems.
- An audit and inspection schedule will be developed by Neoen's / EPC Contractor's Team prior to construction commencing. This will be reviewed and updated on a quarterly basis in response to new legal requirements and findings of previous audits.
- The EPC Contractor and sub-contractors will be required to develop their own audit and inspection schedule which will need to be reviewed and approved by Neoen prior to mobilising to site.

4.2.7 Work Health and Safety Systems

The EPC Construction contractor will have a Workplace Health and Safety (WHS) system in place to manage safety on the Project. At a minimum, the WHS system should include a WHS Management System, WHS Management Plan and Safe Work Method Statements (SWMS) (or equivalent) for required works.

4.2.8 Environmental Incident Response

4.2.8.1 Environmental Incident Management

An environmental incident is an event that causes damage to the environment, a cultural heritage value/site, a non-compliance against a regulatory requirement or disruption to the community leading to a community concern. In the event of an environmental incident that causes damage to the environment, management actions will be implemented immediately where safe to do so. For near misses related to potential environmental incidents, an internal reporting procedure will be in place to assess controls and ensure current actions will not lead to a reportable environmental incident.

A Chance Find Procedure (or similar) will be in place to outline actions required if previously unknown environmental or heritage sites are encountered during construction. The procedure will include (but not be limited to):

- Stop Work: to be implemented within the vicinity of the find.
- Alert: any finds are reported immediately to the Construction Manager and HSE Manager.
- Report: including details and photos of any find.
- Safeguard: the site, area or object to prevent damage or loss.
- Evaluate: the findings by appropriate qualified personnel / authority.
- Notify: relevant authorities of any finds and obtain relevant permissions / advice to proceed, if required.
- Mitigate / Protect: the potential for impact / the site according to the findings and recommendations of the qualified personnel / authority.

4.2.8.2 Environmental Incident Reporting

All site personnel and contractors are responsible for reporting environmental incidents to the Senior Environmental Advisor or equivalent management personnel.

The Senior Environmental Advisor (or equivalent) must be verbally notified about the environmental incident as soon as possible, and in any case, no longer than four hours after the event. A written account of the event must be provided to the Senior Environmental Advisor (or equivalent) within 24 hours of the event.

For all environmental incidents and near misses, the Senior Environmental Advisor (or equivalent) will verbally inform the Construction Manager, Safety Manager and Project Manager as soon as practicable. For significant environmental incidents (e.g., unauthorised clearing, unauthorised impact to MNES, hazardous waste spill with the potential to cause serious or material environmental harm) (in accordance with the EP Act), or where required legally, the Senior Environmental Advisor (or equivalent) will notify the relevant regulatory authorities.

Project personnel and contractors must obtain approval from Neoen prior to notifying any regulatory agencies of incidents.

4.2.8.3 Environmental Incident Investigation

All environmental incidents must be investigated, and a report detailing the incident event must be submitted in writing to the Senior Environmental Advisor (or equivalent), and must include the following details:

- Details of the environmental incident.
- Timeline of events that led to the environmental incident.
- Causes or contributing factors to the environmental incident.
- Controls that would have prevented the environmental incident from occurring.
- Corrective and preventative actions (i.e. adaptive management) to avoid recurrence.

All near misses should be reported to the Senior Environmental Advisor (or equivalent) with details of the event, potential causes and suggested preventative actions outlined. Further investigation and reporting may be warranted based on the severity or potential severity of the near miss incident. This will be determined on a case-by-case basis by the Senior Environmental Advisor (or equivalent).

4.2.8.4 Complaints Procedure

A Complaints Procedure will be developed to address complaints and concerns from the broader community based on the Australian Standard *Guidelines for complaint management in organizations* (AS 10002:2022, ISO 10002:2018). This will include:

- Establishment of a project hotline for complaints (phone, email, mail).
- Standard documentation and record keeping procedures to register communications including:

Specified timeframes for acknowledgment and response / follow-up if complicated.

- Complaint investigation, including keeping records of meetings, discussions and activities.
- Resolution of complaint with complainant including detailed findings and proposed resolutions and clarification of resolution.
- Complaint closure including confirmation with complainant and on Complaints Register.
- Escalation / review pathway via Neoen to be available for complainant if unsatisfied with investigation and resolution.

4.2.8.5 Emergency Response

A Project Emergency Management Plan will be developed to address management responses to potential environmental emergencies, as well as health and safety emergencies. The plan will include but not be limited to:

- Potential environmental emergencies.
- Actions and associated procedures required to mitigate the environmental impact from emergencies.
- Emergency response training and competencies.
- Appropriate emergency response equipment.
- Evacuation procedures.
- Communication procedures (immediate and follow up).

5.0 Regulatory Requirements and Conditions of Approval

5.1 Regulatory Requirements

Regulatory requirements that have guided Project approvals and the preparation of this CEMP are summarised in **Table 5.1.** The table also lists relevant standards and guidelines that have assisted in the development of the CEMP and environmental management strategies. The conditions described by Ministerial Delegation on GNWF Project from DA relevant to CEMP are listed in **Table 5.2**. There are placeholders to fill in the details required for **Table 5.3** and **Table 5.4**, pending approval conditions for both EPBC and Native Vegetation.

Table 5.1 Legislative Requirements and Standards

Area	Legislative and other Requirements
Construction – general	*Environment Protection Act 1993* (SA) *Work Health and Safety Act 2012* (SA) Work Health and Safety Regulations 2012 (SA) *Hydrogen and Renewable Energy Act 2023* (SA) *Planning Development and Infrastructure Act 2016* (SA)
Construction – wind	*Electricity Act 1996* (SA) *Green Industries SA Act 2004* (SA)
Air Quality	*Environment Protection Act 1993 (EPA Act)* (SA) Environment Protection (Air Quality) Policy 2016 (SA) National Environment Protection (Ambient Air Quality) Measure 2003 (Cth) National Environment Protection (Diesel Vehicle Emissions) Measure 2001 (Cth) *Ozone Protection and Synthetic Greenhouse Gas Management Act 1989* (Cth)
Biodiversity (Flora and Fauna)	*Environment Protection and Biodiversity Conservation Act 1999* (Cth) *Biosecurity Act 2015* (Cth) *Landscape South Australian Act 2019* (SA) Landscape South Australia Regulations 2020 (SA) *National Parks and Wildlife Act 1972* (SA) National Parks and Wildlife Act Regulations 2019 (SA) *Native Vegetation Act 1991* (SA) Native Vegetation Regulations 2017 (SA)
Cultural Heritage	*Aboriginal and Torres Strait Islander Heritage Protection Act 1984 – Amended 2016* (Cth) *Native Title Act 1993* (Cth) *Aboriginal Heritage Act 1988 – Amended 2016* (SA) *Heritage Places Act 1993* (SA)
Erosion and Sediment Control	*Environment Protection Act 1993* (SA) *Best Practice Erosion & Sediment Control. International Erosion Control Association (IECA) Australasia Chapter (2008) – Book 1*

Area	Legislative and other Requirements
Fire Management	*Fire and Emergency Services Act 2005* (SA) *SA State Bushfire Management Plan 2021-2025* SA State Emergency Management Plan – Part 2 Arrangements 2018 Flinders Mid-North Yorke Bushfire Management Area Plan 2017
Land Use	*Planning Development & Infrastructure Act 2016* (SA) *Local Government Act 1999* (SA) *Heritage Places Act 1993* (SA)
Noise and Vibration	*Environment Protection Act 1993* (SA) Environment Protection (Noise) Policy 2007 (SA) Wind farms environmental noise guidelines 2021(SA)
Transport of Dangerous Goods	*Dangerous substances Act 1979* (SA) Dangerous Substances (Dangerous Goods transport) Regulations 2017 (SA) Australian Code for transport of Dangerous Goods by Road and Rail (Ed 7.7)
Waste Management	*Environment Protection Act 1993* (EPA Act) (SA) Environment Protection (Waste to Resources) Policy 2010 (SA) South Australian Public Health (Wastewater Regulations) 2013 (SA)
Water Quality	*Environment Protection Act 1993* (SA) Environment Protection (Water Quality) Policy 2015 (SA) *Landscape South Australia Act 2019* (SA) Landscape South Australia Regulations 2020 (SA)

5.2 Conditions of Approval

Table 5.2 Conditions Described by Ministerial Delegation on GNWF Project from DA relevant to CEMP

Approval Reference	Condition	Timing	Where requirement is addressed
Conditions and advisory notes imposed by the Commissioner of Highways under Section 122 of the Act			
Condition 11	The applicant shall ensure that all stormwater generated by the proposal and associated road upgrades is appropriately collected and disposed of without entering or jeopardising the safety of the adjacent arterial road network.		
Conditions and advisory notes imposed by the Native Vegetation Council under Section 122 of the Act			
Condition 12	Prior to any clearance of native vegetation, the Native Vegetation Council must provide written confirmation that the Significant Environmental Benefit requirements under the *Native Vegetation Act 1991* have been satisfied.		
Advisory Note 5	The clearance of native vegetation must be undertaken in accordance with an approval from the Native Vegetation Council under the Native Vegetation Act 1991.		

Approval Reference	Condition	Timing	Where requirement is addressed
Conditions imposed by Environment Protection Authority under Section 122 of the Act			
Condition 13	Noise levels at noise sensitive receivers in the vicinity of the wind farm development must meet the requirements of the EPA's Wind farms environmental noise guidelines 2021. The noise levels at the relevant receivers must not exceed the greater of: • 35 dB(A) if receivers are situated in the Rural Living zone, or • 40 dB(A) if receivers are situated in a Primary Production or zones other than Rural Living, or • the background noise (LA90,10) by more than 5dB(A) when assessed against provisions of the EPA's Wind farms environmental noise guidelines 2021.		
Condition 14	A final pre-construction noise assessment must be submitted which confirms compliance with the applicable operational criteria based on the final wind turbine generator selection, layout and warranted sound power levels prior to the construction of the wind farm. The warranted sound power levels must be measured and Page 24 of 27reported in accordance with IEC61400-11 Ed3.0; Wind turbines – Part 11: Acoustic noise measurement techniques.		
Condition 15	Background noise assessment must be undertaken prior to the start of any construction work at 7 localities: GN15, GN47, GN54, GN57, GN62, GN65, GN91 (as shown in Attachment B of the further information letter provided) or such other localities agreed to by the State Commission Assessment Panel (SCAP), having consulted with the Environment Protection Authority. Background noise assessment must be undertaken in accordance with the EPA's Wind farms environmental noise guidelines 2021.		
Condition 16	The final pre-construction noise assessment report must be submitted to the State Commission Assessment Panel who should confirm its satisfaction, having consulted with the Environment Protection Authority prior to the commencement of construction of the wind farm.		
Advisory Note 6	The applicant/owner/operator is reminded of the general environmental duty, as required by section 25 of the *Environment Protection Act 1993*, to take all reasonable and practicable measures to ensure that activities on the site and associated with the site (including during construction) do not pollute the environment in a way which causes or may cause environmental harm.		
Advisory Note 7	An environmental authorisation (licence) is required for this development. Before commencing operation, the applicant/operator should contact the Environment Protection Authority on (08) 8204 2058 or email EPALicensing@sa.gov.au for information about the licensing application process and requirements.		

Approval Reference	Condition	Timing	Where requirement is addressed
Advisory Note 8	The proposed activity of concrete batching will require an environmental authorisation from the EPA. Should the proponent determine that the concrete batching plants are required, the EPA should be contacted and provided with the following as soon as practicable prior to the EPA licence application stage: • a detailed site layout plan, specifying locations of plant/equipment and associated traffic flow • a site-specific stormwater management plan, and • a final version of CEMP.		

Table 5.3 EPBC 2024/09929 Approval Conditions

Ref.	Cond.	Condition Requirement	Plan Reference	Demonstration of how the plan addresses condition requirements and commitments made in the plan to address condition requirements
1				

Table 5.4 Native Vegetation Clearance Approval Conditions

Approval Reference	Condition	Where requirement is addressed	Demonstration of how the plan addresses condition requirements and commitments made in the plan to address condition requirements
1.	The applicant must ensure that only native vegetation approved for removal in accordance with this decision is removed. Prior to clearance commencing, the applicant must advise all persons undertaking the vegetation removal or working on site, of all relevant conditions of approval and associated statutory requirements.	Design plans issued for construction inductions procedure	

5.3 Neoen's Commitment to Avoiding and Minimising Impacts

Neoen has employed the mitigation hierarchy throughout the development and design phase of the Project. This has included commissioning of extensive ecological, technical and heritage site surveys that have informed multiple design iterations to avoid and minimise impacts. Measures outlined in **Table 5.5** are additional measures applied through pre-construction, construction, operation and beyond as ongoing application of the mitigation hierarchy.

Table 5.5 Additional Commitments Made by Neoen to Avoid, Minimise and Mitigate Impacts of the Project

Commitment	Timing	If applicable, where is this addressed in the CEMP?
Community Outcomes Neoen will provide community benefits throughout the life of the GNWF Project via the Goyder Renewables Zone Community Benefit-Sharing Program. This fund was established for Goyder South Wind Farm initially and will receive further contributions through Goyder North Wind Farm. The Fund covers the life of the operating assets and beyond, incorporating three streams: • Annual Community Fund • Major Projects • Future Fund. The Fund will be administered via a Community Enterprise Foundation and a co-designed Local Advisory Committee that incorporates two representatives from Council, four from the community and one from Neoen. This administrative arrangement evolved from extensive stakeholder consultation over six years.	Pre-construction Construction Operation and beyond	NA – not detailed in this CEMP.
Micro-siting Micro siting is an extra measure to enable final adjustments to the Disturbance Footprint in alignment with the Mitigation Hierarchy to avoid or minimize impacts on environmental values, cultural heritage or any other potential constraints that emerge during design finalization and construction. The EPC Contractor will work with Neoen's specialist advisors to undertake this process and develop final site designs and to comply with, at a minimum: • Any Development Approval conditions. • EPA noise level limits. • Constraints to minimise aviation impacts. • Project adopted setbacks. • Occupied dwelling setbacks for turbines. • Avoidance and minimisation of impacts on sensitive flora and fauna, and general minimisation of native vegetation clearance. • Areas of cultural value. • Any agreements with involved landowners, neighbours, and tenement-holders under the Mining Act.	Pre-construction	CEMP **Section 4.2.5**
General Environmental Impacts Neoen commits to the preparation and / or finalisation of Management plans including: • Construction Environment Management Plan (this Plan) • MNES specific Management Plan(s) (for example PBTL Management Plan and INTG TEC Management Plan).	Pre-construction Construction Operation Decommissioning	CEMP and sub plans

Commitment	Timing	If applicable, where is this addressed in the CEMP?
• Operational Environmental Management Plan. • Sub-plans as outlined in **Section 12.0.** • All plans will be written in accordance with industry standards and requirements. The Project site will also follow a decommissioning plan to dismantle infrastructure and rehabilitate disturbed land at the relevant times.		
Setbacks Neoen commits to a series of setbacks including: • A turbine setback of 5.3 km from Burra town centre. • Unless otherwise agreed with the landowner, a minimum distance of 2 km between turbines and occupied dwellings. • A minimum 50 m setback from water courses (including drainage lines) for concreate batch plants. • A turbine setback of 500 m from Tiliqua Nature Reserve • A turbine setback of 450 m from Mokota Conservation Park • A turbine setback of 500m from known Wedge tailed Eagle nests		
Ecology A number of ecological constraints are present for the Project for which specific management measures have been put in place. Areas of avoidance include: • Iron-grass Natural Temperate Grassland (Class B and Class C) will be displayed on maps and avoided where they occur outside of the approved Disturbance Footprint. Any micro-siting will seek to reduce impact in these areas. A site specific INTG MP sub-plan is in place which describes actions to minimize impact to INTG TEC. • Areas of known PBTL populations will be micro-sited to minimise impact. Relocation of individual PBTL within Disturbance Footprint will occur prior to construction as a final avoidance measure. A site specific PBTL Management Plan sub-plan describes actions to minimize impact to PBTL. • *Acacia spilleriana* (Spillers Wattle) individuals on Gum Hill Road. The Disturbance Footprint and Development Envelope has avoided this location. • *Dodonaea procumbens* (Trailing Hop-bush) (Mokota Conservation Park) which will have specific management measures in place to prevent indirect impact. • Protected areas including Mokota Conservation Park and Mimbara Conservation Park. • Private reserves / sanctuaries including Tiliqua Nature Reserve and Heritage Agreements. • Neoen has recorded locations of known raptor nest sites and have established buffers exceeding 500 m around a known Wedge-tailed Eagle nest in the south of the WF.	Pre-construction Construction	CEMP **Section 8.3** and **Section 8.4**

Commitment	Timing	If applicable, where is this addressed in the CEMP?
Neoen are also monitoring activity of this nest and have confirmed that it has not been utilised as a breeding site in recent years. • Areas with active wombat warrens.		
Visual Impact and Shadow Flicker Neoen has committed to minimising visual impacts, including Shadow Flicker, to residents, landowners and walkers of the Heysen Trail. Mitigation measures such as non-reflective coatings on the wind turbines, targeted screen plantings etc. will be implemented where appropriate and the removal of trees will be minimised. Rehabilitation of disturbed areas will be untaken progressively to maintain amenity as well as environmental health.	Pre-construction Construction Operation	Not addressed in CEMP. Shadow flicker is an operational impact and will be addressed, where applicable in a site specific OEMP.
Noise Neoen will minimise noise impacts and comply with relevant noise policy and guidelines by: • Compliance with EPA noise limits • Noise assessment during micro-siting stage • WTG selection that is free of tonality • Preparation of a Construction Noise and Vibration Management Plan. • Potential noise impacts to PBTL are assessed in the PBTL Management Plan.	Pre-construction	CEMP **Section 8.7**
Cultural Heritage Neoen will manage potential risk to Aboriginal and European heritage by implementing measures outlined, in addition to heritage survey and design iterations conducted throughout development phase already applied to avoid impacts to areas of cultural value. Neoen has applied to Aboriginal Affairs and Reconciliation (AAR) for authorisation pursuant to sections 21 and 23 of the *Aboriginal Heritage Act 1988* (SA). Under this authorisation, Neoen will minimise impacts to Aboriginal heritage as far as is practicable and will need to carry out authorised activities according to the prescribed conditions, including: ,: • Adherence to the Cultural Heritage Management Plans (CHMP) developed in consultation with the Ngadjuri Nation Aboriginal Corporation (NNAC) and First Peoples of the River Murray Mallee Region (FPRMMR#2) respectively. • Implementing avoidance areas around known areas of cultural heritage value and formalizing appropriate exclusion zones around both known and potential sites of cultural significance as part of the CHMP. • Consulting with the Ngadjuri Nation Aboriginal Corporation (NNAC) and First Peoples of the River Murray Mallee Region	Pre-construction Construction	CEMP **Section 8.2**

Commitment	Timing	If applicable, where is this addressed in the CEMP?
(FPRMMR#2) to mitigate against inadvertently impacting an ethnographic site. • Ensuring all personnel involved with ground disturbing activities attend a legislative and cultural awareness session developed in consultation with the respective Traditional Owners and approved by AAR, prior to taking part in those activities. • Ensuring personnel involved in the project are appropriately qualified and inducted. • Engaging heritage monitors during ground-disturbing works and micro-siting to avoid any identified sites. • In the event of identifying sites of Aboriginal heritage during project works, engaging a suitably qualified archaeologist or heritage consultant, in consultation with the Traditional Owners, to develop an appropriate methodology for the management or relocation of the heritage. This will be consistent with: ○ AAR's Aboriginal Heritage Discovery Protocols ○ AAR's Heritage Impact Procedures; and ○ the CHMP. Any salvage or relocation of heritage will be conducted in compliance with the Aboriginal Heritage Act (AGA) and any conditions set by the Minister under the AHA authorization process.		
Traffic To ensure traffic impacts are appropriately managed, Neoen commits to entering into detailed agreements with Goder Regional Council and the Department for Infrastructure and Transport and will do so promptly and in good faith. A dedicated Traffic Management Plan (TMP) (sub-plan) will be developed for the Project prior to construction. Further measures to increase traffic safety include: • road upgrades • structural engineer advice for load-bearing capacities of bridge infrastructure • townships will be bypassed by heavy vehicles • TMP recognises school bus routes • TMP recognises Heysen Trail walkers	Pre-construction Construction Operation Decommissioning	Not applicable. Addressed in site specific Traffic Management Plan (sub-plan)

5.4 Further Approvals, Permits and Licensing

Various further approvals, permits and licencing (in addition to the conditions set out in the EPBC Act and NV Act approvals) will be required for GNWF. A summary of these requirements is provided in **Table 5.6** as a register that will be maintained by the HSE Manager and reviewed before construction and at regular intervals during construction.

