Goyder North Wind Farm

Iron-grass Natural Temperate Grassland Threatened Ecological Community Management Plan

Draft

December 2025

umwelt

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Threatened Ecological Community
Management Plan

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Prepared by
Umwelt (Australia) Pty Limited

On behalf of
Neoen Australia Pty Ltd

Project Director: Alison Derry
Project Manager: Jessica Skewes
Technical Director: Emma Tremain
Report No.: 31669/R10
Date: December 2025

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Acknowledgement of Country

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Document Status

Rev No.	Reviewer Name	Date	Approved for Issue Name	Date
V1.0	J. Carpenter	01/03/2024	A. Derry	04/03/2024
V1.1	A. Derry, H. Pocock, N. Bull, J. Skewes	04/07/2024	A. Derry	04/07/2024
V1.2	J. Skewes, I. Marshall, Dr M. Louter	06/06/2025	A. Derry	24/06/2025
V1.3	J. Skewes	20/08/2025	A. Derry	25/08/2025
V2	I. Marshall	27/08/2025	A. Derry	27/08/2025
V3	I. Marshall	09/12/2025	A. Derry	12/12/2025

Declaration of Accuracy

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth) (EPBC Act) make 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 Regulation 2000* (Commonwealth). 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 decision.

Signed: 

Full name: Hilary Pocock

Position: Project Manager - South Australia

Organisation: Neoen Australia Pty Ltd

EPBC Referral Number: EPBC 2024/09929

Name of Action Management Plan this document and declaration refers to:

Goyder North Wind Farm Iron-grass Natural Temperate Grassland TEC Management Plan

Date: 15/12/2025

Abbreviations

Abbreviation	Description
BAM	Bushland Assessment Methodology
BESS	Battery Energy Storage System
CEMP	Construction Environmental Management Plan
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Commonwealth)
DEW	Department of Environment and Water (South Australia)
EBS Ecology	Environment and Biodiversity Services Pty Ltd – trading as EBS Ecology (Now Umwelt)
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth)
EPC	Engineering, Procurement Contracts
GNWF	Goyder North Wind Farm Project (includes WF and OTL)
GNREF	Goyder North Renewable Energy Facility
GRZ	Goyder Renewables Zone
GS	Goyder South
GSS1	Goyder South Stage 1
GSHREP	Goyder South Hybrid Renewables Energy Project
ha	Hectare(s)
HSE Manager	Health, Safety and Environment Manager
INTG	Iron-grass Natural Temperate Grassland
IUCN	International Union for Conservation of Nature
km	Kilometre(s)
MNES	Matter(s) of National Environmental Significance
MW	Megawatts
MWh	Megawatt hour
Neoen	Neoen Australia Pty Ltd
NPW Act	*National Parks and Wildlife Act 1972* (South Australia)
NV Act	*Native Vegetation Act 1991* (South Australia)
NVC	Native Vegetation Council
OEMP	Operational Environmental Management Plan
OTL	Overhead Transmission Line
PTW	Permit to work
RAMP	Revised action management plan
SA	South Australia(n)
SEB	Significant Environmental Benefit
sp.	Species (singular)
spp.	Species (plural)
ssp.	Subspecies
TEC	Threatened Ecological Community
VA(s)	Vegetation Association(s)

Abbreviation	Description
WF	Wind Farm components, comprising boundary around the windfarm infrastructure components in GNWF
WTG(s)	Wind Turbine Generator(s)
<	Less than
>	More than
≤	Less than or equal to
≥	More than or equal to
%	Percent / percentage

Glossary

Terminology	Definition
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.
Declared Weed	A plant that is regulated under the *Landscape South Australia Act 2019* due to its threat to primary industry, the natural environment and public safety.
Department	The Australian Government agency responsible for administering the EPBC Act.
Development Envelope (DE)	A 'buffered' version of the Disturbance Footprint that represents the spatial extent within which the Disturbance Footprint is expected to occur.
Disturbance Footprint (DF)	The area where permanent and temporary infrastructure is proposed and the maximum spatial extent of vegetation clearance and/or earthworks to allow for construction of the GNWF.
Met mast	Meteorological mast (mast or tower equipped with instruments to measure windspeed and climatic conditions).
Micro-siting	Micro-siting is defined as a slight shift or adjustment of infrastructure components within the Development Envelope which may occur prior to construction works to further avoid or minimise impacts to MNES or other currently unknown project constraints, such as buried artefacts or remains which may not be discovered until civil works begin, or in the case of unacceptable geotechnical conditions in a given position.
Minister	The Australian Government Minister administering the EPBC Act including any delegate thereof.
New or increased impact	A new or increased environmental impact or risk relating to any protected matter, when compared to the likely impact of implementing the action management plan that has been approved by the Minister under conditions 3 and 4, including any subsequent revisions approved by the Minister, as outlined in the Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals, Commonwealth of Australia 2017.
Operation	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.
Plan(s)	Any of the documents required to be prepared, approved by the Minister, implemented by the approval holder and published on the website in accordance with the EPBC Act approval (2024) conditions (includes action management plans and/or strategies).
Project	The GNWF Project, inclusive of Wind Turbine Generators (WTG), overhead power transmission line (OTL), expansion of existing Bundey substation, on-site battery energy storage systems (BESS), access tracks and temporary facilities and infrastructure to enable construction. The Project is part of the larger Goyder North Renewable Energy Facility which includes a future stage of development which is not yet defined.
Project Area	All Project components within GNWF including WF and OTL.
Project components	Includes boundaries of GNREF, GNWF, Development Envelope, Disturbance Footprint and Search Area.