Placeholder: to be completed when approval documentation is received.

Table 5.6 Approvals, permits and licencing required for GNWF

Legislation / Conditions	Requirement	Details	Expectations	Contractors Response	Responsible Organisation
PRE-CONSTRUCTION					
CONSTRUCTION					
PRIOR TO COMMISSIONING					
OTHER					

6.0 Roles and Responsibilities

Both Neoen and Contractor will have roles in implementing the requirements of the CEMP. In Situations of compliance and some areas of technical monitoring, qualified consultants (sub-contractors) should be engaged.

6.1 Contractors Organisation and Structure

The EPC Contractors organisation and structure chart will be detailed here once finalised. A typical organisational chart is provided in **Figure 6.1** below, however a tailored chart will be developed and updated within the CEMP once the contractor has been awarded, and final organisational structure established and agreed.

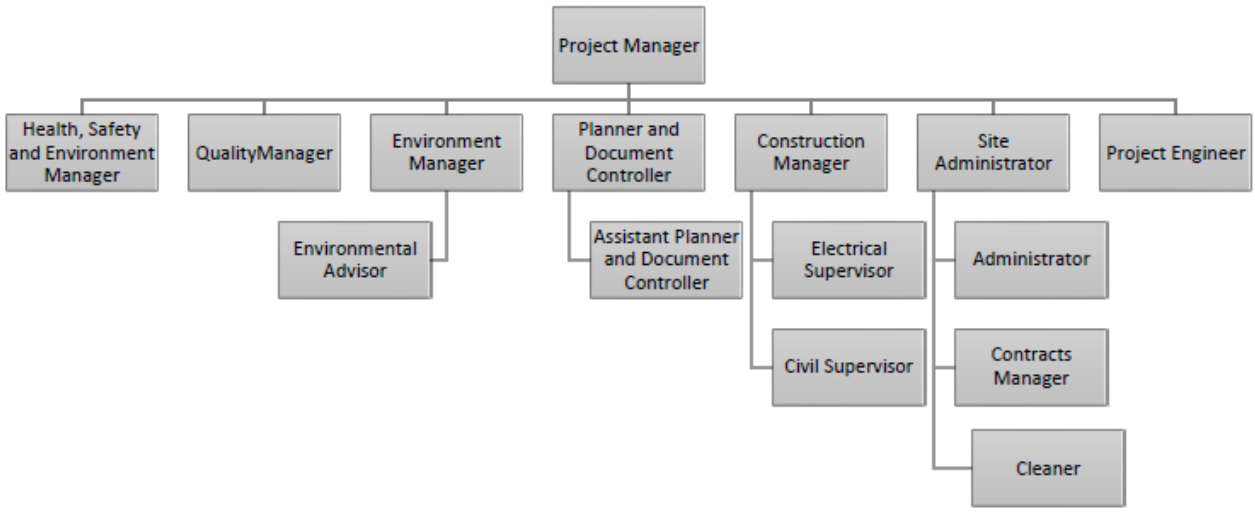


Figure 6.1 Example Organisational Chart to be Updated Once Contractor Finalised

6.2 Organisational Roles and Responsibilities

Currently Neoen is the project developer and is responsible for the planning of the entire GNWF Project, including seeking and obtaining relevant planning and environmental approvals under State and Federal legislation, as well as construction and operation of the Project.

The EPC Contractor is constructing GNWF Project and is responsible for implementing the CEMP, and sub-plans. As such, the EPC Contractor will also be responsible for implementing this Plan during construction, including the management measures associated with construction works.

The typical roles and responsibilities of the key personnel for the Project, are outlined in **Table 6.1** for Neoen, and **Table 6.2** for the Contractor, to be finalised upon contractor award.

Table 6.1 Neoen Roles and Responsibilities

Role	Responsibility
Neoen Representative / Neoen Environment Representative	• Be the key contact and environmental representative of Neoen. • Ensure that contractual documents include environmental responsibilities. • Direct the contractor to review and further develop the CEMP and associated sub-plans and ensure that these are approved by the relevant authority prior to construction commencing. • Ensure that all relevant approvals / permits / licenses allocated to Neoen are obtained prior to works commencing. • Take overall responsibility for ensuring the project meets its compliance obligations and environmental requirements are implemented. • Agree to procedures for emergency response. • Agree to frequency and method of environmental auditing, monitoring and other matters which are to be reported to Neoen.
Community Liaison Officer	• Liaise with the construction management team to ensure timely and effective engagement with the local community on construction activities. • Communicate through the website, newsletters, advertising and community meetings as required. • Be point of contact for public feedback and complaints, including detailed collection of relevant information and transfer of information to Environment Manager to investigate.
Ecological Consultant (sub-contractor) engaged by Neoen	• It is proposed that a suitably qualified and experienced Ecological Consultant (Contractor) will be responsible for assisting the Construction Project Manager / Asset Manager (Neoen) in implementing this Plan. • The same Ecological Consultant (Contractor) is likely to be required to undertake monitoring and reporting activities and likely to be responsible for reviewing and analysing monitoring data and results to determine the success (or failure) of management actions and recommending refinement/improvement, if required.

Table 6.2 EPC Contractor Roles and Responsibilities

Role	Responsibility
Project Director	• Provide leadership to the Project Manager and the broader project team in relation to environmental management on site. • Manage environmental risks to avoid environmental harm and reputational damage. • Liaise with stakeholders and project managers to report on Project status in relation to environmental management.
Project Manager	• Ensure the Project is designed in accordance with the requirements of the Development Approvals as documented in the CEMP and supporting documentation. • Ensure that works are carried out in accordance with the requirements of the CEMP and supporting documentation, including the implementation of all environmental controls. • Provide leadership regarding environmental management on site. • Ensure sufficient personnel, equipment and other resources to achieve Project environmental objectives and targets. • Ensure that sub-contractors implement appropriate (and consistent) environmental management practices during construction across all levels of the Project. • Ensure that the requirements of this CEMP are included in any commercial agreements or subcontracts with subcontractors. • Review and approve the CEMP (on behalf of the EPC Contractor) and key Project environmental documents.

Role	Responsibility
Project Engineer	• Ensure the Project is designed in accordance with the requirements of the Development Approvals as documented in the CEMP and supporting documentation. • Identify environmental risks associated with the design and report to Construction Manager. • Review the design in the field, in relation to the environmental context of the site, to avoid impacts and oversee any micro-siting works. Advise the Project Manager and Construction Manager of any recommended changes. • Effectively communicate any design updates to Neoen and Managers and ensure that spatial data is updated and shared. • Provide input into the preparation of environmental planning documents as required.
Construction Manager	• Ensure all employees and contractors have appropriate training and adequate understanding of the environmental requirements associated with their work activities. • Oversee and direct construction from conception to completion. • Ensure that construction works are carried out in accordance with the requirements of the CEMP and supporting documentation, including the implementation of all environmental controls. • Work with the Environmental Manager / Advisor and provide leadership regarding environmental management on site. • Ensure resources are available on site to implement the CEMP, and complete required reporting.
Environmental Manager / Advisor	• Assist the Construction Manager to ensure the CEMP requirements are met in all construction activities. • Acquire Project approvals, permits and licenses as required. • Develop an audit and inspection schedule relevant to this CEMP and ensure that it is implemented accordingly. • Provide environmental inductions / training to all contractors or employees. • Have the authority to stop works to avoid unapproved environmental impacts. • Notify relevant authorities of any environmental incident after following consultation and approval from Neoen. • Implement any required corrective actions (after receiving approval from Neoen).
Health Safety and Environment (HSE) Officer	• Undertake audits/inspections according to the audit schedule to ensure compliance with the CEMP, legal requirements and/or Project-specific objectives and/or targets. • Ensure required environmental monitoring is undertaken according to monitoring schedule. • Investigate and report environmental incidents as required (if any).
Construction Supervisor	• Ensure construction works are carried out in accordance with this CEMP and relevant environmental procedures. • Assist Construction Manager and Environmental Manager / Advisor to implement this CEMP on site.
Sub-contractors	• Comply with all legal and contractual requirements, including the Conditions of the Development Approval, EPBC Approval, Native Vegetation Clearance Approval and Construction Contract. • Undertake work in accordance with contract specifications, which are to include the requirements of this CEMP. • Undertake inductions, training and pre-start meetings as directed. • Sub-contractors undertaking works that are beyond the scope of this CEMP are required to submit an Environmental Work Method Statement (or similar) to the EPC Contractor Project Manager (or delegate) for approval prior to commencing works.

Role	Responsibility
	• Collect and provide monthly environmental monitoring data to the environmental manager as directed. • Comply with, implement, inspect and maintain environmental controls as directed. • Report environmental incidents and / or compliance issues to their immediate contract supervisor.
All personnel	• Conduct works in compliance with the CEMP and all sub plans. • Stop works if unsure or uncertain about environmental requirements and seek advice from supervisor / management. • Understand and implement (if required) the Chance Find Procedure (or similar) if previously unknown environmental or cultural heritage sites are encountered during construction. • Follow reasonable directions given by the Construction Manager and / or Environmental Manager / Advisor and Neoen. • Report any activity that has resulted in, or the potential to result in an environmental incident immediately to the Project Manager and Environmental Manager / Advisor.

7.0 Risk Assessment

7.1 Impact Risk Assessment Methodology

The potential impacts involved with construction of the Project, are outlined in the following sections for each relevant environmental aspect. The primary objective for management of each aspect is included, along with broad management measures for the design and construction phases of the Project to minimise potential adverse impacts.

For each environmental aspect, each potential impact has been numbered and given a rating in terms of likelihood (**Table 7.1**) and consequence (**Table 7.2**), which are then combined to generate a risk rating (**Table 7.3**), associated with likely management actions (**Table 7.4**). The likelihood and consequence ratings have been assessed prior to consideration of any control measures.

Table 7.1 Likelihood of Risk Occuring

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

Table 7.2 Consequence of Risk Rating

Consequence	Description
Insignificant	Minor incident of environmental damage that can be reversed
Minor	Isolated but substantial instances of environmental damage that could be reversed with intensive efforts
Moderate	Substantial instances of environmental damage that could be reversed with intensive efforts
Major	Major loss of environmental amenity and real danger of continuing, with regulatory concerns.
Severe	Severe widespread loss of environmental attribute and irreversible environmental harm

Table 7.3 Risk Assessment Matrix

Consequence Likelihood ↓	Insignificant (no impact)	Minor (low impact, localised)	Moderate (manageable, some environmental harm)	Major (significant damage, regulatory concerns)	Severe (catastrophic impact, irreversible harm)
Rare (highly unlikely)	Low	Low	Low	Medium	High
Unlikely (could happen, but not likely)	Low	Low	Medium	High	High

Consequence Likelihood ↓	Insignificant (no impact)	Minor (low impact, localised)	Moderate (manageable, some environmental harm)	Major (significant damage, regulatory concerns)	Severe (catastrophic impact, irreversible harm)
Possible (might occur at some point)	Low	Medium	Medium	High	Extreme
Likely (expected to occur)	Medium	Medium	High	High	Extreme
Almost certain (occurs frequently)	Medium	High	High	Extreme	Extreme

Table 7.4 Management Actions Required for Each Risk Rating

Risk Rating	Management Actions Required
Low	Acceptable risk level with infrequent review. Standard control and monitoring measures to be identified and implemented. Monitor and review locally as necessary. Report to local manager(s).
Medium	Acceptable risk level but must be reviewed regularly. Specific control and monitoring measures to be identified and implemented. Measures and risk level to be reviewed and improved as further information becomes available.
High	Undesirable risk level – consultation with manager(s) prior to activity. Specific control and monitoring measures to be identified and implemented. Measures and risk level to be reviewed and improved as further information becomes available.
Extreme	Unacceptable risk level. Do not proceed with activity. Requires immediate attention and consideration. Detailed risk assessment and management plan to be prepared by relevant senior manager(s) or suitably qualified consultant. Strict control and monitoring measures to be identified and implemented. Any action that has, will have, or is likely to have a significant impact on matters of national environmental significance requires referral under the EPBC Act.

Implementation of specific construction management measures for each identified risk, is expected to avoid and/or minimise the potential impacts and as such, reduce the risk rating. Therefore, a residual risk rating is also provided, as is the risk after implementation of control measures. The types of construction management measures are divided into five categories based on the Standard Hierarchy of Controls, described in **Table 7.5.** For each management measure, the table also identifies the location, timing, frequency and person responsible for ensuring the action is implemented.

The person or position responsible is indicative only, and the position title or responsibility may change depending on the specific EPC contractor. These tables should be updated to reflect the specific EPC Contractor positions and responsibilities.

Table 7.5 Description of the Types of Construction Management Measures as they relate to the Standard Hierarchy of Controls

Type	Description
Elimination	Physical removal of the hazard. Most elimination measures have been undertaken in the planning and design phase of the project to avoid impacts to environmental aspects.
Substitution	Replace the hazard with something likely to be less hazardous to the environment, such as using low impact methods of construction; use of targeted herbicides for weed control; and planning of stockpile areas to reduce hazard potential.
Engineering	Measures to avoid environmental harm, such as erosion control, dust suppression, and waste management protocols, to isolate the environmental aspect from the hazard.
Administrative	Measures that change the way work is done to reduce environmental harm, such as through training programs for workers on environmental policies, best practices, and the importance of compliance; monitoring, inspection and audits to assess effectiveness of controls; reporting and emergency response procedures; spatial data systems.
Personal Protective Equipment (PPE)	Protect the worker (or environmental aspect) with PPE.

Several additional sub-plans are referred to where more detailed, specific management actions are required. Each of these sub-plans should be referred to as and when required for a complete understanding of the construction management measures required to be implemented to avoid and minimise environmental impacts during construction.

7.2 Risks to Implementation of CEMP

There are several potential risks to achieving this Plan's environmental objectives, including the following:

- Indifference and/or lack of understanding of requirement for this Plan (EPBC Act approval conditions) leading to poor implementation of this Plan.
- Change of wind farm owner and/or operator (potentially leading to poor implementation of this Plan).
- Change of staff responsible for implementation of this Plan (i.e., Construction Project Manager / Asset Manager (Neoen)) and lack of understanding of requirements within this Plan.
- Change of Ecological Consultancy assisting Neoen to implement this Plan and lack of understanding of requirements within this Plan.

These risks are outlined in **Table 7.1**, along with further commentary on each risk, the likelihood rating of each risk occurring, the consequence rating of each risk, the overall risk rating, risk management strategies and/or proposed contingency measures and who will be responsible for managing the risk. A qualitative risk assessment methodology was used to undertake the risk assessment, with the likelihood and consequence rating criteria, along with the corresponding risk rating matrix, provided in **Section 7.1**, above.

Table 7.6 Assessment of Risks to Achieving the CEMP's Environmental Objectives and Associated Risk Management Strategies that Will Be Applied.

Risk	Comment	Likelihood of Risk Occurring	Consequence Rating	Risk Rating	Risk Management Strategies / Proposed Contingencies	Responsibility
Indifference and/or lack of understanding of the requirements for this Plan (EPBC Act approval conditions) leading to poor implementation of this Plan, including the monitoring, analysis, adaptive management and reporting proposed within it.	Poor implementation of this Plan is likely to result in potential non-compliance with EPBC Act, NPW Act and other environmental approval conditions, which is undesirable for Neoen.	Unlikely – Possible	Minor - Moderate	Medium	Ensure this Plan addresses all the EPBC Act and NV Act approval conditions.	Poor implementation of this Plan is likely to result in potential non-compliance with the EPBC Act approval conditions, which is undesirable for Neoen.
Change of wind farm owner and/or operator (potentially leading to poor implementation of this Plan).	Neoen intends to own and operate the GNWF and advise that they are unlikely to sell GNWF.	Possible	Minor - Moderate	Medium	EPBC Act approval (and conditions).	Construction Project Manager / Asset Manager (Neoen) (assisted by Ecological Consultancy)
Change of staff responsible for implementation of this Plan (i.e., Construction Project Manager / Asset Manager (Neoen)) and lack of understanding of requirements within this Plan.	Given the expected duration of construction of the GNWF, it is likely that the Construction Project Manager / Asset Manager (Neoen) will change at times during implementation of this Plan.	Highly likely	Minor - Moderate	High	Construction Project Manager / Asset Manager (Neoen) to be inducted into this Plan.	Change of staff responsible for implementation of this Plan (i.e., Construction Project Manager / Asset Manager (Neoen)) and lack of understanding of requirements within this Plan.

Risk	Comment	Likelihood of Risk Occurring	Consequence Rating	Risk Rating	Risk Management Strategies / Proposed Contingencies	Responsibility
Change of ecological consultancy assisting Neoen to implement this Plan and lack of understanding of requirements within this Plan.	Given the expected duration of operation of the GNWF, it is possible that the ecological consultancy will change during implementation of this Plan.	Possible - Likely	Minor - Moderate	Medium	Neoen to ensure that they engage a suitably qualified and experienced Ecological Consultancy to assist with implementation of this Plan.	Change of Ecological Consultancy assisting Neoen to implement this Plan and lack of understanding of requirements within this Plan.

8.0 Construction Management Measures

8.1 Air Quality Management Measures

Large scale construction projects are likely to have significant impacts on air quality if appropriate management measures are not implemented. Demolition of existing development, broadscale removal of vegetation cover, road construction, landscaping works, drainage construction, vehicle movements, soil stockpiling and other construction related activities may leave soil surfaces exposed and lead to excessing airborne dust and/or dust deposition onto vegetation and other surrounding environments, both natural and built. Construction vehicles and heavy machinery are likely to have an impact on the local environment through temporarily increased exhaust emissions. A range of measures can be implemented to reduce the harmful impacts of exhaust and dust emissions, which otherwise may cause health impacts to those living or working near the site, and the broader natural environment (**Table 8.1**).

Table 8.1 Air Quality Management Measures during Construction

Air Quality Management	
Reference Documents	• Environment protection (Air Quality) Policy 2016 (under Section 28 of the *Environment Protection Act 1993*) (SA). • National Environment Protection Measure for Ambient Air (Ambient Air NEPM) (Cth). • Evaluation distances for effective air quality and noise management (Environment Protection Authority, 2023). • Air Quality Management Plan / dust suppression procedure (developed by Contractor) t
Objective(s)	Maintain air quality and minimise emissions to preserve the local environment and protect health of workers and nearby communities.
Target(s)	• No complaints raised by stakeholders regarding dust emissions or air quality as a result of Project activities. • Minimise medium- and long-term storage of soil and establish stockpiles in areas that are comparatively protected and in accordance with best practice principles for dust management.
Trigger for review of management measures and specific corrective action	• Complaint received regarding dust or air quality. • Excessive dust observed at construction site

Air Quality Management						
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
1.1	Exhaust emissions from site equipment and vehicles	Construction	Likely	Moderate	Medium	Low
1.2	Dust emissions from site activities (e.g. construction of access tracks and hardstand areas) causing dust nuisance, human health impacts or impacts to vegetation.	Construction	Likely	Moderate	Medium	Low
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
1.1	**Exhaust emissions**					
	Conduct training for drivers to promote awareness about the financial and environmental impact of idling.	Administrative	Project Area	During construction	Ongoing	HSE Manager
	Vehicle engines to be switched off when not in use.	Administrative	Project Area	During construction	Ongoing	HSE Manager
	Avoid idling vehicles where possible. Implement appropriate on-site policies around idle time thresholds.	Administrative	Project Area	During construction	Ongoing	HSE Manager
	Where possible, utilise vehicles and equipment with low emissions (including hybrid vehicles).	Substitution	Project Area	During construction	Ongoing	HSE Manager
	Maintain regular servicing of machinery to ensure optimal fuel efficiency.	Engineering	NA	During construction	Regular	Site Supervisor
	Implement shared transport option for workers traveling to site from worker accommodation.	Administrative		During construction	Ongoing	Site Supervisor
1.2	**Dust emissions**					
	Limit vegetation clearing to the minimum required for construction works and safety and retain as much vegetation as possible. Do not clear to maximum approved extent if not required for safe and effective construction.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	HSE Manager

Air Quality Management						
	Limit bare earth exposure to the minimum possible and use vegetation cover, mulch covers or other suitable methods where possible.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	HSE Manager
	Minimise the height of stockpiles and avoid placing stockpiles in high wind areas (on the top of hills). Where practicable, ensure stockpiles are not upwind of the typically prevailing wind direction (south west) relative to sensitive ecological receptors such as Mokota CP.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Maintain stockpiles, for example stripped topsoil, in a condition which prevents windblown dust generation, especially during dry or windy conditions. This will include watering or covering stockpiles with an appropriate erosion and sediment control solution.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Ensure vehicle loads that contain material likely to generate dust are covered.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Avoid activities that are likely to generate large amounts of dust, such as earthworks and loading soil and/or gravel materials into trucks, during high wind conditions, where possible.	Administrative	Disturbance Footprint.	During high wind conditions.	As required.	Site Supervisor
	Minimise wheel-generated dust by watering roadways, imposing speed restrictions and applying biodegradable emulsion binders to the road surface, particularly focusing on high use roads such as the main site access routes. Additional scrutiny for dust control will occur using emulsion binders and watering along the 3 km extents that are adjacent to Mokota Conservation Park, including White Hill Road and Gum Hill Road.	Engineering	Project Area	During construction	Ongoing	Site Supervisor

Air Quality Management						
	Enforce a maximum speed limit of 40 km/hr on sealed and unsealed access tracks, and 10 km/hr where access tracks are in construction and past landowner dwellings, and stationary work crew, where practicable. Ensure maximum speed limits are signposted and monitored for compliance.	Administrative	Project Area	During construction.	Ongoing.	Site Supervisor
	Use a water cart to spray access tracks, stockpiles and any other exposed soils.	Engineering	Disturbance Footprint.	During construction.	As required.	Site Supervisor
	Rehabilitate (revegetate) or allow natural regeneration of bare soil as soon as the area is no longer needed for construction (i.e. temporary clearance areas).	Engineering	Disturbance Footprint.	As soon as the area is no longer needed for construction.	Ongoing.	Site Supervisor
	If dust presents a problem elsewhere, commence regular air quality monitoring around the site to ensure that it is in accordance with relevant standards. Include appropriate dust monitoring within site management practices, to inform site management of the success of dust control measures.	Administrative	Project Area	During construction	Ongoing	HSE Manager
	Comply with specific measures to address air quality which will be provided in a separate Air Quality Management Plan or procedure (sub-plan) by the Contractor.	NA	Project Area	During construction	TBC	TBC
	Comply with specific measures detailed in INTG Management Plan (Umwelt, 2025) to address specific measures related to INTG.	NA	Project Area	During construction	Ongoing	HSE Manager

8.2 Heritage Management Measures

The Project Area has a long history of utilisation by peoples of the Ngadjuri Nation and First People of the River Murray and Mallee Region. The large area of privatised land means that previously known sites of important cultural heritage may have been lost over time, leading to the potential for these sites to be rediscovered during ground disturbing works such as construction of a wind farm. Cultural heritage sites may include ancestral burial sites, archaeological sites, historic buildings and landscapes of cultural significance. A comprehensive Cultural Heritage Management Plan is currently being developed in consultation with the NNAC and FPRMMR#2 required as a sub-plan to this CEMP to adequately address mitigation and management measures required to prevent unauthorised impacts to cultural heritage that will also include commitments and conditions as part of the AAR Section 21/23 authorisation. This Management Plan will also outline Site Discovery Procedures that align with AAR's Aboriginal Heritage Discovery Protocols and Heritage Impact Procedures.

There is also potential for Historic Heritage in the Project Area, such as foundations, bricks or walls of heritage value. If Historic Heritage is found in dedicated surveys scheduled to occur prior to construction, then a Management Plan will also be developed for this to ensure no impacts during Construction (**Table 8.2**). This Management Plan will detail and avoidance areas and will include a Historic Heritage Site Discovery Procedure for heritage finds during construction.

Table 8.2 Heritage Management Measures during Construction

Cultural Heritage Management	
Reference Documents	• *Native Title Act 1993* (Cth). • *Aboriginal Heritage Act 1988* (amended 2016) (SA). • *Heritage Places Act 1993* (SA). • Discovery of Aboriginal Sites and Objects (Fact Sheet – DPC-AAR 2021). • Historic Heritage Site Discovery Procedure. • AAR's Aboriginal Heritage Discovery Protocols and Heritage Impact Procedures. • Aboriginal Sites, Objects and Ancestral Remains Discovery Procedure EMTH Attachment 2A (Department for Infrastructure and Transport, 2021a). • Managing Aboriginal Heritage in South Australia (Attorney-General's Department, 2025). • Local Heritage Agreement: Guideline 3 (Department of the Premier and Cabinet, Undated). • Heritage Places Act Archaeological Guidelines 2022. • *Planning, Development and Infrastructure Act 2016*.

Cultural Heritage Management						
	• Section 21/23 authorization for GNWF from AAR. • Ethnographic survey and archaeological survey reports conducted with both NNAC and FPRMMR. • Site Discovery Procedure for Heritage Finds.					
Objectives	• All areas mapped as high heritage potential within the proposed Disturbance Footprint have been surveyed for heritage values in advance of construction. • No unauthorised impacts or disturbance to known sites of heritage significance. This includes Ngadjuri Heritage, First People of the River Murray and Mallee Region Heritage and European Heritage.					
Targets	• No direct impacts to known heritage sites. • Any potential cultural heritage material finds are managed in accordance with both the conditions prescribed under the Section 21/23 authorization as well las the procedures outlined in the Cultural Heritage Management Plan, the Historic Heritage Management Plan (if deemed to be necessary), Historic Heritage Site Discovery Procedure, AAR's Aboriginal Heritage Discovery Protocols and Heritage Impact Procedures and Chance Find / Stop Work Procedure as applicable. • Traditional Owner representatives will be consulted as required during construction. • All personnel involved in the Project will be required to attend a project induction that includes a Cultural Heritage component and briefing on the Discovery / Chance Find Procedure.					
Trigger for review of management measures and specific corrective action	• Discovery of new information (i.e. Chance Find). • Regulatory changes.					
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
2.1	**Disturbance of sites or items of cultural heritage**	**Construction**	**Possible**	**Major**	**High**	**Medium**
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
2.1	**Disturbance to matters of Cultural Significance**					
	All proposed ground disturbance areas will be subject to both cultural heritage and European heritage surveys in advance of ground disturbance.	Administrative	Development Envelope	Prior to construction commencing	Once	Neoen

Cultural Heritage Management						
	Ensure all approvals / authorisations under the *Aboriginal Heritage Act 1988* have been obtained prior to construction commencing.	Administrative	NA	Prior to construction commencing	Once	Neoen / Project Manager
	Undertake construction in accordance with the conditions prescribed in the AAR Section 21/23 authorization and the respective NNAC and FPRMMR#2 Cultural Heritage Management Plans.	NA	Project Area	During construction	Ongoing	All personnel
	If items of potential cultural heritage significance are discovered during construction, a 'Stop Work' procedure should be in place outlined within the Historic Heritage Site Discovery Protocol and AAR's Aboriginal Heritage Discovery Protocols, requiring work to cease immediately in the vicinity of the construction works and a heritage professional is to be invited to investigate prior to works recommencing in that area. Any potential discoveries are to be managed according to the Projects' Historic Heritage Site Discovery Procedure, AAR's Aboriginal Heritage Discovery Protocols and Heritage Impact Procedures, and/or the Chance Finds Procedure.	Administrative	Disturbance Footprint	During construction	As required	All personnel
	Implement a reporting and investigation system for the work site.	Administrative	Site Offices	During construction	As required	Project Manager / Site Supervisor

8.3 Fauna Management Measures

Construction activities have the potential to impact local fauna, which are protected under the NPW Act and / or EPBC Act. Impacts include habitat destruction, disturbance caused by increased noise and activity, and direct harm from construction machinery. A comprehensive Fauna Management Plan is required to mitigate potential impacts to native fauna. The following section outlines the broad measures to protect and manage fauna and protect biodiversity during construction (**Table 8.3**). Additional specific management plans for threatened fauna species are provided separately and provide more detail on species specific mitigation measures.

Table 8.3 Fauna Management Measures during Construction

Fauna Management	
Reference Documents	• *Environment Protection and Biodiversity Conservation Act 1999* (Cth). • *National Parks and Wildlife Act 1972* (SA). • *National Parks and Wildlife Act Regulations 2019* (SA). • Pygmy Blue-tongue Lizard Management Plan (Umwelt, 2025 - in Draft). • Fauna Impact Assessment Guidelines EHTM Attachment 5A (Department for Infrastucture and Transport, 2021). • Living with Wombats: Southern Hairy-nosed Wombats in the South Australian Murray-Darling Basin (SA MBD, 2011).
Objectives	• No direct impacts to listed vertebrate fauna. • Ensure the total area of habitat clearing does not exceed approved clearance area. • Minimise direct and indirect impacts to native fauna.
Targets	• No incidents of unauthorised clearing. • No incidents of clearing prior to pre-clearance surveys being undertaken in threatened fauna habitat. • No incidents of trapped or injured fauna as a result of Project Activities.
Trigger for review of management measures and specific corrective action	• Unauthorised clearing. • Clearing prior to pre-clearance survey being undertaken in threatened fauna habitat. • Trapped or injured fauna observed.

Fauna Management						
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
3.1	Mortality of native fauna through clearance of vegetation	Construction	Almost certain	Major	Extreme	High
3.2	Mortality of native fauna through construction activities (vehicle strike, entrapment etc.).	Construction	Likely	Minor	Medium	Low
3.3	Disruption to, and potential mortality of Southern Hairy-nosed Wombats (*Lasiorhinus latifrons*)	Construction	Likely	Major	High	Medium
3.4	Avoidance displacement of native fauna	Construction	Almost certain	Minor	High	Medium
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
3.1	**Mortality of native fauna through clearance of vegetation**					
	PCC is undertaken by suitably qualified ecologists in all locations, prior to undertaking any vegetation disturbing works. PCC is undertaken in accordance with **Section 4.2.4** and any associated sub-plans, such as PBTL MP (Umwelt, 2025).	Administrative	Disturbance Footprint	Prior to construction	Ongoing, as required.	Site supervisor, HSE Manager, Ecological Consultant
	Micro-site within Development Envelope to final location of infrastructure where it minimises impact on identified fauna (including PBTL and others). Specifically, apply micro-siting, where technically feasible to: • Avoid areas containing known individuals and populations of PBTL (see PBTL MP). • Avoid or minimise felling of wooded areas. • Avoid or minimise felling of hollow-bearing trees.	Administrative	Development Envelope and Disturbance Footprint	During construction	Ongoing	Project Engineer / HSE Manager
	PBTL MP (Umwelt, 2025 - in Draft) referred to for any management measures specific to nationally Endangered species (i.e. relocation of PBTL).	Administrative	Development Envelope	During construction	Ongoing	HSE Manager

Fauna Management						
	Fauna spotter catchers (with qualifications and appropriate permitting) will be present at all times during clearing of native vegetation, to perform pre-construction checks to remove fauna directly from construction path (including checking of unavoidable felled hollow trees and logs).	Administrative	Disturbance Footprint	During construction	Ongoing	HSE Manager
	In wooded areas, hollow bearing trees will be avoided where practicable. If avoidance is not practicable, hollow bearing trees will be slow-felled to minimise the chances of injury or death and will be inspected after felling by a qualified fauna spotter-catcher to confirm no injured wildlife are present. Felled hollows will be relocated to adjacent areas to retain habitat features, so long as the relocation does not cause unnecessary disturbance.	Administrative	Development Envelope	During construction	As required	Site Supervisor, Construction workers, HSE Manager
	Avoid disturbing, removing or breaking up fallen timber or other habitat features (including stones and boulders) where possible.	Administrative	Development Envelope	During construction	As required	Site Supervisor, HSE Manager
	Micro-site to avoid or minimise felling of wooded areas.	Administrative	Disturbance Footprint	During construction	As required	Project Engineer, HSE Manager
3.2	**Mortality of native fauna through construction activities (vehicle strike, entrapment)**					
	Movement within the Project Area will be via approved access tracks with speed limits enforced. The requirement to enter and traverse the Project Area will be minimised and limited to those required for essential Project activities.	Administrative	Project Area	During construction	Ongoing	All personnel
	Speed limits clearly signed and enforced on roads during construction (40 km/ hr maximum).	Administrative	Project Area	During construction	Ongoing	Project Manager / Site Supervisor
	Where native fauna is encountered, all site personnel and contractors shall keep sufficient distance to not disturb them and will not cause harm or attempt to trap them.	Administrative	Project Area	During Construction	Ongoing, as required	Site Supervisor/ HSE Manager

Fauna Management						
	Where injured fauna is encountered, the Fauna Rescue of South Australia helpline ((08) 8289 0896; 1300 562 527) will be contacted immediately, and the Site Supervisor notified.					
	Implement reporting system for any fauna injury or death during construction. Apply adaptive management to controls if high risk areas are identified.	Administrative	Project Area	During construction	Ongoing	Site Supervisor / HSE Manager
	Open sections of trench or cable pits to be checked twice daily when being worked on, with any trapped fauna to be reported and removed by qualified fauna spotter-catcher as soon as possible (within 24 hrs). For pits or excavations that remain open for longer periods of time (i.e. over 24 hours) an appropriate egress will be constructed at both ends to allow animals to escape the pit.	Administrative	Disturbance Footprint	During construction	Ongoing	HSE Manager
3.3	**Disruption to and potential mortality of Southern Hairy-nosed Wombats (*Lasiorhinus latifrons*)**					
	Refer to specific Southern Hairy-nosed Wombat Management Plan with will be developed for the Project. Specific permits may be required to disturb any wombats or wombat burrows in the Project Area during construction.	NA	Project Area	During construction	Ongoing	Site Supervisor / HSE Manager
3.4	**Avoidance displacement of native fauna**					
	Avoid or limit the use of bright artificial lighting that disrupts nocturnal species during nighttime works, if required.	Administrative	Disturbance Footprint	During construction	Ongoing	Site Supervisor / HSE Manager
	Reduce construction timeframes where possible to limit the duration of impact on fauna species. Alternatively, schedule efficient construction timeframes to avoid prolonged impact in any one location, particularly in wooded areas which are likely to support a higher abundance of native fauna.	Administrative	Disturbance Footprint	Schedule prior to commencing works and during construction	Once, ongoing	Site Supervisor / HSE Manager

Fauna Management						
	Other - general					
	Apply adaptive management approach (i.e. reassess management actions if required) to prevent or minimise further losses or injuries of fauna if existing management measures are found to be ineffective.	Administrative	NA	During construction	Ongoing, as required.	Site Supervisor /HSE Manager
	Refer to specific Fauna (and Flora) Management Plan for specific measures related to Fauna.	NA				

8.4 Flora and Vegetation Management Measures

Development of the Project is proposed to impact up to 453.87 ha of native vegetation, and an additional ~83 ha of non-native vegetation or cleared areas. Native vegetation is protected under the Native Vegetation Act, with individual threatened species protected under the NPW Act and / or EPBC Act. Impacts include direct clearance of vegetation to facilitate the construction of the Project, and indirect impacts associated with inappropriate management. The actions listed in this CEMP (and associated sub-plans) aims to minimise the likelihood of unauthorised clearance of native vegetation and indirect impacts to native vegetation, including threatened species and threatened ecological communities. A comprehensive Vegetation Management Plan is required to mitigate potential impacts to native vegetation, in addition to specific INTG MP. The following section outlines the broad measures to protect and manage fauna and protect biodiversity during construction (**Table 8.4**). Additional specific management plans for threatened fauna species are provided separately and provide more detail on species specific mitigation measures.

Table 8.4 Flora and Vegetation Management Measures during Construction

Flora and Vegetation Management	
Reference Documents	• *Environment Protection and Biodiversity Conservation Act 1999* (Cth). • *Biosecurity Act 2015* (Cth). • *Landscape South Australian Act 2019* (SA). • *Landscape South Australia Regulations 2020* (SA). • *National Parks and Wildlife Act 1972 (*SA). • *National Parks and Wildlife Act Regulations 2019* (SA). • *Native Vegetation Act 1991* (SA). • *Native Vegetation Regulations 2017* (SA).

Objectives	• Ensure the total area of vegetation clearing does not exceed the approved clearance area (453.87 ha).
	• No direct or indirect impacts to known individuals or populations of EPBC listed threatened flora species (*Acacia spilleriana* and *Dodonaea procumbens*).
	• Ensure the total area of vegetation clearance for areas mapped as EPBC listed TEC's does not exceed the approved area for:
	  ○ Iron-grass Natural Temperate Grassland, no more than 8.59 ha of INTG (all condition classes) and no more than 6.14 ha of Class B INTG.
	  ○ Mallee Bird Community of the Murray Darling Depression Bioregion, no more than 0.76 ha.

Targets	• No incidents of unauthorised clearing.

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	• Microsite during construction to further minimise impact to high quality habitats including TECs. • No direct or indirect unauthorised impact to any listed threatened flora species or TECs. • Areas of temporary clearance rehabilitated (spreading of topsoil and scarification) and demonstrating signs of recovery within three years of rehabilitation commencing. • No reduction in vegetation condition caused by altered hydrology or sedimentation and runoff.					
Trigger for review of management measures and specific corrective action	• Unauthorised clearing. • Micro-siting not undertaken where required. • Unauthorised direct or indirect impact to any listed threatened flora species or TEC. • Areas of temporary clearance remain exposed and un-rehabilitated and/or not showing signs of regeneration within 36 months of final impact. • Runoff channels / sedimentation in unapproved clearance area observed.					
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
4.1	Direct loss of native vegetation within Disturbance Footprint	Construction	Almost certain	Major	Extreme	Extreme
4.2	Direct loss of native vegetation outside the approved clearance area	Construction	Possible	Major	Extreme	High
4.3	Degradation of native vegetation through: • Altered hydrology (due to altering of drainage lines through excessive runoff). • Sedimentation from construction run-off (soil). • Introduction of new weeds and / or pathogens or increase in weeds through use of contaminated construction material, machinery and vehicles.	Construction	Possible	Moderate	Medium	Low
4.4	Altered hydrology (due to altering drainage lines through excessive runoff) impacting vegetation composition and quality	Construction	Possible	Moderate	Medium	Low
4.5	Altered grazing regimes (increased grazing, preferential grazing, reduction or loss of grazing, altered grazing times)	Construction	Likely	Moderate	Medium	Low
4.6	Vehicles and/or machinery driving on INTG TEC outside of approved clearance areas and tracks	Construction	Possible	Minor	Medium	Low
4.7	Direct loss of EPBC listed TEC within Disturbance Footprint	Construction	Almost certain	Major	Extreme	Extreme

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4.8	Clearance of EPBC listed TEC outside of the approved clearance area	Construction	Possible	Major	Extreme	High
4.9	Indirect impact to EPBC listed threatened flora species within Development Envelope (through dust emissions and/or altered hydrology)	Construction	Possible	Minor	Medium	Low
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
4.1	**Direct loss of native vegetation within Disturbance Footprint**					
	PCC is undertaken by suitably qualified ecologists in all locations, prior to undertaking any vegetation disturbing works. PCC is undertaken in accordance with **Section 4.2.4** and any associated sub-plans, such as INTG MP (Umwelt, 2025).	Administrative	Disturbance Footprint	Prior to construction	Ongoing, as required	Site supervisor, HSE Manager, Ecological Consultant
	Apply the mitigation hierarchy principles on-ground throughout construction process to ensure that the final Disturbance Footprint is optimised to reduce impacts to native vegetation.	Administrative	During construction	Prior to commencing any stage of construction	Once (ongoing)	Project Engineer / HSE Manager
4.2	**Direct loss of native vegetation outside the approved clearance area**					
	Provide clear maps and spatial data indicating approved Disturbance Footprints for all infrastructure including tracks, approved turnaround areas, car parks, equipment laydown areas and materials storage areas. Approved DF and native vegetation are mapped in **Figure 9.1** and **Figure 9.2.**	Administrative	Provide to those involved in earthworks.	Prior to commencing any work on site.	Once (ongoing).	Site Supervisor / HSE Manager
	Site preparation to include demarcation of areas to be cleared (i.e. Disturbance Footprint) , as well as no-go zones to avoid inadvertent clearing of sensitive areas (described further below).	Administrative	Disturbance Footprint	Prior to commencing any work on site	Ongoing	Site Supervisor / HSE Manager
	Have a spatial data management system in place to clearly and promptly communicate and implement design changes to ensure that all works are in accordance with the latest design (i.e. to ensure micro-siting or other changes are communicated in a clear and timely manner).	Administrative	Site Office / between all staff involved in design/plannin	Prior to commencing any work on site.	Once (ongoing)	Site Supervisor / HSE Manager