Terminology	Definition
Project elements	Distinct functional elements of the GNWF Project including WF, OTL and Site Access.
Search Area	A buffer of 5 km around GNREF applied to all database searches and desktop study.
Significant Impact(s)	Impacts which are important, notable, or of consequence, having regard to their context or intensity, and assessed within the framework of the Matters of National Environmental Significance – Significant Impact Guidelines 1.1, Commonwealth of Australia 2013.

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Appendices

1.0 Introduction

Neoen Australia Pty Ltd (Neoen) is developing the Goyder Renewables Zone (GRZ) (**Figure 1.1**), a highly efficient energy generation project, with world class wind resources and strong external support demonstrated by it being declared the only wind generation Priority Project in South Australia and being awarded a Capacity Investment Scheme contract by DCCEEW. The GRZ is ideally located to complement Project EnergyConnect, a large transmission line interconnector between South Australia (SA) and New South Wales (NSW) currently under construction by ElectraNet (in SA) and TransGrid (in NSW).

The broader GRZ includes the Goyder South Hybrid Renewables Energy Project (Development Approval granted in 2021, with Goyder South Stage 1 (GSS1) currently under construction) (GS; GSHREP) and the Goyder North Renewable Energy Facility (GNREF).

The GNREF Project Area is located north-east of Burra and east of the Mount Bryan township in the Goyder Regional Council area, approximately 150 kilometres (km) north of Adelaide, South Australia. Planning consent was achieved for the GNREF in 2024. Since the Planning consent was achieved, Neoen is progressing a refined the design for up to 600 Megawatts (MW) of wind generation and 225 MW/ 900 megawatt hours (MWh) of Battery Energy Storage System (BESS), located in the southern portion of the GNREF, titled Goyder North Wind Farm Project (GNWF; The Project), which has a proposed Disturbance Footprint of approximately 536.82 hectares (ha). Neoen has no current plan to develop further stages and should further stages be progressed in the future they would be subject to their own approval processes and stakeholder engagement.

This Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community (INTG TEC) Management Plan has been prepared for the GNWF Project to outline the likely direct and potential indirect impacts to the INTG TEC during construction and operation of the Project, and the proposed management measures that will be implemented to avoid, minimise and/or mitigate them.

This INTG Management Plan must be read and implemented in conjunction with the Goyder North Wind Farm Construction Environmental Management Plan (CEMP) (*in draft*), which is referred to as the CEMP, as well as the Goyder North Wind Farm the Operational Environmental Management Plan (OEMP), to be prepared prior to commissioning completion of the GNWF, and any sub-plans prepared as part of the CEMP and / or OEMP.

Furthermore, and in accordance with specific conditions of approval associated with the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approvals obtained for the Project from the Department of Climate Change, Energy, the Environment and Water (DCCEEW; the Department), this INTG Management Plan is required to be implemented for the duration of the EPBC Act approval, or the life of the Project. More information on the EPBC Act approval obtained for the Project is provided in the following section, while more information on the specific conditions of the EPBC Act approval and compliance is provided in **Section 2.0**.

1.1 Overview of the Goyder North Wind Farm Project

GNWF incorporates the southern two thirds of the GNREF Project Area and includes an Overhead Transmission Line (OTL) traversing approximately 48 km south-east, where it connects to the existing Bundey Substation (**Figure 1.2**). GNWF is comprised of:

- Up to 99 WTGs with a total nameplate capacity of up to 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 (one or two 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.
- One 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.