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			g and earthworks			
	Communication to all parties of the approved Project Area boundary. Any requirement to move Disturbance Footprint outside of approved **Project Area** boundaries will require a variation to the EPBC Approval (and other approvals), and formal approval from the Minister.	Administrative	Site Office / All staff involved in design/planning and earthworks	Prior to commencing any work on site.	Once (regular reminders)	All staff involved in design/planning and earthworks
	Ensure that native vegetation clearance does not exceed the approved clearance area (261.31 ha of permanent clearance and 192.55 ha of temporary disturbance, totaling 453.87 ha of native vegetation).	Administrative	Disturbance Footprint	During construction	Ongoing (regular audits)	Construction Manager, Project Engineer, HSE Manager
4.3	**Degradation of native vegetation through:** • **Dust emissions smothering flora and suppressing photosynthesis** • **Altered hydrology (due to altering of drainage lines through excessive runoff)** • **Sedimentation from construction run-off (soil)** **Introduction of new weeds to the Project Area, or increase in weeds, through use of contaminated construction material, machinery and vehicles.**					
	See specific mitigation measures in: • **8.1** Air Quality Management Measures • **8.8** Soil Erosion, Drainage and Altered Hydrology Management Measures • **8.10** Weed and Pest Management Measures	NA	Project Area	Prior to and during construction	Ongoing	Site Supervisor / HSE Manager
4.4.	**Altered hydrology (due to altering drainage lines through excessive runoff) impacting vegetation composition and quality.**					
	Refer to altered hydrology measures in **Section 0**.	NA	Disturbance Footprint	During construction	Ongoing	Site Supervisor / HSE Manager
4.5	**Altered grazing regimes (increased grazing, preferential grazing, reduction or loss of grazing, altered grazing times)**					
	Reporting system in place to ensure that any substantial changes to the usual grazing regime and / or placement of watering points	Administrative	Project Area	Prior to and during construction	Ongoing, as required	Neoen / HSE Manager

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	required because of the construction of GNWF is communicated between landholder and construction contractor / Neoen.					
4.6	**Vehicles and/or machinery driving outside of approved clearance areas and tracks**					
	Apart from initial earthworks to construct access tracks and hardstand areas, ensure all vehicles and construction equipment always utilise dedicated access tracks and hardstands and do not travel outside of these areas.	Administrative	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
4.7	**Direct loss of EPBC listed Threatened Ecological Communities within Disturbance Footprint**					
	All staff and contractors will complete a detailed, site-specific induction which provides an overview of EPBC listed TECs, their specific location, and potential impacts, as well as management measures associated with their protection.	Administrative	Site office (or anywhere else suitable).	Prior to commencing any work on site.	Once.	Site Supervisor / HSE Manager
	Areas of TEC will be provided as spatial data and clearly marked on Site Office maps and addressed at daily pre-start meetings when work is required to be undertaken within the vicinity of mapped TECs. Specific INTG management areas are provided in the INTG MP.	Administrative	Site office (or anywhere else suitable).	Prior to commencing any work on area containing TEC.	Once, ongoing.	Site Supervisor / HSE Manager
	For INTG TEC, specific management measures are addressed in separate specific INTG Management Plan for the Project.	N/A	Disturbance Footprint		Ongoing	HSE Manager
	For Mallee Bird Community (MBC) TEC: • Ensure that the Approved Disturbance Footprint in MBC TEC (0.73 ha along OTL) is clearly presented in spatial data and Site Office Maps. • Ensure that the approved Disturbance Footprint is clearly indicated prior to clearance occurring.	Administrative	Disturbance Footprint, Development Envelope, Site Office	Prior to commencing any work on area containing TEC	Once, ongoing.	Site Supervisor / HSE Manager

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4.8	**Clearance of EPBC listed Threatened Ecological Communities outside the approved clearance area**					
	For INTG: specific management measures are addressed in separate specific INTG Management Plan for the Project.	N/A	Development Envelope	During Construction	Ongoing	Various
	For MBC TEC: Ensure that areas of MBC TEC outside of the Approved Disturbance Footprint are marked as Ecological No-Go Zones for the duration of construction works. This will include being clearly marked on Site Office maps and spatial data applications; as well as being addressed at daily pre-start meetings when works are required to be undertaken within the vicinity of mapped TECs.	Administrative	Disturbance Footprint, Development Envelope, Site Office	Prior to commencing any work on area containing TEC.	Once, ongoing.	Site Supervisor / HSE Manager
4.9	**Indirect impact to EPBC listed threatened flora species within Development Envelope (through dust emissions and altered hydrology)**					
	All staff and contractors will complete a detailed, site-specific induction which provides an overview of EPBC listed threatened plants and how to identify them, if encountered in the field. Identification fact sheets will be displayed in prominent location of Site Office / Operations and Maintenance compound(s) for regular reference. A reporting system, as part of a Chance Finds Procedure will be in place for any suspected identification of EPBC listed threatened plant species.	Administrative	Site Office, Construction Compounds, Breakrooms, O&M facilities	Prior to commencing any groundwork, and intermittently at pre-start meetings as required.	Once, ongoing	All staff on site. Site Supervisor / HSE Manager
	For Disturbance Footprint areas which occur outside of the current 'high confidence' survey area including if micro-siting to occur within these areas, a qualified ecologist must undertake targeted area search to confirm no EPBC listed threatened species occur within the area, and no other previously undetected risks are present. See **Figure 9.3** and **Figure 9.4** for Flora Risk Management Areas.	Administrative	Development Envelop	Prior to commencing work in any updated impact areas.	Once, ongoing	Site Supervisor / HSE Manager
	For *Acacia spilleriana* (planted specimens) which occur west of the intersection of Gum Hill Road and Kolinda Road (outside of the Disturbance Footprint and Development Envelope: • Avoid use of Gum Hill Road for regular site access to the site. Regular site access to occur along prescribed access track as indicated in **Figure 9.5**	Administrative	Disturbance Footprint, Development Envelope, Site Office	Prior to commencing any work on area containing TEC.	Once, ongoing.	Site Supervisor / HSE Manager

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	• Mark area as 'Ecological No-Go Zone' on all Site Office maps and spatial data applications. • Sign post and enforce reduced speed limit of 25 km/hr within 100 m of known individuals if road is required to be trafficked at any time. See **Figure 9.5** for Spiller's Wattle Management Zone.					
	For *Dodonaea procumbens* (Trailing Hop Bush) occurring in Mokota Conservation Park: • Impose dust suppression measures through either application of material binders along roads in these sections, or speed limits of 25 km/hr within 100 m of known individuals / populations, enforced using signposts, with monitoring for compliance. • Mark area as 'Ecological No-Go Zone' on all Site Office maps and spatial data applications. • Refer to dust and hydrology specific management actions for other standard measures to reduce indirect impacts on vegetation. See **Figure 9.6** for Trailing Hop-bush Management Zone.	Administrative	Disturbance Footprint in Mokota Conservation Park	During construction	Once, ongoing	Site Supervisor / HSE Manager
	Other - general					
	Impose dust suppression measures through either application of material binders along roads or reduce speed limit to 25 km/hr within Significant Vegetation Overlay Areas (i.e. adjoining Conservation Areas at Mokota Conservation Park and Mimbara Conservation Park (See **Figure 9.7),** and Tiliqua Nature Reserve. Enforce using signposts with monitoring for compliance.	Administrative	Within 50 m of Protected Area Boundary.	During construction	Ongoing	All contractors / Site Supervisor / HSE Manager
	To reduce further loss of vegetation, woody vegetation (i.e. trees) will be felled away from areas of retained vegetation where practicable. Where trees unavoidably fall into retained areas, they will be left in-situ to mimic natural tree fall and provide habitat for ground dwelling fauna.	Administrative	Disturbance Footprint	During construction	Ongoing	Construction contractor / HSE Manager

Flora and Vegetation Management						
	Impose strict No-Go Zones for construction workers and machinery outside of the Approved Disturbance Footprint.	Administrative	Project Area	During construction	Ongoing	Site Supervisor / HSE Manager
	Implement a site-specific Rehabilitation Management Plan, developed by Construction Contractor, to be commenced as soon as practicable after temporarily cleared areas are no longer required for construction purposes.	N/A	Temporary Disturbance Footprint	During construction	Ongoing, as required	HSE Manager

8.5 Fire Protection, Hazard and Risk Management Measures

New infrastructure and changing land use has the potential to increase risk or add new hazards to a site. Construction activities include the use of heavy machinery during construction, and installation of equipment which may increase the fire risk in an area, however **Table 8.5** lists some of the mitigation measures being considered to minimise the risk of fire during construction. The changed use of land may also impact the existing activities which are occurring within the landscape. Measures have been implemented in the design phase to mitigate potential risk, as listed below, including, but not limited to:

- Electricity services (i.e. cabling) is installed underground within the WF to reduce risk of spark ignition.
- The SA Country Fire Service (CFS) has been consulted during design to ensure that roads are designed to carry fully loaded fire fighting vehicles.
- A Fire and Emergency Response Plan will be prepared and will be implemented during construction.
- The detailed project design is in accordance with relevant industry standards, including requirements for emergency vehicle access.
- Design of the OTL has included installation of taller towers, or selectively placed towers to ensure that clearance of overhead lines from vegetation is sufficient to negate the need for vegetation maintenance zones, and thus also reduce fire risk from electrical faults.

Table 8.5 Fire Protection, Hazard and Risk Management Measures during Construction

Hazard and Risk Management	
Reference Documents	• Fire and Emergency Response Plan. • Project Risk Register.
Objectives	• Minimise risk of bushfire ignition during construction of the Project. • Minimise the risk of an externally ignited bushfire from interacting with or impacting the Project. • Minimise changes to existing land use practices.
Targets	• No bushfire incidents caused by Project activities. • Bushfire events that originate outside of the Project are managed in accordance with the Projects Emergency Response Procedures. • All emergency events are responded to with the result of limiting harm to personnel, property, infrastructure and ecological values.

Hazard and Risk Management						
Trigger for review of management measures and specific corrective action	• Occurrence of bushfire or environmental emergency. • Regulatory updates.					
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
5.1	Increase in prevalence and severity of bushfires because of site works.	Construction	Low	Major	High	Low
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
5.1	**Increase in prevalence and severity of bushfires because of site works.**					
	Ensure appropriate storage and handling of flammable materials on site, including requirement for any dangerous goods transport / handling.	Engineering	Project Area	During construction	Ongoing	Site Manager / HSE Manager
	Utilise equipment and machinery (including turbines) with high safety standards.	Engineering	Project Area	During construction	Ongoing	Neoen, EPC contractor and subcontractors
	Implement designated 'smoking zones' in low-risk break areas or on hard surfaces (hardstands etc.). Enforce ban on smoking in all other areas of the Project Area.	Administrative	Project Area	During construction	Ongoing	Site Manger and all personnel
	Implement standard operating procedures including 'stop work' procedures relating to work on days of extreme or catastrophic fire danger.	Administrative	Project Area	On days of extreme / catastrophic fire danger	As required	Site Manager
	Access and egress tracks maintained and kept free of parked vehicles to ensure rapid response.	Engineering	Project Area	During construction	Ongoing as required	Site Manager
	Ensure appropriate fire-fighting equipment is held on site to respond to minor events during construction of the project (i.e. fire extinguishers, water carts etc.). Clearly label and map location of firefighting equipment at all work sites. Ensure equipment is regularly maintained and certified.	PPE	Site Office / Compounds	Prior to and during construction	Ongoing	Site Manager and HSE Manager
	Regular pre-start / toolbox discussions to raise awareness of hazards and ensure controls are understood and appropriate Hot Work Permits are in place with designated Safe Work Method Statement (SWMS).	Administrative	Site Office / Compound	During construction	Weekly in summer months	Site Manager and HSE Manager

Hazard and Risk Management						
	Provide basic training to all staff in the use of fire-fighting equipment and ensure that the location of firefighting equipment is clearly communicated.	Administrative	Site Office / Compounds	During construction	As part of induction and then regular reminders.	Site Manger and HSE Manager
	Develop emergency provisions and a notification system for involved and neighbouring property owners.	Administrative	Project Area and surrounding properties	Pre-construction	Once	EPC contractor and HSE Manager
	Liaise with local CFS to conduct regular fire drills to test and measure site preparedness, site emergency evacuation procedures and staff awareness and consultation / communication protocols with emergency services and surrounding landholders. Fire drills will be carried out in accordance with local CFS requirements which will be obtained through consultation with CFS prior to construction.	Administrative	Project Area	During construction	Twice yearly	EPC contractor and HSE Manager

8.6 Hazardous Materials and Dangerous Goods Management Measures

The construction of a wind farm introduces several risks associated with hazardous materials and dangerous goods. During the installation and maintenance of wind turbines and associated infrastructure, workers handle various chemicals such as lubricants, coolants, and hydraulic fluids, which may should be managed properly to ensure safety and environmental protection. The transportation and storage of some materials require stringent safety protocols to prevent leaks, spills, and inappropriate use. Equipment malfunctions and inadequate ventilation in confined spaces can further exacerbate these risks, potentially leading to chemical exposure and contamination. Implementing comprehensive safety measures and regular monitoring is crucial to mitigate these risks and ensure the safety of both workers and the surrounding environment (**Table 8.6**).

Table 8.6 Hazardous Materials and Dangerous Goods Management Measures during Construction

Hazardous Materials and Dangerous Goods Management	
Reference Documents	• *Dangerous Substances Act 1979*. • *Dangerous Substances Regulations 2023*. • Australian Code for the Transport of Dangerous Goods by Road and Rail.
Objectives	• Minimise risk of contamination of the environment, property and health and safety of personnel. • Store and use hydrocarbons and chemicals in a manner that prevents discharge to the environment.
Targets	• No harm is caused to the environment, property or health and safety of personnel by inappropriate storage or use of hazardous materials or dangerous goods. • Do not exceed workplace exposure standards for hazardous airborne chemicals. • No hydrocarbon or chemical spills above 20L during Project activities. • Hydrocarbons and chemicals are stored and handled in accordance with their safety data sheet (SDS) requirements.
Trigger for review of management measures and specific corrective action	• Incident occurrence. • Regulatory Changes. • Inspection / audit findings. • Environmental Monitoring findings. • Updated safety protocols (i.e. for storage, handling and disposal of hazardous materials).

Hazardous Materials and Dangerous Goods Management						
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
6.1	**Chemical spills (e.g. fuel/diesel) leading to loss or damage to vegetation and contamination of soil and /or waterways**	Construction	Possible	Major	High	Medium
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
6.1	**Chemical spills (e.g. fuel/diesel) leading to loss or damage to vegetation and contamination of soil and /or waterways**					
	Regularly discuss hazardous materials and dangerous goods control measures during pre-start or toolbox meetings.	Administrative	Site office.	During pre-start or toolbox meetings.	Regularly (weekly as a minimum).	Site Supervisor / HSE Manager
	All washing out of concrete to be captured within lined non-permeable bund or skip and disposed of within construction and demolition waste.	Engineering	Disturbance Footprint.	During concrete works.	As required.	Site Supervisor / HSE Manager
	All hazardous materials and hydrocarbons will be appropriately transported, stored and handled during construction in accordance with relevant guidelines and regulations, to avoid release or impact on the environment. These guidelines primarily include the Australian Code for the Transport of Dangerous Goods by Road and Rail 7th Ed, AS 1940 and AS 3833, or noted in each chemicals relevant SDS.	Administrative	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
	Where these portable or freestanding chemical bunds are exposed to the weather, the bunds would be covered or otherwise monitored and drained to ensure the availability of bund capacity in the event of an uncontrolled release.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
	The physical position of the chemical storage units, bunds and fuel storage containers that may be utilised will be subject to the requirements of the relevant supporting legislation. Broadly the placement will be in a location where impacts on the environment, including from the physical release of chemicals or odour, will be minimised.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager

Hazardous Materials and Dangerous Goods Management						
	Make provision for the spill catchment capacity to be at least 110% of the volume of the largest bulk container or 25% of the total capacity of all containers stored in a bunded area. All bunded areas are to have an impervious lining.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Drain bunded areas when necessary and test and dispose of accordingly, which may include using a licensed waste operator.	Engineering / Administrative	Disturbance Footprint.	During construction.	As required.	Site Supervisor
	Safety Data Sheets (SDS) will be required for all hazardous materials kept on site. Procedures for mitigating specific impacts from materials will be governed by the appropriate SDS.	Administrative	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
	All hazardous materials and dangerous goods containers and storage areas will be clearly identified with labelling and signage.	Administrative	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Portable metal or plastic fuel containers of normal capacities up to and including 25 litres must comply with the requirements under AS/NZS 2906:2001 Fuel containers - portable-plastic and metal. Containers covered by this Australian Standard (AS) are suitable for use with leaded, unleaded and super grades of petrol, two-stroke engine fuel, and kerosene and distillate (diesel fuels).	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Minor storage quantities as per AS 1940 on open land will adhere to the following: • Liquid will be kept at least 1.0 metre from any boundary, workshop, dwelling or protected place, body of water, watercourse or environmentally sensitive area. • The ground around the store will be kept clear of combustible vegetation or refuse for a distance of at least 3.0 m. • Any potential flow or spillage will be prevented from reaching a protected place, watercourse or property boundary by such means as the use of natural ground slope, or the provision of a diversion channel, kerb or bund.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
	Adequately supplied spill kits will be kept within the vicinity of the worksite where such hazardous materials are used and stored (i.e. the batching plant site).	PPE	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager

Hazardous Materials and Dangerous Goods Management						
	Workers who transport, handle or use hazardous materials will be trained or have an appropriate level of experience or authorisations relevant to the task and will be aware of emergency response procedures for spill events.	Administrative	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
	Refueling infrastructure to be bunded and covered.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Refuel/lube machines are to be in bunded areas where possible. Where refueling/lube machines are not located in bunded areas, refueling or lubrication of machines must be undertaken at least 40m from any waterway.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Undertake machinery maintenance on a sealed surface or suitable ground covering to capture spills.	Engineering	Disturbance Footprint.	During construction.	As required.	Site Supervisor
	Empty hazardous substance containers will be identified and stored within a storage area designated for “empty containers” only. An “empty container” is a container that has had the material removed. These empty containers must be handled in accordance with the manufacturer’s instructions.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Hazardous materials and dangerous goods containers and storage areas, including refueling areas, should not be placed within 200m of INTG TEC (Class A / B / C). (See INTG MP for specific details).	Engineering	Disturbance Footprint and Development Envelope	Prior to construction commencing	Once	Site Supervisor
	Develop a spill contingency plan on which to base an emergency response in case of a spill or accident involving chemicals. Any such spill may result in possible surface or ground water contamination.	Administrative	Site office / Disturbance Footprint.	Prior to construction works commencing.	Develop once and update as required.	HSE Manager

8.7 Noise and Vibration Management Measures

Construction noise is noise that arises from an activity at a construction site including demolition work, and operation of machinery. Construction noise is considered to have an adverse impact on amenity if measurements taken at a noise affected premises show (Environment Protection Authority, 2024):

- The source noise level (continuous) exceeds 45 A-weighted decibels (dB)(A), or
- The source noise level (maximum) exceeds 60dB(A).

Noise and vibration management measures during construction are listed in **Table 8.7**.

Table 8.7 Noise and Vibration Management Measures during Construction

Noise and Vibration Management	
Reference Documents	• *Local Nuisance and Litter Control Act 2016* (LNLC Act). • Environment Protection (Commercial and Industrial Noise) Policy 2023. • Wind Farms Environmental Noise Guidelines (Song & Yorke, 2021). • AS 2436-2010 Guide to noise and vibration control on construction, demolition and maintenance sites (Standards Australia, 2010). • Guideline for the Management of Noise and Vibration: Construction and Maintenance Activities EHTM Attachment 7D (Department for Infrastructure and Transport, 2021).
Objectives	• Protect health and comfort of personnel from noise impacts due to the Project Operations. • Avoid or minimise noise emissions to nearby landowners, sensitive receptors and fauna from construction activities.
Targets	• Noise levels at existing non-involved residential receptors do not exceed trigger levels listed in Environment Protection (Commercial and Industrial Noise) Policy 2023. • No complaints received of excessive noise and vibration as a result of the construction activities.
Trigger for review of management measures and specific corrective action	• Exceedance of noise/vibration limits. • Regulatory updates. • Incident reports.

Noise and Vibration Management						
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
8.1	Impacts on sensitive receptors such as residential dwellings including noise impacts caused by machinery and construction activities and vibration impacts caused by pile driving and blasting.	Construction	Almost certain	Minor	High	Low
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
8.1	**Impacts on sensitive receptors such as residential dwellings including noise impacts caused by machinery and construction activities and vibration impacts caused by pile driving and blasting.**					
	Restricted hours of operation are required if noise generating activities are likely to impact sensitive receptors. These activities are only permitted between 7am and before 7pm.	Administrative	Project Area	During construction	Ongoing	Site Supervisor
	Shut down noise generating equipment such as generators and heavy machinery when not in use.	Engineering	Project Area	During construction	Ongoing	Construction Manager, HSE Manager
	Undertake and submit a pre-construction noise assessment based on final WTG selection and layout. Measured and reported in accordance with *IEC61400-11 Ed3.0; Wind turbines – Part 11: Acoustic noise measurement techniques*.	Administrative	Project Area	Prior to construction commencing	Once	Neoen
	Background noise assessment undertaken in accordance with the EPAs *Wind Farms environmental noise guidelines 2021* (Song & Yorke, 2021) prior to start of construction at the following localities: GN15, GN47, GN54, GN57, GN62, GN65, GN91. Submit final noise assessment report to State Commission Assessment Panel (SCAP).	Administrative	Specified WTG locations	Prior to construction commencing	Once	Neoen
	Maintain a noise and vibration complaints procedure and register and ensure noise or vibration complaints are investigated appropriately.	Administrative	GRC	During construction	Ongoing	EPC Contractor, Community Liaison Officer

8.8 Soil Erosion, Drainage and Altered Hydrology Management Measures

Large scale civil construction projects have the potential to cause local impacts to soil erosion, drainage and hydrology. High risk activities include site and infrastructure establishment, topsoil stripping and approved vegetation removal, aggregate storage and stockpiles, concrete mixing, water provision, and stormwater drainage – management measures during construction are summarised in **Table 8.8**.

Table 8.8 Soil Erosion, Drainage and Altered Hydrology Management Measures during Construction

Soil Erosion, Drainage and Hydrology Management	
Reference Documents	• *Environment Protection Act 1993* (SA). • Environment Protection (Water Quality) Policy 2015. • Best Practice Erosion & Sediment Control (IECA, 2008). • EPA Guideline for stockpile management (EPA, 2020). • Stormwater Pollution Prevention, Code of Practice for the Building and Construction Industry (EPA, 1999). • Soil Erosion and Sedimentation Control Plan and / or Stormwater Management Plan.
Objectives	• All erosion and sediment control measures installed in accordance with the requirements of the detailed Soil Erosion and Sedimentation Control Plan and Stormwater Management Plan. • Regular monitoring to ensure no contamination of site soils, surface water courses or groundwater in the vicinity of the Project area.
Targets	• No significant erosion events caused by the Project. • No siltation to local waterway caused by the Project. • No soil or water contamination caused by the Project.
Trigger for review of management measures and specific corrective action	• Erosion, siltation and / or water contamination event reported in Project Area as a result of construction works.

Item	Potential impact	Timing	Likelihood	Consequence	Inherent Risk Rating	Residual risk rating
10.1	Erosion	Construction	Almost certain	Moderate	High	Medium
10.2	Landslip events	Construction	Possible	Major	High	Medium

Soil Erosion, Drainage and Hydrology Management						
10.3	Land contamination by on-site construction activities or by export of contaminated material from site of importation of contaminated material.	Construction	Possible	Major	High	Medium
10.4	Sediment from disturbed areas may enter nearby waterways and reduce water quality.	Construction	Possible	Major	High	Medium
10.5	Physical damage or alteration to riparian areas.	Construction	Possible	Moderate	Medium	Low
10.6	Interference with stream flow in the riparian zone.	Construction	Possible	Moderate	Medium	Low
10.7	Introduction of weeds and pests in the riparian zone.	Construction	Possible	Moderate	Medium	Low
10.8	Degradation of groundwater resource	Construction	Possible	Major	High	Medium
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
10.1	**Erosion**					
	Develop a detailed Erosion and Sedimentation Control Plan (ESCP, or equivalent) for the overall site prior to disturbing any soil on site. Ensure the ESCP shows the type and location of all erosion and sediment controls and that they are implemented during construction as well as reviewed and updated regularly.	Administrative / other	For the Project Area.	Prior to disturbing any soil.	Develop it once. Review and update it regularly as required.	Site Supervisor / HSE Manager
	Limit vegetation clearing to the minimum required for construction works and safety, and where possible, retain established trees, native shrub understorey and native grasslands.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	HSE Manager
	Ensure that the area of disturbance and the length of time that areas are left exposed is minimised as much as possible through appropriate scheduling of activities, including when multiple contractors are involved.	Administrative	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Utilise existing access tracks as much as possible and apart from initial earthworks to construct access tracks and hardstand areas, ensure all vehicles and construction equipment always utilise dedicated access tracks and hardstands within the wind farm and do not travel outside of these areas.	Substitution	Project Area.	During construction.	Ongoing.	Site Supervisor

Soil Erosion, Drainage and Hydrology Management						
10.2	**Landslip events**					
	Control measures, such as soil berms, cut-off drains, rock rip-rap, sediment fences, mulch berms and sediment traps, will be installed to: • reduce stormwater runoff velocity to prevent erosion • capture and remove sediment from stormwater runoff to prevent sedimentation of downstream habitats, drainage lines or watercourses. Control measures will be installed in accordance with *Best Practice Erosion and Sediment Control* (IECA, 2008).	Engineering	Disturbance Footprint.	Immediately upon commencement of disturbing soil	Ongoing.	Site Supervisor
	Ensure the weather forecast, particularly rainfall, is checked regularly and communicated to all staff and contractors during daily pre-start meetings. Erosion and sediment control measures implemented accordingly.	Administrative	Project Area.	During construction.	Checked regularly and communicated during daily pre-start meetings.	Site Supervisor
	Visual inspection of susceptible areas following heavy rainfall or landslip inducing event.	Administrative	Project Area	During construction	Immediately following heavy rainfall and as required thereafter.	HSE Manager
10.3	**Land contamination by on-site construction activities or by export of contaminated material from site of importation of contaminated material.**					
	Rumble grids will be implemented where needed to prevent vehicles exiting the site from dragging out sediment onto local roads. If required, vehicles will be washed down prior to leaving and wastewater will be managed to prevent offsite impacts.	Engineering	Site entrance/exit.	Prior to disturbing any soil.	Ongoing.	Site Supervisor
	All washing out of concrete to be captured within lined non-permeable bund or skip and disposed of within construction and demolition waste.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
10.4	**Sediment from disturbed areas may enter nearby waterways and reduce water quality.**					

Soil Erosion, Drainage and Hydrology Management						
	Construct windows (small soil berms) to direct stormwater into controls and prevent uncontrolled, and/or sediment laden, stormwater leaving the Disturbance Footprint and entering natural drainage lines.	Engineering	As required adjacent to access tracks and hardstands.	Immediately upon commencement of constructing access tracks and hardstands.	Ongoing.	Site Supervisor
	Stockpiles will be managed in accordance with the EPA *Guideline for stockpile management* (EPA, 2020) and *Stormwater Pollution Prevention, Code of Practice for the Building and Construction Industry* (EPA, 1999).	Administrative / Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Where practicable, spoil material (e.g. from trenches and pits) will be stockpiled on the uphill side of any exposed trench and sediment control installed, if required.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	If turbidity is detected in waterways, investigate cause and address accordingly.	Administrative				
10.5	**Physical damage or alteration to riparian areas.**					
	Minimise vegetation removal and construction activities in waterways. Operate in accordance with ESCP.	Engineering	Disturbance Footprint intercepting waterways	During construction	Ongoing, as required	Site Supervisor / HSE Manager
10.6	**Interference with stream flow in the riparian zone.**					
	All natural drainage lines immediately downstream of the Disturbance Footprint will be checked for signs of erosion and or sedimentation. Water quality testing undertaken if impacts observed.	Administrative	Immediately downstream of the Disturbance Footprint.	During construction.	Regularly, particularly after any significant rainfall event.	Site Supervisor / HSE Manager
	Obtain water required for construction from sources other than local waterways.	Substitution	Project Area	During construction	As required.	Site Supervisor
10.7	**Introduction of weeds and pests in the riparian zone.**					

Soil Erosion, Drainage and Hydrology Management						
	Follow measures outlined in **Section 8.10.** Develop and implement a Weed and Pest Management Plan, detailing procedures for cleaning and checking construction vehicles entering the construction site.	Administrative	Disturbance Footprint	Prior to construction commencing and during construction.	Once, ongoing.	EPC Contractor / HSE Manager / Site Supervisor
	Treat or remove weed species in riparian areas within and adjacent to wind farm infrastructure (for example Bathurst Burr, *Xanthium spinosum* which occurs predominantly in creek lines). (See **Section 9.0, Figure 9.8** on **Page 99** for existing known locations of Declared weeds)	Engineering	Disturbance Footprint	Prior to construction commencing	Once, ongoing	HSE Manger
10.8	**Degradation of groundwater resource.**					
	Follow procedures outlined in **Section 8.6** for management of hazardous materials and dangerous goods which may contaminate groundwater**.**	Administrative	Disturbance Footprint	During construction	Ongoing	HSE Manager
	Comply with Emergency Spill Containment Plan. Ensure robust reporting, investigation and rehabilitation procedures are in place.	Administrative	Project Area	During construction	Ongoing, as required.	HSE Manager
10.9	**Other - general**					
	Ensure all erosion and sediment controls are checked for effective operation and maintained, repaired or improved.	Administrative	Disturbance Footprint.	During construction.	Regularly (weekly as a minimum), and immediately prior to and after any significant rainfall event.	Site Supervisor / HSE Manager
	The Project is in an area of negligible Acid Sulfate Soil Potential. If alternative information comes to light, further information should be obtained from *EPA Guidelines: Site contamination - acid sulfate soil materials* (Environment Protection Authority, 2007).	Administrative	Disturbance Footprint	During construction	As required.	Site Supervisor / HSE Manager
	Refer to INTG Management Plan for specific INTG Management Measures.	NA	Disturbance Footprint	During construction	Ongoing	HSE Manager

8.9 Waste Management Measures

Construction activities generate various types of waste, including hazardous materials, construction debris, and general refuse. Improper handling and disposal of these wastes can lead to soil and water contamination, harm to local wildlife, and increased project costs in addition to tarnished company reputation. Waste management measures intend to address general measures to reduce impact of waste on the environment (**Table 8.9**). A specific Waste Management Plan will be made for the Project.

Table 8.9 Waste Management Measures during Construction

Waste Management	
Reference Documents	• *Environment Protection Act 1993*. • *Environment Protection Regulations 2023*. • Environment Protection (Waste to Resources) Policy 2010. • Environment Protection (Movement of Controlled Waste) Policy 2014. • *Local Nuisance and Litter Control Act 2016* (SA). • Waste Management Plan will be produced by the Contractor prior to construction works commencing.
Objectives	• Promote principles of ecologically sustainable development. • Regulate all aspects of waste management and activities and products that cause environmental harm through the production of waste. • Apply the waste management hierarchy to promote the circulation of materials. • Minimise the impact of waste on the local environment.
Targets	• No incidents of waste littering around the Project Site. • All waste disposed of at appropriate facilities • Site works to comply with the management of soil and water to ensure no negative impacts to human health. • No burial of waste on site.
Trigger for review of management measures and specific corrective action	• Incident occurrence. • Regulatory changes. • Non-compliance inspection findings. • Detection of waste-related contaminants.

Waste Management						
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
12.1	Excessive waste generation, causing over-demand on local landfills or requirement for transport to larger landfills and loss of resources.	Construction	Possible	Minor	Medium	Low
12.2	Contamination of site through generation of waste materials (i.e. concrete dust and associated residues)	Construction	Likely	Major	High	Medium
12.3	Contamination of site and waterways through inappropriate disposal / storage of general waste	Construction	Likely	Major	High	Medium
12.4	Attraction of pests and / or native animals to the site caused by food waste.	Construction	Almost certain	Minor	Medium	Low
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
12.1	**Excessive waste generation, causing over-demand on local landfills or requirement for transport to larger landfills and loss of resources.**					
	Ensure all solid and/or liquid waste is transported by an appropriately qualified waste contractor and transferred to a waste depot licensed to receive it	Administrative	Disturbance Footprint and off-site.	During construction.	Ongoing.	HSE Manager
	Use a hierarchical approach to waste management from the most preferable (reduce, reuse or recycle) to the least preferable (disposal), and prioritise waste management strategies to avoid waste generation.	Administrative	Disturbance Footprint	During construction	Ongoing	HSE Manager
	Implement site waste management plan.	Administrative	Project	Prior to commencing and during construction	Ongoing	HSE Manager
	Provide adequate disposal facilities at all breakrooms and site offices, appropriately signed to indicate waste type.	Engineering	Site facilities	During construction	Ongoing	HSE Manager
	Pre-start / toolbox meetings to regularly cover the importance of appropriate onsite waste management.	Administrative	Site Office	During construction	Ongoing, as required	HSE Manager
12.2	**Contamination of site through generation of waste materials (i.e. concrete dust and associated residues)**					

Waste Management						
	Plan concrete works carefully to minimise generation of excess concrete and associated residues	Administrative	Disturbance Footprint.	Prior to any concrete works.	As required.	Site Supervisor
	Ensure waste concrete is directed to suitable washout pits and allowed to dry and taken to a licensed waste depot or where permitted by the EPA, crushed and reused on site (for example within road-base or turbine excavation backfill).	Engineering	Disturbance Footprint.	During concrete works.	As required.	Site Supervisor
12.3	**Contamination of site and waterways through inappropriate disposal / storage of general waste**					
	Capture sheeting, screens or similar are in place to capture waste materials during construction activities so as to not cause pollution or environmental nuisance.	Engineering	Disturbance Footprint.	During concrete works.	As required.	Site Supervisor
	Ensure all waste is stored on-site in such a manner so as to prevent any materials from entering a waterway or being blown away by the wind and no waste is buried on the site. Small items of waste should be kept in covered bins.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor / HSE Manager
	Ensure that ablutions waste is managed appropriately, and tanks are regularly emptied by a licensed contractor.	Administrative	Disturbance Footprint.	During construction.	Ongoing.	HSE Manager
12.4	**Attraction of pests and / or native animals to the site caused by food waste.**					
	Lidded bins for office / food waste to minimise odours and attraction of pests and native animals or birds.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	HSE Manager

8.10 Weed and Pest Management Measures

Weed and pest management is essential in large construction projects. An increase in movement of vehicles from further afield, coupled with disturbed soil conditions create ideal environments for invasive plants to colonise and spread. Similarly, construction sites have the potential to attract or proliferate pest animal species through improper storage of waste (i.e. food waste) and / or by providing areas suitable to harbour pest animals (i.e. equipment laydown areas and soil mounds). A summary of the weed and pest management measures during construction are listed in **Table 8.10**.

Table 8.10 Weed and Pest Management Measures during Construction

Weed and Pest Management	
Reference Documents	• *Landscape South Australia Act 2019*. • Weed Control Handbook for Declared Plants in South Australia (PIRSA, 2024). • EPA Guidelines for Responsible Pesticide Use (EPA, 2005 (updated 2017)). • National Wildlife Biosecurity Guidelines (Wildlife Health Australia, 2018). • Threat abatement plan for competition and land degradation by rabbits (DoEE, 2016). • Threat abatement plan for competition and land degradation by unmanaged goats (DEWHA, 2008). • Threat abatement plan for predation by feral cats (DCCEEW, 2024). • Threat abatement plan for disease in natural ecosystems caused by *Phytophthora cinnamoni* (DoEE, 2018).
Objectives	• No introduction of new Declared weeds or Weeds of National Significance (WoNS) as a result of Project Activities. • No spread of existing Declared weeds or WoNS as a result of Project Activities. • No introduction or spread of plant pathogens or diseases to the Project Area as a result of Project Activities. • No introduction of new pest animal species as a result of the Project. • No increase in the abundance or distribution of existing pest animal species as a result of the Project.
Targets	• Rigorous weed hygiene procedures implemented and upheld across all aspects of the Project including contractors and sub-contractors. • The site is kept clean, tidy and waste free to prevent attraction or harbouring of pest animal activity through .
Trigger for review of management measures and specific corrective action	• New species identification in / around Disturbance Footprint. • Increased infestation levels recorded around Disturbance Footprint during monitoring. • Incident reports.

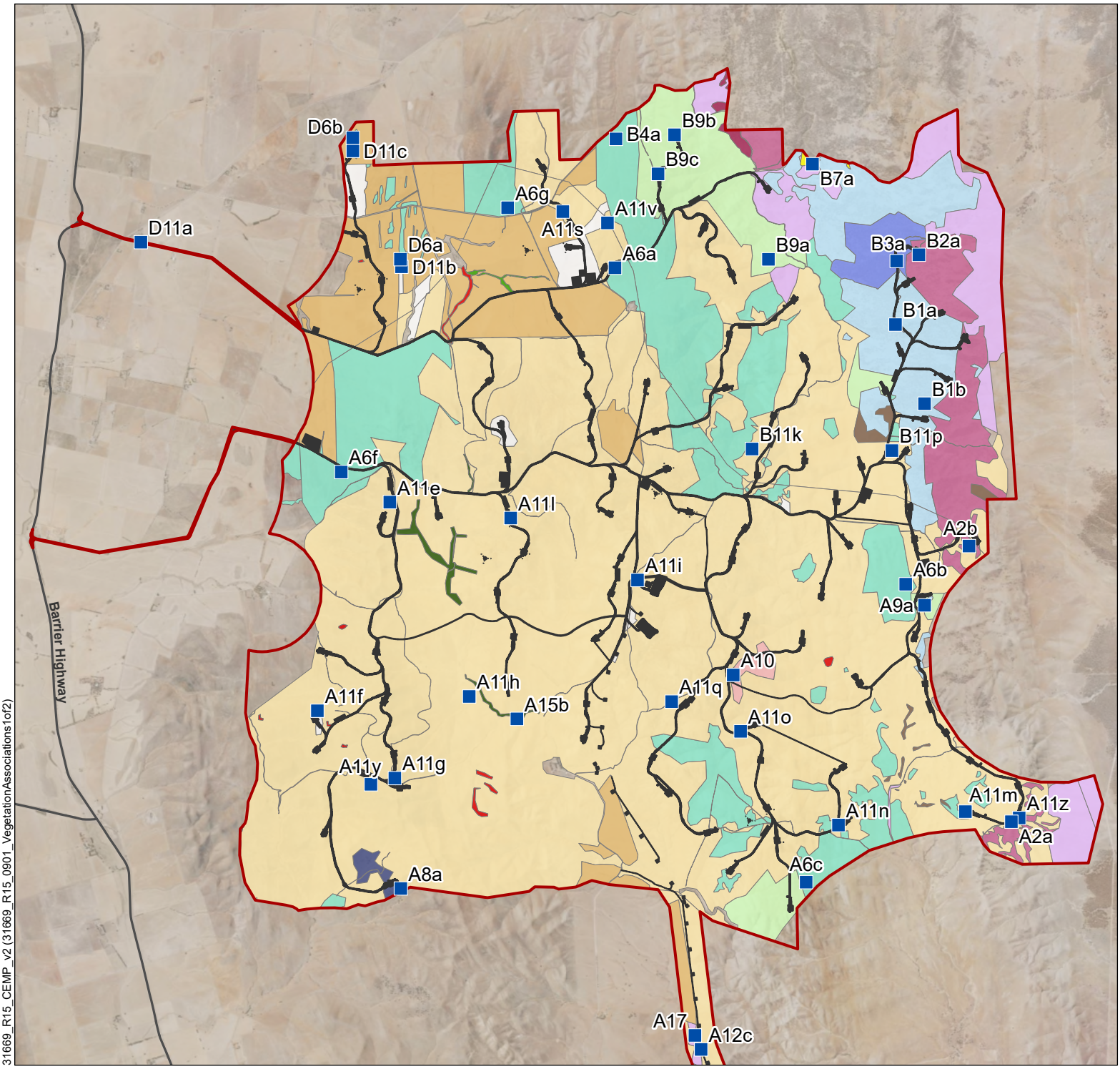
Weed and Pest Management						
Item	**Potential impact**	**Timing**	**Likelihood**	**Consequence**	**Inherent Risk Rating**	**Residual risk rating**
13.1	Increase in abundance, distribution and composition of weed species (including weeds listed as Declared under the Landscape South Australia Act 2019).	Construction	Almost certain	Minor	High	Low
13.2	Increase in abundance and distribution of pest animal species.	Construction	Likely	Minor	Medium	Low
Item	**Construction Management Measures**	**Type**	**Location**	**Timing**	**Frequency**	**Responsibility**
13.1	**Increase in abundance, distribution and composition of weed species (including weeds listed as Declared under the *Landscape South Australia Act 2019*).**					
	Ensure that adequate signage is displayed to advise all employees, agents and contractors on site of the need for vigilant weed and pest control protocol and the need to recognise declared biosecurity protocols.	Administrative	Site Entrance and Compound.	Prior to commencing any construction works.	Ongoing.	Site Supervisor
	Display a fact sheet on Declared and environmental weeds known to occur within the Disturbance Footprint, on site notice boards and in break rooms. Conduct periodic toolbox talks on different Declared weed species.	Administrative	Site Office.	Prior to commencing any work on site.	Once.	HSE Manager
	Undertake a weed survey within the Development Envelope to understand existing weed conditions and potential impacts (e.g. spread) during construction. Focus on localised occurrences of Declared weeds identified in the Project Area such as *Chrysanthemoides monilifera* (Boneseed) (WoNS), *Chondrilla juncea* (Skeleton Weed) *Lycium ferocissimum* (African Boxthorn) (WoNS), *Marrubium vulgare* (Horehound), *Echium plantagineum* (Salvation Jane), *Xanthium spinosum* (Bathurst Burr). Refer to **Figure 9.8** for existing known locations of Declared Weeds, noting that this is not exhaustive.	Administrative	Development Envelope and Disturbance Footprint	Prior to commencing any construction works.	Once.	HSE Manager

Weed and Pest Management						
	Undertake periodic weed control such as (but not limited to) slashing, spraying, or physical removal, prior to the weeds setting seed. Remove or destroy Declared and/or environmental weeds according to relevant guidelines. Prioritise according to risk (i.e. regular transport routes, site offices).	Engineering	Within the Disturbance Footprint and high-risk areas (i.e. watered)	Prior to commencing any construction works.	Once.	Site Supervisor / HSE Manager
	Ensure all vehicles and construction equipment are clean and free of soil material containing weed seed or propagules, prior to arriving on site. Implement a certification procedure to ensure that plant or equipment entering site is weed / seed free. The procedure should include pre-entry requirements, entry inspection, and certification. Certifications should be always kept with the plant and equipment (i.e. certification stocker or similar).	Administrative / Engineering	Prior to entering the Project Area. Designated Site Office.	Prior to entering the Project Area.	Ongoing, as required.	Site Supervisor / HSE Manager.
	Install a designated wash-down bay to clean vehicles and construction equipment during construction works and prior to leaving site (where required), and for any vehicles which do not pass a weed/seed inspection.	Engineering	Site Compound.	Prior to commencing and during construction works.	Once	Site Supervisor
	Identified weed infested areas (Declared or WoNS) will be avoided where practicable.	Elimination	Project Area	During construction	Ongoing	HSE Manager, all Personnel
	Ensure all fill materials (e.g. sand, aggregate) imported to site are sourced from weed and pathogen free sites. The EPC Contractor is to keep all certificates and receipts from suppliers that specifies clean material.	Administrative	Disturbance Footprint.	Every time fill materials are imported to site.	Ongoing.	Site Supervisor
	Store construction vehicles and equipment on constructed hardstands, away from areas of weed infestation.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Monitor soil stockpile areas. If soil or fill material stockpiles become infested with weeds, undertake weed control (spray with herbicide).	Administrative	Disturbance Footprint	During construction	Ongoing, as required	HSE Manager
	Rehabilitate exposed and disturbed soils as soon as possible (i.e. temporary clearance areas)	Engineering	Temporary clearance areas in	As soon as possible during construction.	Ongoing.	Site Supervisor

Weed and Pest Management						
			Disturbance Footprint.			
13.2	**Increase in abundance and distribution of pest animal species.**					
	Ensure construction compounds are always kept neat and tidy, to prevent pest animals from inhabiting the area.	Engineering	Site Compounds.	During construction.	Ongoing.	Site Supervisor
	Ensure food waste is placed in enclosed / covered bins, to prevent pest animals from accessing it.	Engineering	Disturbance Footprint.	During construction.	Ongoing.	Site Supervisor
	Control pest animal species (particularly rabbits, foxes and feral cats) that may proliferate because of site activities. Ensure rabbit control is in accordance with the *Threat abatement plan for competition and land degradation by rabbits* (DoEE, 2016) that includes management of rabbits through one of the following techniques: • biological control agents • fencing • harbour removal • poison baiting • shooting • warren ripping and fumigation	Engineering	Disturbance Footprint, Project Area.	During construction.	Ongoing.	Site Supervisor / HSE Manager
	Report and record rabbit / fox / feral cat sightings (or evidence of).	Administrative	Disturbance Footprint.	During construction.	Ongoing.	HSE Manager
	Refer to specific INTG Management Plan for INTG specific management measures.	NA	NA	During construction	Ongoing	HSE Manager

9.0 Management Maps

Figure 9.1 Native Vegetation Associations and Approved DF Within the GNWF Project Area (1 of 2)



31669_R15_CEMP_v2 (31669_R15_0901_VegetationAssociations1of2)

- Project Area
- Disturbance Footprint
- BAM site

Vegetation Association

- VA1: *Eucalyptus porosa +/- E. gracilis* woodland over Chenopods
- VA2: Smooth Barked mixed mallee
- VA3: *E. porosa* low woodland over *Schlerophyllous* shrubs
- VA4: *Acacia pycnantha* tall shrubland over grass
- VA6: Lomandra Grassland
- VA7: *Acacia spilleriana* Shrubland
- VA8: *Eucalyptus leucoxylon ssp. Pruinosa* (Inland South Australian Bluegum) Open Woodland
- VA9: *Maireana rohrlachii* open shrubland
- VA10: *Allocasurina verticillata* over native grasses and herbs
- VA11a: Native grassland
- VA11b: Native grassland and emergent trees
- VA12: Mixed Chenopod shrubland
- VA14: *E. camaldulensis* Riparian Woodland
- VA15: *Juncus sp.* sedgeland in minor drainage pipe
- VA17: *Cryptandra companulata* open shrubland
- VA18: Mixed Mallee over Chenopods and native grasses
- Amenity Vegetation
- Cropped
- Exotic

umwelt

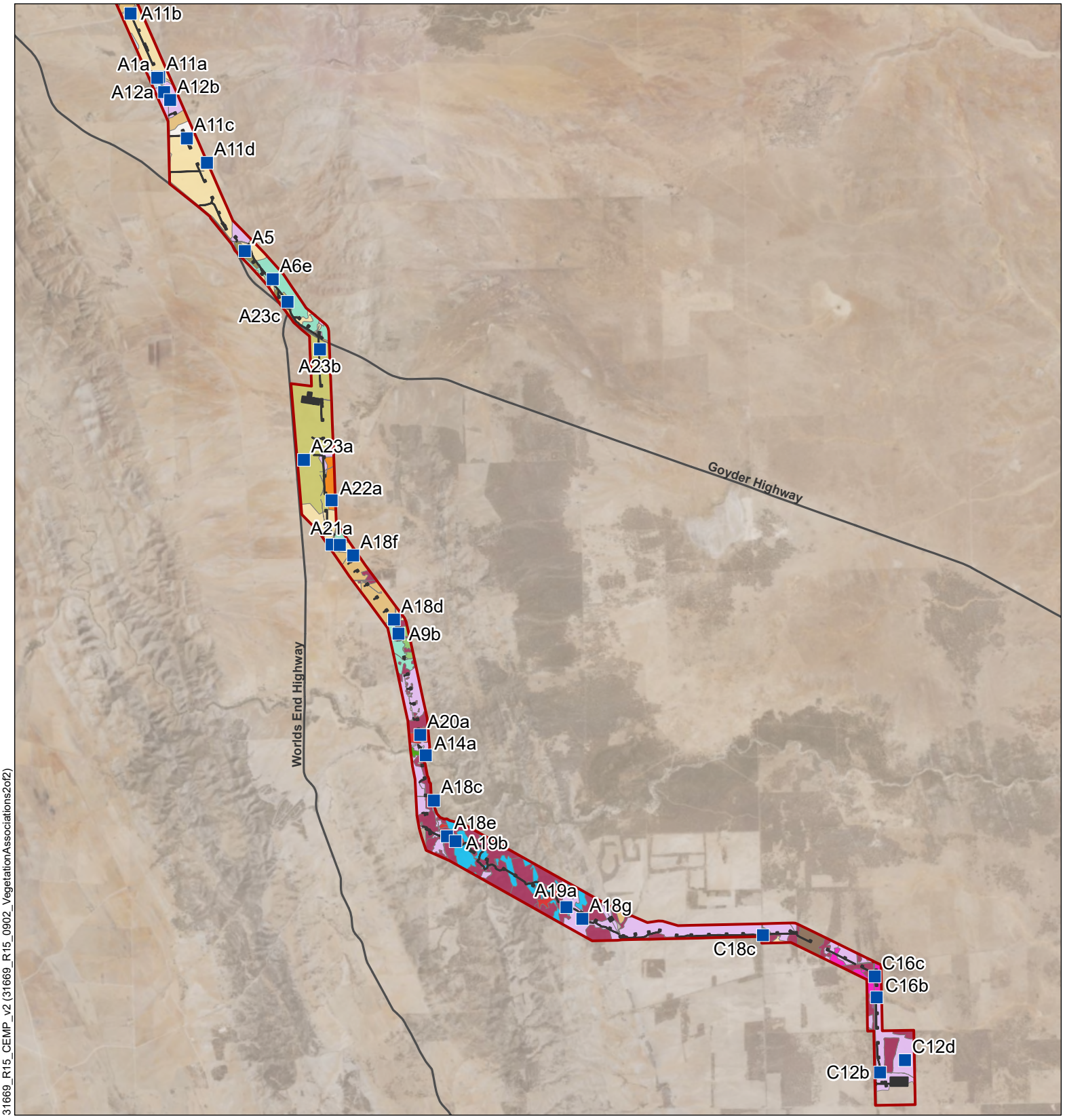
Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 2/09/2025 11:15 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 1 2 km

Figure 9.2 Native Vegetation Associations and Approved DF Within the GNWF Project Area (2 of 2)



31669_R15_CEMP_v2 (31669_R15_0902_VegetationAssociations2of2)

- Project Area
- Disturbance Footprint
- BAM site

Vegetation Association

- VA1: *Eucalyptus porosa +/- E. gracilis* woodland over Chenopods
- VA5: *Maireana aphylla* low shrubland
- VA6: Lomandra Grassland
- VA11a: Native grassland
- VA11b: Native grassland and emergent trees
- VA12: Mixed Chenopod shrubland
- VA13: *Hakea leucoptera ssp. leucoptera* tall shrubland
- VA14: *E. camaldulensis* Riparian Woodland
- VA16: *Acacia nysophylla* shrubland
- VA18: Mixed Mallee over Chenopods and native grasses
- VA19: *Dodonaea lobulata* shrubland on rocky hills
- VA20: *Alectryon oleifolius* Low Woodland over Chenopods
- VA21: *Senna* spp. Shrubland
- VA22: *Scaevola spinescens* Shrubland
- VA23: *Nitraria billardiera* Shrubland
- Amenity Vegetation
- Cropped
- Exotic

umwelt

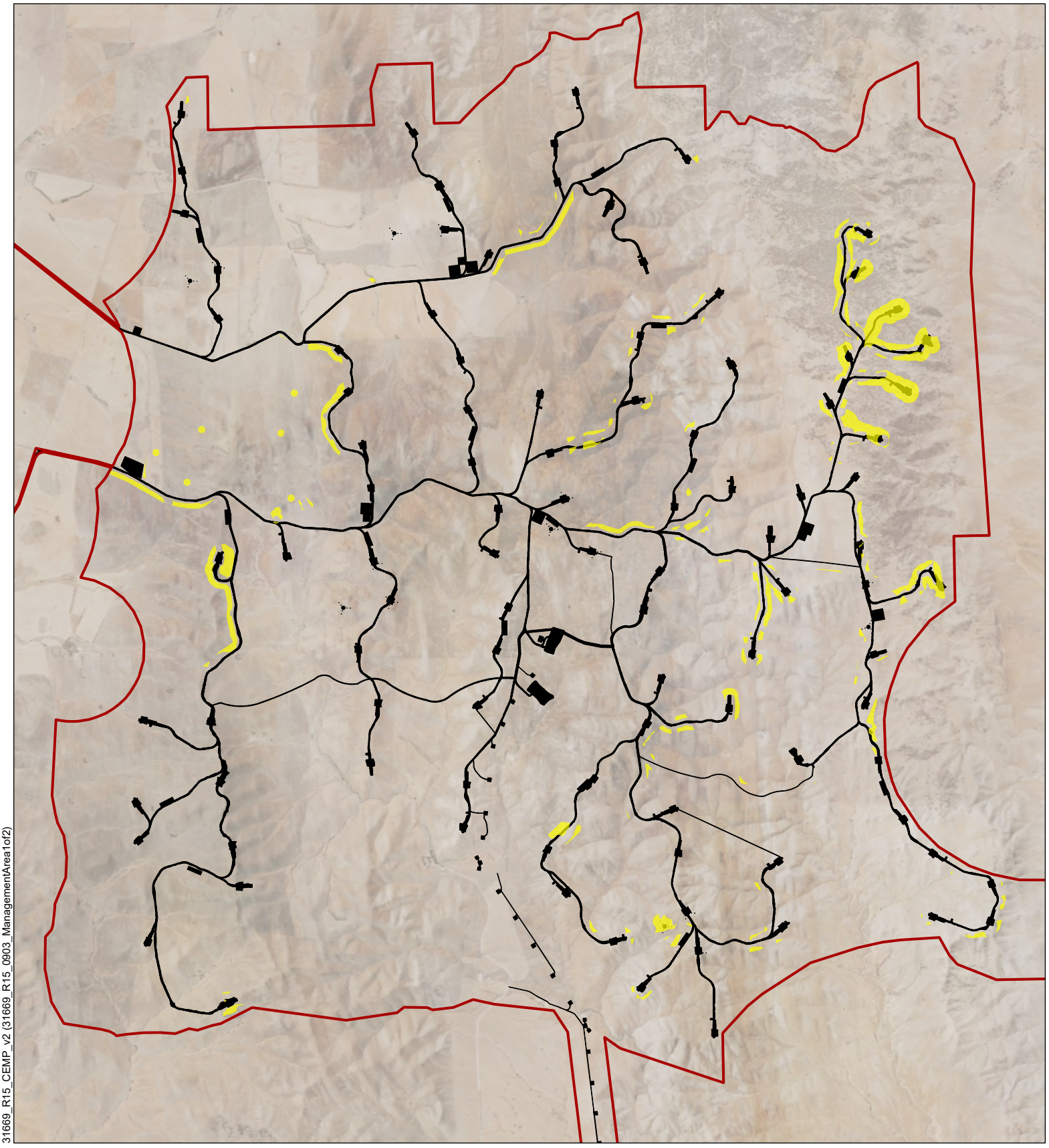
Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 2/09/2025 11:16 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 1 2 km

Figure 9.3 Management Areas for Threatened Flora Within the Wind Farm (1 of 2)



Project Area
Disturbance Footprint
Management area

31669_R15_CEMP_v2 (31669_R15_0903_ManagementArea1of2)

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
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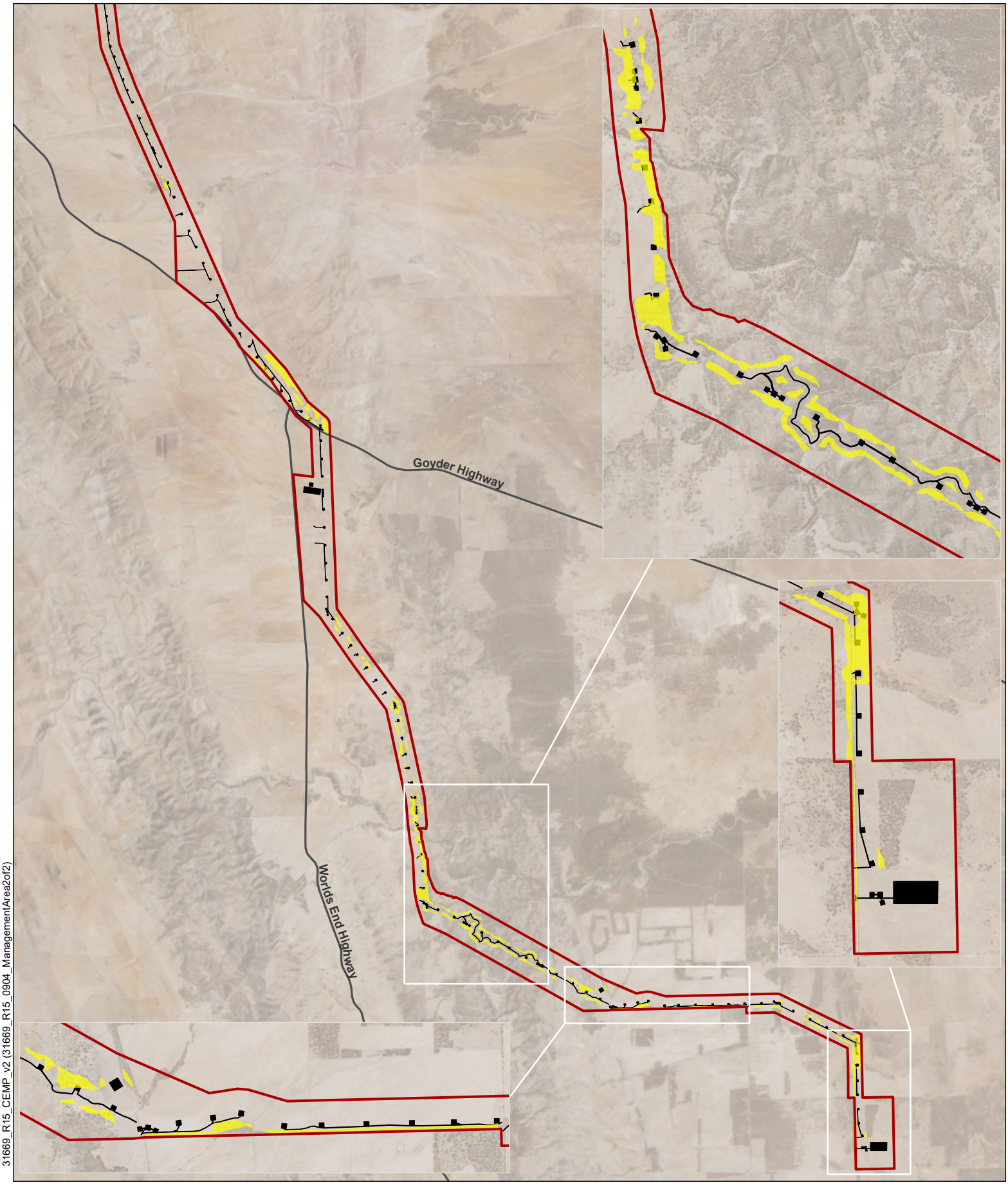
GDA2020 MGA Zone 54

N

0 1 2 km

Figure 9.4 Management Areas for Threatened Flora Within the Wind Farm (2 of 2)



Project Area
Disturbance Footprint
Management area

31669_R15_CEMP_v2 (31669_R15_0904_ManagementArea2of2)

umwelt

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 2/09/2025 10:09 AM
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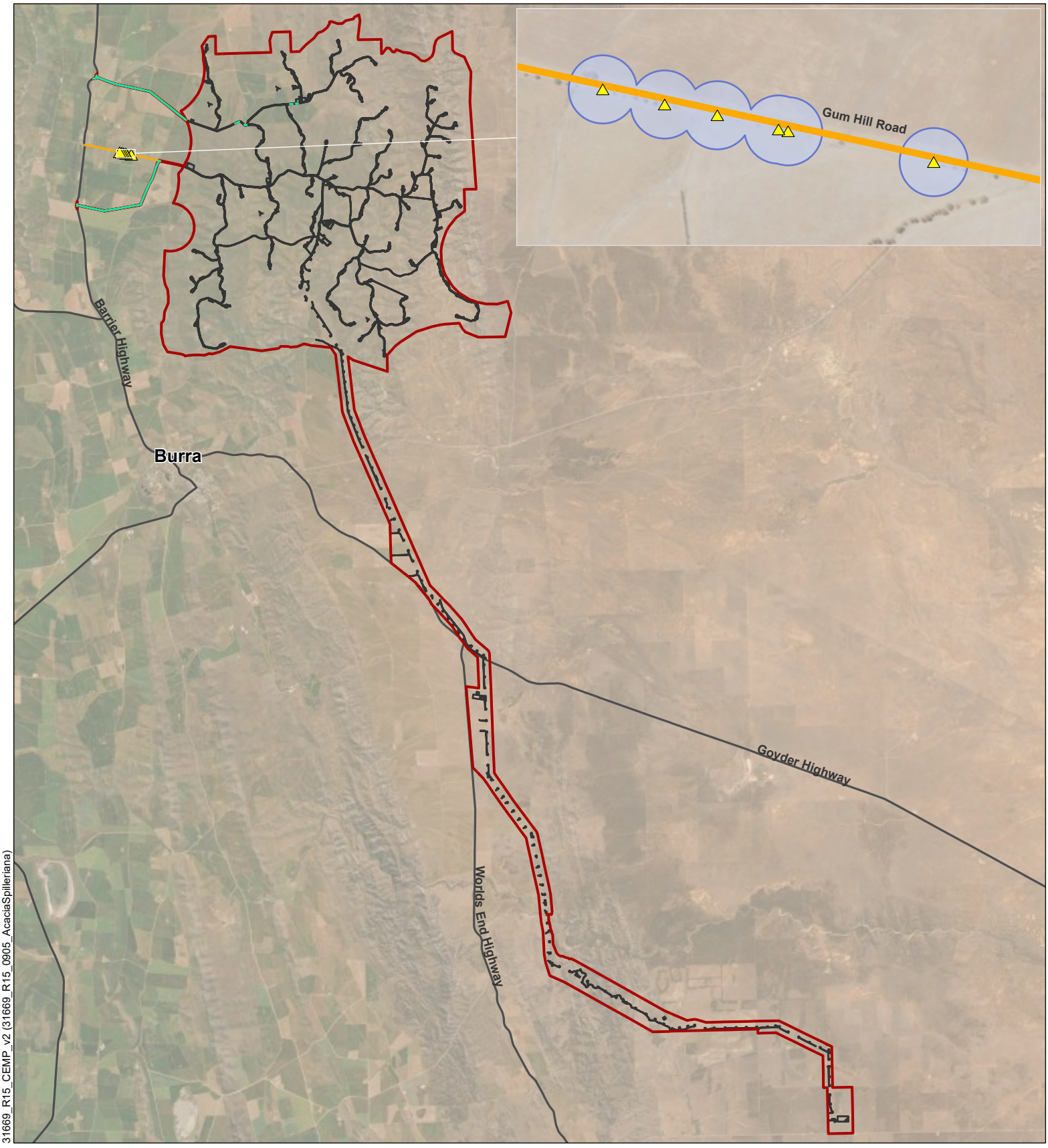
GDA2020 MGA Zone 54

N

0 1 2 km

Figure 9.5 *Acacia spilleriana* Within the GNWF Project Area



Project Area
Disturbance Footprint
Acacia spilleriana management zone
Acacia spilliana

Site access road
Approved
Excluded

31669_R15_CEMP_v2 (31669_R15_0905_AcaciaSpilleriana)

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
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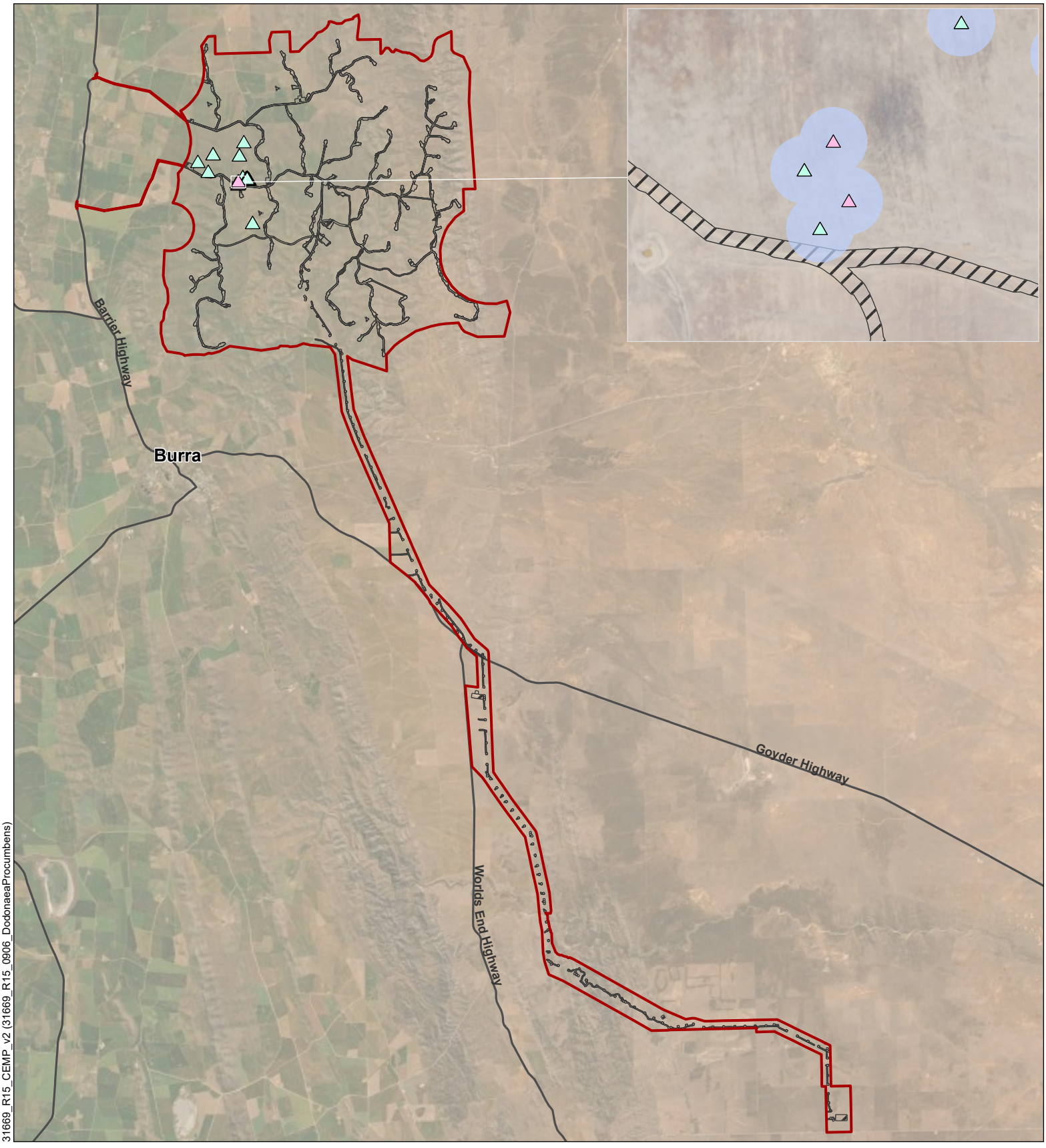
GDA2020 MGA Zone 54

0 2.5 5 km

N

Figure 9.6 Trailing Hop-bush (*Dodonaea procumbens*) Management Zone



Project Area

Disturbance Footprint

Dodonaea procumbens management zone

Dodonaea procumbens - Umwelt

Dodonaea procumbens - BDBSA

31669_R15_CEMP_v2 (31669_R15_0906_DodonaeaProcumbens)

umwelt

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
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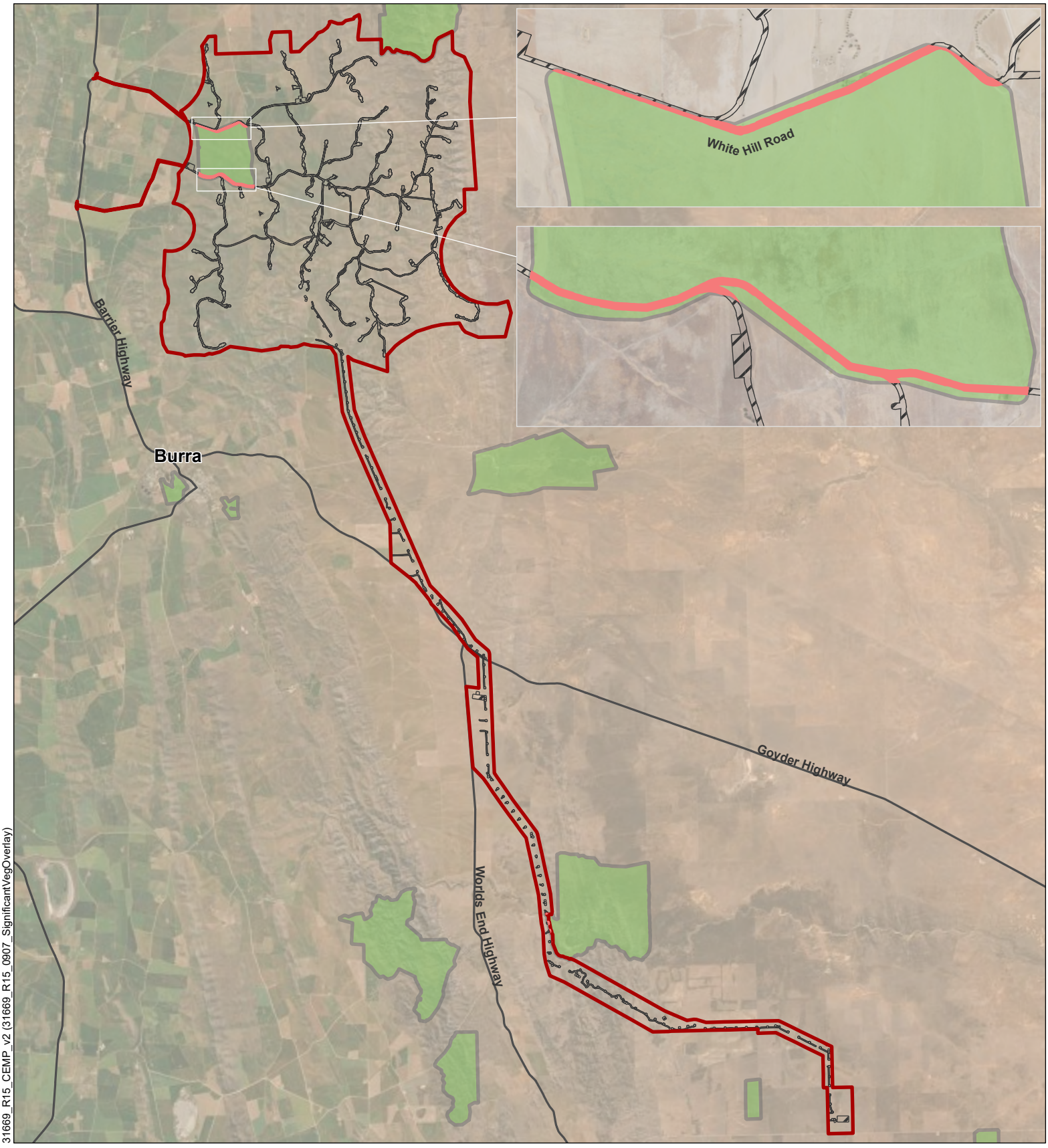
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 2.5 5 km

Figure 9.7 State Significant Native Vegetation Overlay Management Zone



Project Area
Disturbance Footprint
State Significant Native Vegetation overlay
State Significant Native Vegetation speed zone

31669_R15_CEMP_v2 (31669_R15_0907_SignificantVegOverlay)

umwelt

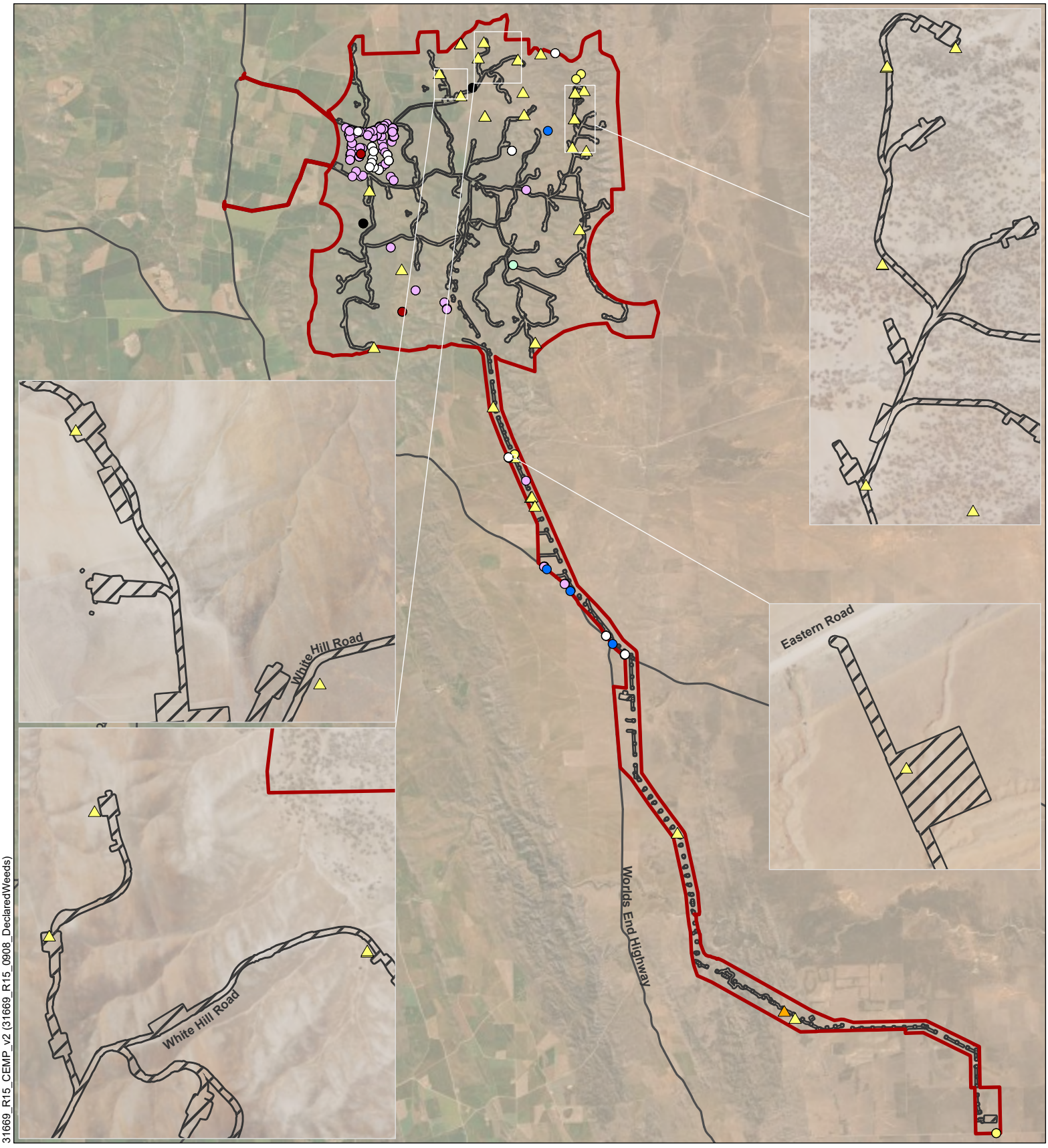
Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 2/09/2025 9:41 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 2.5 5 km

Figure 9.8 Existing Known Declared Weeds Within the GNWF Project Area



Project Area

Disturbance Footprint

Declared weed - Umwelt

- *Chrysanthemoides monilifera* ssp. *monilifera*
- *Lycium ferocissimum*

Declared weed - BDBSA

- *Amsinckia calycina*
- *Echium plantagineum*
- *Lycium ferocissimum*
- *Marrubium vulgare*
- *Reseda lutea*
- *Rosa canina*
- *Solanum elaeagnifolium*

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
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Created by: sophie.haswell

GDA2020 MGA Zone 54

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31669_R15_CEMP_v2 (31669_R15_0908_DeclaredWeeds)

10.0 Response Measures and Corrective Action

If a trigger value occurs (outlined in tables in **Section 8.1** to **Section 8.10**), it will be reported as an environmental incident, and an investigation will be undertaken to determine the extent and cause and to prevent it from occurring again. Impacts are divided into direct and indirect impacts, described further below.

10.1 Direct Impact

If clearance occurs outside of the approved Development Envelope, or in excess of the approved Disturbance Footprint, appropriate mitigation strategies must be implemented immediately. It should be noted that the specific approval conditions are not yet known and will be added / updated to the section below once they become available. General approval conditions which must be adhered to include:

- The applicant must ensure that only native vegetation approved for removal in accordance with the relevant decisions under the NV Act and EPBC Act is removed. Prior to clearance commencing, the applicant must advise all persons undertaking the vegetation removal or working on the site, of all the relevant conditions of approval and associated statutory requirements.
- If there is any change to the clearance requirements for the development, Neoen is to confirm the final clearance area and offset (Significant Environmental Benefit) requirements upon finalising the detailed design of the Project, prior to undertaking any clearance that varies from this decision.
- As such, Neoen must be notified of any clearance outside of the approved Disturbance Footprint and / or Development Envelope so that the relevant authority can be notified.
- A variation to the approval decision(s) will need to be made if impacts are proposed outside of the approved Project Area boundary or are in exceedance of the approved impact upon native vegetation, MNES or MNES habitat.

10.2 Indirect Impact

If an indirect impact trigger occurs (e.g. erosion and / or sedimentation, excessive dust, new weed species or increase in weeds, or others outlined in **Section 8.0**), it must be investigated to determine the extent and cause, and appropriate mitigation measures must be implemented to prevent it from occurring again. Remediation and / or rehabilitation should also be undertaken, provided it does not cause any further adverse impact (such as undesirable soil disturbance).

Indirect impact triggers may result in an adaptive management approach and resulting update or change to the measures outlined in this CEMP or associated sub plans to ensure that the most effective management actions are being implemented. Any material changes to the management plan must be submitted to the Minister for approval prior to the change occurring.

11.0 Monitoring, Audits and Reporting

11.1 Monitoring

Monitoring will be performed throughout the Project and involves the continuous observation and recording of activities, management measures and performance to ensure that everything is proceeding as planned. Monitoring helps in identifying any deviations from the plan in real-time, allowing for immediate corrective actions. Monitoring actions identified for the CEMP management actions are summarised in **Table 11.1** with additional monitoring relevant to specific sub-plans.

Table 11.1 Project Monitoring Requirements

Management Item	Description of monitoring	Responsibility	Frequency
1.2	If dust presents a problem (unsealed areas, concrete batching plants and vegetation adjacent to Project Area), commence regular air quality monitoring around the site to ensure that it is in accordance with relevant standards. Implement adaptive management as required.	HSE Manager	Ongoing, as required.
3.2	Open sections of trench or cable pits must be checked twice daily (morning and afternoon) by any worker. Any fauna trapped within the trench must be removed as soon as possible (and within 24 hours) by qualified fauna spotter/catcher.	HSE Manager	Twice daily when open trenches are present on site.
4.2	Ensure that clearance does not exceed approved clearance area (262.15 ha of permanent clearance and 206.08 ha of temporary disturbance, totaling 468.18 ha). The total area of clearance and the location of clearing will be recorded in centralised dataset and regularly reviewed to ensure no exceedance of permitted clearance.	Construction Manager, Project Engineer, HSE Manager	Ongoing (regular audits)
4.5	Reporting system in place to ensure that any substantial changes to usual grazing regime and / or placement of watering points required because of the construction of GNWF is communicated between landholder and construction contractor / Neoen.	HSE Manager / Neoen	As required
6.1	Drain bunded areas when necessary and test and dispose of accordingly, which may include using a licensed waste operator.	Site supervisor	As required
10.2	Visual inspection of susceptible areas to ensure surface water controls are functioning effectively following heavy rainfall or landslip inducing event.	HSE Manager	Immediately following heavy rainfall and as required thereafter.
10.6	All natural drainage lines immediately downstream of the Disturbance Footprint will be checked for signs of erosion and or sedimentation. Water quality testing is undertaken if impacts observed.	Site Supervisor / HSE Manager	Regularly, particularly after any significant rainfall event.

Management Item	Description of monitoring	Responsibility	Frequency
10.9	Ensure all erosion and sediment controls are checked for effective operation and maintained, repaired or improved.	Site Supervisor / HSE Manager	Regularly (weekly as a minimum), and immediately prior to and after any significant rainfall event.
10.9	The Project is in an area of negligible Acid Sulfate Soil Potential. If alternative information comes to light, further information should be obtained from EPA Guidelines: Site contamination - acid sulfate soil materials (Environment Protection Authority, 2007).	HSE Manager	As required.
13.1	Undertake a weed survey within the Development Envelope to understand existing weed conditions and potential impacts (e.g. spread) during construction. Focus on localised occurrences of Declared weeds identified in the Project Area such as *Chrysanthemoides monilifera* (Boneseed) (WoNS), *Lycium ferocissimum* (African Boxthorn) (WoNS), *Marrubium vulgare* (Horehound) and *Xanthium spinosum* (Bathurst Burr).	HSE Manager	Once, prior to construction commencing
13.1	Undertake periodic weed control such as (but not limited to) slashing, spraying, or physical removal, prior to the weeds setting seed. Remove or destroy Declared and/or environmental weeds according to relevant guidelines. Prioritise according to risk (i.e. regular transport routes, site offices).	Site Supervisor / HSE Manager	As required.
13.1	Monitor soil stockpile areas. If soil or fill material stockpiles become infested with weeds, undertake weed control (spray with herbicide).	HSE Manager	Ongoing, as required.
13.2	Report and record rabbit / fox / feral cat sightings (or evidence of).	HSE Manager	Ongoing, as required.
Other	Monitoring in accordance with specific Sub-plans	HSE Manager	As required.

11.2 Auditing

Auditing involves periodic, systematic review and evaluation of processes, systems, or performance against established standards, criteria or triggers.

Auditing by a qualified independent ecological consultant will be required periodically throughout construction, to ensure objectivity and provide an assessment of compliance and effectiveness of management measures against requirements of the CEMP (and sub-plans). An audit schedule will be determined once the EPC Contractor is selected and works schedule is known. The schedule will coincide with the undertaking of higher risk construction impact activities and mandatory hold point release dates. The auditor will review the relevant documents and define the scope and objectives of the audit and develop an audit-specific checklist to be followed. The auditor will then identify and report on conformances, non-conformances, improvement requirements (and any timeframes to be agreed upon), and general observations.

Additionally, the EPC Contractor will be responsible for undertaking periodic audits throughout the works, on a schedule to be determined once the contractor is selected and program of works known. Audit frequency will depend on the timing and status of construction and are likely to occur as frequent as weekly during early works, slowing to monthly or three-monthly as construction slows.

Auditing requirements will also be included in various sub plans. An indicative schedule is presented in **Table 11.2.**

Table 11.2 Environmental Auditing Schedule

Timing	Internal / External	Objective
Daily	Internal	Regular inspection by Site Supervisor of HSE Manager to inspect site works and subcontractor activities.
Weekly	Internal	HSE Manager to inspect all construction areas pre-, during and post-construction to ensure that no unapproved clearance has occurred, exclusion zones are undisturbed and identify any potential environmental risks. Weekly inspections will follow an Environment Inspection Checklist (or similar), with weekly reporting to the Project Manager, and monthly to Neoen representative.
Monthly during clearance works	External	Inspect vegetation clearance to ensure it aligns with approved design and does not exceed authorized clearance area.
Quarterly and ad-hoc as required	External	Qualified consultants to inspect the site. HSE Manager and /or Project Manager will respond to external audit, implement recommendations and monitor performance to achieve targets.
Six monthly	Internal	HSE Manager and Project Manager to review management targets, environmental objectives and management measures.
Six monthly	External	Relevant body to assess compliance with CEMP and relevant approvals, licenses and permits, as well as management controls and any non-compliances.

11.3 Reporting

Reporting of progress, activities and implementation of management measures including monitoring, will be required to ensure compliance with the regulatory commitments and obligations of the Project. Some reporting events will be for the purposes of internal record-keeping should a future audit be required whereas others will provide evidence to regulators of compliance with licence or permit conditions. Reporting that is required as part of the Project is detailed in **Table 11.3**.

Table 11.3 Indicative Project Reporting Requirements

Report Type	Responsibility	Timing/ Frequency	Submitted to and reviewed by:	Submitted externally to and approved by:
Progress reports	EPC Contractor	Weekly	Project Manager	
Native vegetation clearing shapefiles	EPC Contractor	TBC – NV clearance approval conditions	Environment Manager	Native Vegetation Council
Native vegetation clearing report	EPC Contractor	TBC – NV clearance approval conditions	Environment Manager	Native Vegetation Council

Report Type	Responsibility	Timing/ Frequency	Submitted to and reviewed by:	Submitted externally to and approved by:
Waste quantity reports	EPC Contractor	Quarterly	Environment Manager	EPA
Non-compliance reports	EPC Contractor	As required	Environment Manager	
Corrective action reports	EPC Contractor	As required	Environment Manager	
Incident reports	EPC Contractor	As required	Environment Manager	
New heritage finds	EPC Contractor	As required	Environment Manager	

11.4 Review and Revision of CEMP

The review process will ensure that all environmental documentation including the CEMP and subplans are updated as appropriate for the specific works that are occurring on-site, noting that the CEMP is drafted prior to selection of the construction contractor.

The CEMP will be reviewed quarterly at a minimum by the EPC Contractor and Neoen, but also in the instance of:

- Following significant environmental incidents.
- When there is a need to improve performance in an area of environmental impact.
- Periodically for actions undertaken over long timeframes such as one, two or five years.

Any changes to the CEMP as a result of the review process will require submission to the Minister for written approval of the revised management plan. The varied activity should not commence until the Minister has approved the varied management plan in writing.

12.0 Management Sub-plans

A series of sub-plans (listed below in alphabetical order) will be provided to support the CEMP (and OEMP) and provide further detail regarding impact avoidance, minimisation, management, mitigation and compliance. These will be developed prior to commencement of any activity of relevance to the sub-plan.

12.1 Decommissioning Environmental Management Plan

The Decommissioning Environmental Management Plan (DEMP) will outline the procedures and measures to be taken when decommissioning the wind farm to ensure that the decommissioning process is conducted in a manner that protects the environment, complies with regulatory requirements, and addresses the concerns of stakeholders.

The DEMP is likely to include the following key components:

- Site assessment: an evaluation of the current condition of the wind farm site, including the identification of any environmental sensitivities or constraints, in accordance with the methods accepted by the relevant regulatory body at the time of decommissioning.
- Decommissioning procedures: detailed steps for the safe dismantling and removal of wind turbines, foundations, and associated infrastructure. This includes the management of hazardous materials and waste.
- Environmental protection measures: strategies to mitigate potential environmental impacts during decommissioning, such as soil erosion, water contamination, and disturbance to native vegetation, threatened flora and fauna.
- Rehabilitation and restoration: plans for restoring the site to its original condition or an agreed-upon state, including soil stabilisation, re-vegetation, and habitat restoration.
- Monitoring and reporting: procedures for monitoring environmental impacts during and after decommissioning, and for reporting findings to relevant authorities.

12.2 Dust (Air Quality) Management Plan

The Dust Management Plan aims to minimise the generation and spread of airborne dust to protect the health of workers, nearby residents, and the environment. Key components include identifying potential sources of dust, assessing associated risks, and implementing control measures such as water sprays, barriers, and modifying work processes. The plan also outlines monitoring protocols to ensure dust levels remain within acceptable limits and comply with regulatory standards.

12.3 Fire and Emergency Response Plan

A Fire and Emergency Response Plan aims to ensure the safety of personnel and minimise damage during emergencies such as fires, natural disasters, or other critical incidents. A Fire and Emergency Response Plan will establish clear procedures and responsibilities for responding to emergencies promptly and effectively, and will include:

- Risk Assessment.
- Emergency Procedures: such as identifying evacuation routes, and courses of action in response to fire, hazardous material spill or other major incident.
- Communication Plan: for alerting and communicating with employees, emergency services, and other stakeholders during an emergency. List of emergency contacts.
- Inductions, training and drills.
- Resourcing to ensure fire extinguishers, first aid kits, and emergency equipment are readily available and functioning.

12.4 Flora and Fauna Management Plan

A Flora and Fauna Management Plan aims to avoid, minimise and manage the impact on local ecosystems, native flora and fauna and habitats.

The plan outlines how the construction (and operation) will be managed in accordance with Development Approval Conditions, Native Vegetation Approval Conditions and EPBC Approval Conditions.

12.5 Iron-grass Natural Temperate Grassland Threatened Ecological Community Management Plan

The INTG Management Plan highlights the high-risk areas within the Project Area specific to the nationally (EPBC Act) listed TEC. Specific management actions are highlighted which aim to avoid and further minimise impact to this TEC.

12.6 Noise and Vibration Management Plan

The Noise and Vibration Management Plan aims to protect the health and well-being of workers and nearby communities, as well as to minimize disturbances to the environment. Key components include identifying potential sources of noise and vibration, assessing the associated risks, and implementing control measures such as sound barriers, equipment maintenance, and scheduling noisy activities during less sensitive times. The plan also outlines monitoring protocols to ensure compliance with relevant noise and vibration standards and to address any complaints promptly.

12.7 Operational Environmental Management Plan

The Operational Environmental Management Plan documents protocols for the abovementioned environmental aspects as they relate to operation of the wind farm, including objectives, management measures, monitoring and reporting, and roles and responsibilities.

12.8 Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis*) Management Plan

The PBTL Management Plan highlights the specific procedures in place to protect, avoid and minimise impact to the nationally listed (EPBC Act) Endangered PBTL and PBTL habitat within the Project Area. This includes specific legislative approvals as they relate to this protected species. The PBLT MP includes a micro siting procedure specific to PBTL and a Relocation Procedure.

A separate Translocation Plan will be developed if this methodology is later determined to be required for GNWF.

12.9 Rehabilitation Management Plan

The Rehabilitation Management Plan identifies and addresses relevant issues for rehabilitation of temporary impacts following construction. The plan will include methodology to undertake the rehabilitation and any monitoring requirements. A rehabilitation plan specific to INTG is included within the INTG MP and includes a monitoring program.

12.10 Soil Erosion and Drainage Management Plan

The Soil Erosion and Drainage Management Plan details strategies to manage potential stormwater quantity and quality impacts caused by wind farm development as well as reasonable and practicable measures required to prevent soil loss, reduce sedimentation into nearby water bodies and effectively manage the modified landscape, in accordance with regulatory requirements. It will also include a review of natural flow paths on the existing site, a description of preliminary hydrological studies and recommendations, identification of potential impacts from the development, and a conceptual design of appropriate stormwater management measures.

12.11 Waste Management Plan

The Waste Management Plan identifies the types and quantities of waste expected to be generated during construction and details procedures for managing different types of waste in an environmentally responsible manner, guidelines for storage and handling of different types of waste, monitoring and reporting requirements, and education resources.

12.12 Wombat Management Plan

The Wombat Management Plan for Southern Hairy-nosed Wombat prioritises humane management methods and ensures compliance with relevant laws when undertaking construction related activities which may impact wombats or wombat burrows.

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Appendix A

Development Approval

Appendix B

EPBC Approval

Appendix C

Native Vegetation Clearance Approval

Appendix D

Environmental Studies and Associated Reports

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Technical Investigation Type	Associated Works Including Reports	Year	Reference
Noise	Goyder North Wind Farm: Environmental Noise Assessment	November 2023	(Echo Acoustic Consulting, 2023)
	Goyder North Renewable Energy Facility – BESS: Environmental Noise Assessment	March 2024	(Echo Acoustic Consulting, 2024)
	Goyder North Wind Farm: Environmental Noise Assessment. Updated spatial modelling to reflect revised 99 WTG layout.	July 2025	Echo (2025)
Visual amenity	Goyder North Renewable Energy Facility: Visual Assessment	April 2024	Goyder North Renewable Energy Facility: Visual Assessment
Shadow flicker and blade glint	Goyder North Renewable Energy Facility: Shadow Flicker and Blade Glint Assessment	March 2024	Goyder North Renewable Energy Facility: Shadow Flicker and Blade Glint Assessment
	Goyder North Renewable Energy Facility, Shadow Flicker and Blade Glint Assessment. Updated spatial modelling data to reflect revised 99 WTG layout (January 2025).	January 2025	(GHD, 2024)
	Goyder South Wind Farm: Preliminary Study on the Impact of Shadow Flicker, Noise and Vibration on PTBL and Burrowing Spiders	2025	(Umwelt, 2025a)
Ecological Studies for Flora and Fauna	Mt Cone Wind Farm Flora and Fauna Assessment - Investec	October – November 2010	EBS (2011)
	Mt Cone Wind Farm EPBC Referral -Investec	May 2011	NA
	Mt Cone Targeted PBTL Surveys -Investec	April-May 2012	EBS (2012)
	Goyder Renewables Zone – Goyder 2 (Mount Cone Wind, Solar and Storage)	2019	EBS (2019)
	GNREF on-ground flora assessment (GNREF excl OTL)	November 2022	EBS (2022 - unpublished)
	GNREF Desktop Flora and Fauna Assessment for OTL Options	July 2023	(EBS Ecology, 2023a)
	GNREF Ecological constraints mapping	July 2023	(EBS Ecology, 2023b)

Technical Investigation Type	Associated Works Including Reports	Year	Reference
	GNREF and OTL Ecological Risk Assessment Summary	September 2023	(EBS Ecology, 2023c)
	GNWF on-ground flora assessment	November 2023	(EBS Ecology, 2024a) now superseded, replaced by (Umwelt, 2025b)
	GNWF (WF) spring bird and bat utilisation survey (BBUS) (1 of 8)	November 2023	(EBS Ecology, 2024b)
	GNWF targeted Mallee Bird Community (MBC) surveys	November 2023	(Umwelt, 2025b)
	GNWF targeted Mallee Bird Community (MBC) surveys	February 2024	(Umwelt, 2025b)
	GNWF targeted Pygmy Blue-tongue Lizard (PBTL) surveys	February – March 2024	(Umwelt, 2025h)
	GNWF targeted EPBC listed threatened plant surveys (GNWF, OTL)	March 2024	(EBS Ecology, 2024a) now superseded, replaced by (Umwelt, 2025b)
	GNWF on-ground flora assessment (OTL, WF, site access options)	February – March 2024	(EBS Ecology, 2024a) now superseded, replaced by (Umwelt, 2025b)
	GNWF (WF) summer BBUS surveys (2 of 8)	February 2024	(EBS Ecology, 2024c)
	GNWF (WF) autumn BBUS surveys (3 of 8)	May 2024	(EBS Ecology, 2024d)
	GNWF (WF) winter BBUS surveys (4 of 8)	July 2024	(EBS Ecology, 2024e)
	Significant Impact Assessment for Goyder North Renewable Energy Facility	July 2024	Lathwida (2025)
	GNWF (WF) spring BBUS surveys (5 of 8)	September 2024	(Umwelt (Australia) Pty Ltd, 2024a)

Technical Investigation Type	Associated Works Including Reports	Year	Reference
	GNWF on ground flora assessment for design update	September 2024	Umwelt (NA)
	On ground targeted INTG Condition Class Assessment	October 2024	(Umwelt, 2025c)
	GNWF Native Vegetation Clearance Data Report for Geotechnical Investigations	August 2024	(Umwelt, 2024b)
	Significant Impact Assessment for Geotechnical Investigations	December 2024	(Umwelt, 2025d)
	GNWF (WF) summer BBUS surveys (6 of 8)	February 2024	(Umwelt, 2025e)
	GNWF Native Vegetation Clearance Data Report	February 2025	(Umwelt, 2025f)
	GNWF Targeted Flinders Ranges Worm Lizard Survey Report	March 2025	(Umwelt, 2025g)
	GNWF Targeted PBTL Survey	April 2025	(Umwelt, 2025h)
	GNWF Targeted Threatened Flora Survey (OTL)	May 2025	(Umwelt, 2025b)
	GNWF (WF) Autumn BBUS surveys (7 of 8)	May 2025	Umwelt, in draft
	GNWF (WF) Winter BBUS surveys (8 of 8)	July 2025	Umwelt, in draft
Heritage	Goyder North Renewable Energy Facility: Heritage Impact Assessment	October 2024	(Biosis, 2024)
	Goyder North Wind Farm & OHL Transmission Route – Heritage Desktop Assessment Summary	January 2024	(IHC, 2024)
Aeronautical impact assessment	Goyder North Wind Farm: Aeronautical Impact Assessment including Aviation Impact Statement, Qualitative Risk Assessment and Obstacle Lighting Review	December 2023	(Chiron Aviation Consultants, 2023)
Electromagnetic interference impact assessment	Goyder North Wind Farm: Electromagnetic Interference Assessment	January 2024	(GHD, 2024)
Traffic impact assessment	Goyder North Renewable Energy Facility: Traffic Impact Assessment	December 2024	(Jacobs, 2024)

Technical Investigation Type	Associated Works Including Reports	Year	Reference
	Goyder North Renewable Energy Facility: revised Access Regime Assessment	April 2025	(Jacobs, 2025)
Flood modelling	Goyder North Wind Farm: Flood Modelling	November 2023	(WGA, 2023)
Contaminated lands assessment	Goyder Renewables Zone, Goyder North: Preliminary Environmental Site Assessment	July 2023	(Agon Environmental, 2023)

Appendix E

Neoen Health Safety and Environmental Policy

Neoen HEALTH, SAFETY & ENVIRONMENTAL (HS&E) POLICY

Neoen is committed to provide a healthy and safe working environment for its employees, guarantee the integrity of the company's assets and protect the environment.

At Neoen, we believe:

- All accidents and damages to the employees, contractors, customers, off-takers, visitors, property, the environment and surrounding communities can be avoided and we will undertake all appropriate measures with the goal of eliminating all of them.
- Health, Safety and Environmental management is a daily individual and team responsibility.
- Each company member must be dedicated to conduct all required activities in order to develop the proper attitudes and practices, with the greatest concern for employees' health & safety , the environment and local communities.
- All of us should actively contribute to HS&E programs during the development, construction and operation of Neoen's assets, and seek to achieve an accident free work environment for Neoen employees, its customers and its contractors.

Accordingly, Neoen is committed to:

- Meeting or exceeding all applicable Health, Safety & Environmental laws or regulations.
- Pursue the objective of no harm to people, the company's assets and no damage to the environment or the local communities.
- Minimize adverse impacts of our activities to the environment and the ecosystem , optimize the social impact to the communities in the surrounding of Neoen's facilities, and preserve the local cultural heritage.
- Taking actions to prevent pollution and promoting the sustainability of the natural resources that we use.
- Manage the HS&E matters as any other critical business activity in the company, with a continuous performance improvement mindset.
- Provide guidance, support and training to our personnel and contractors in order to create and maintain a best in class HS&E culture.

Xavier Barbaro
CEO

Appendix F

Contractor Environmental Policy

umwelt