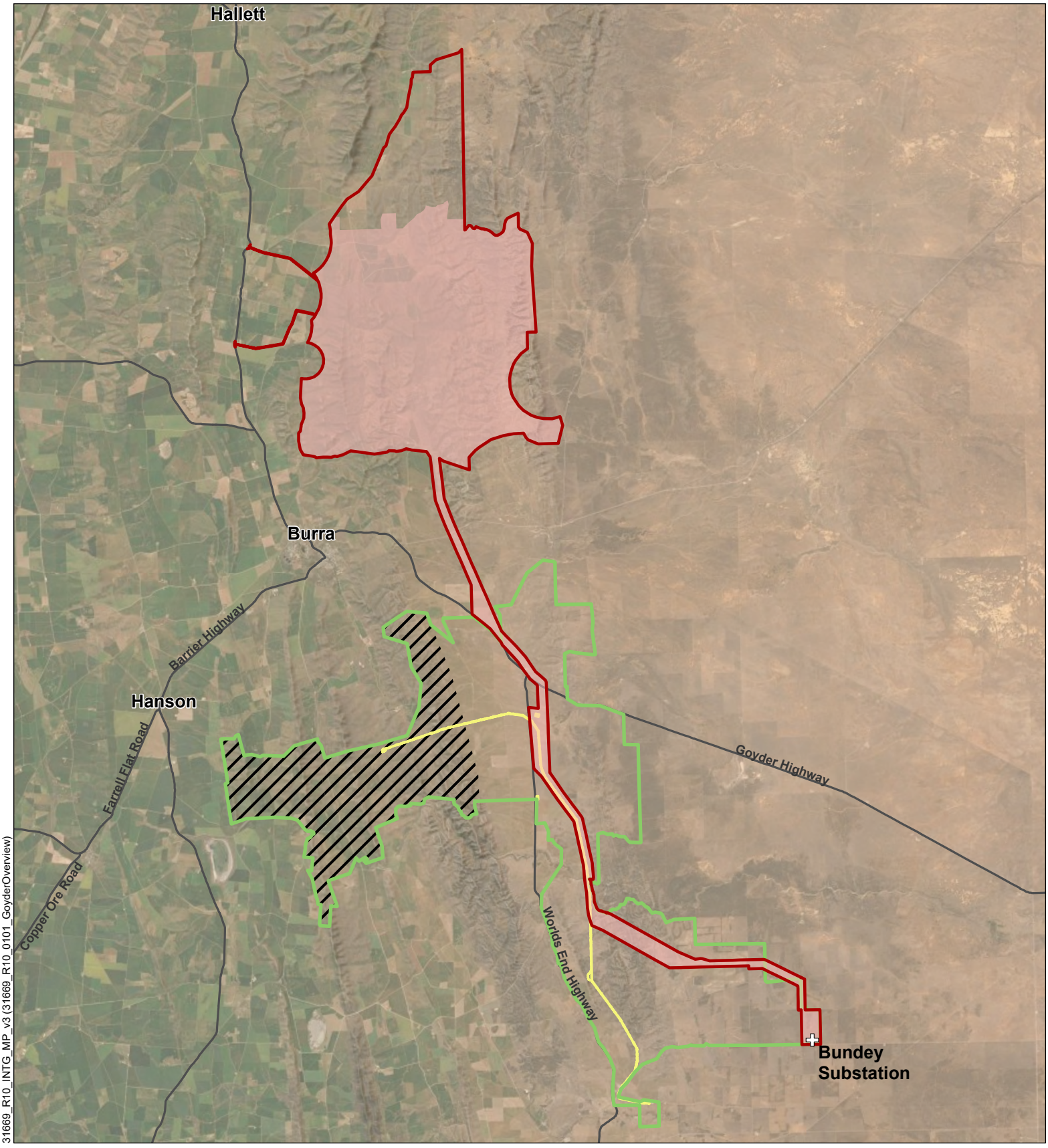
This Plan relates to GNWF, which is currently under development. If any subsequent future stages were proposed to be developed, a separate Management Plan would be developed and implemented, if applicable. An overview of the Project along with the corresponding EPBC approval sought and obtained is outlined in **Table 1.1**.

INTG TEC will be impacted by the GNWF Project. As such, this INTG Management Plan has been prepared to outline the likely and potential direct and indirect impacts to INTG TEC during construction and operation of the GNWF, and the proposed management measures that will be implemented to avoid, minimise and / or mitigate them.

Table 1.1 EPBC Approval Details for the GNWF Project

Proposed Action	Legal Entity	EPBC Referral Reference	EPBC Referral Decision	Date EPBC Approval Achieved
GNWF (up to 99 WTGs and associated infrastructure)	TBC	EPBC2024/09929	Controlled Action	Pending Approval

Figure 1.1 Overview of GRZ including GS and GNWF



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: 21/08/2025 10:58 AM
Created by: sophie.haswell

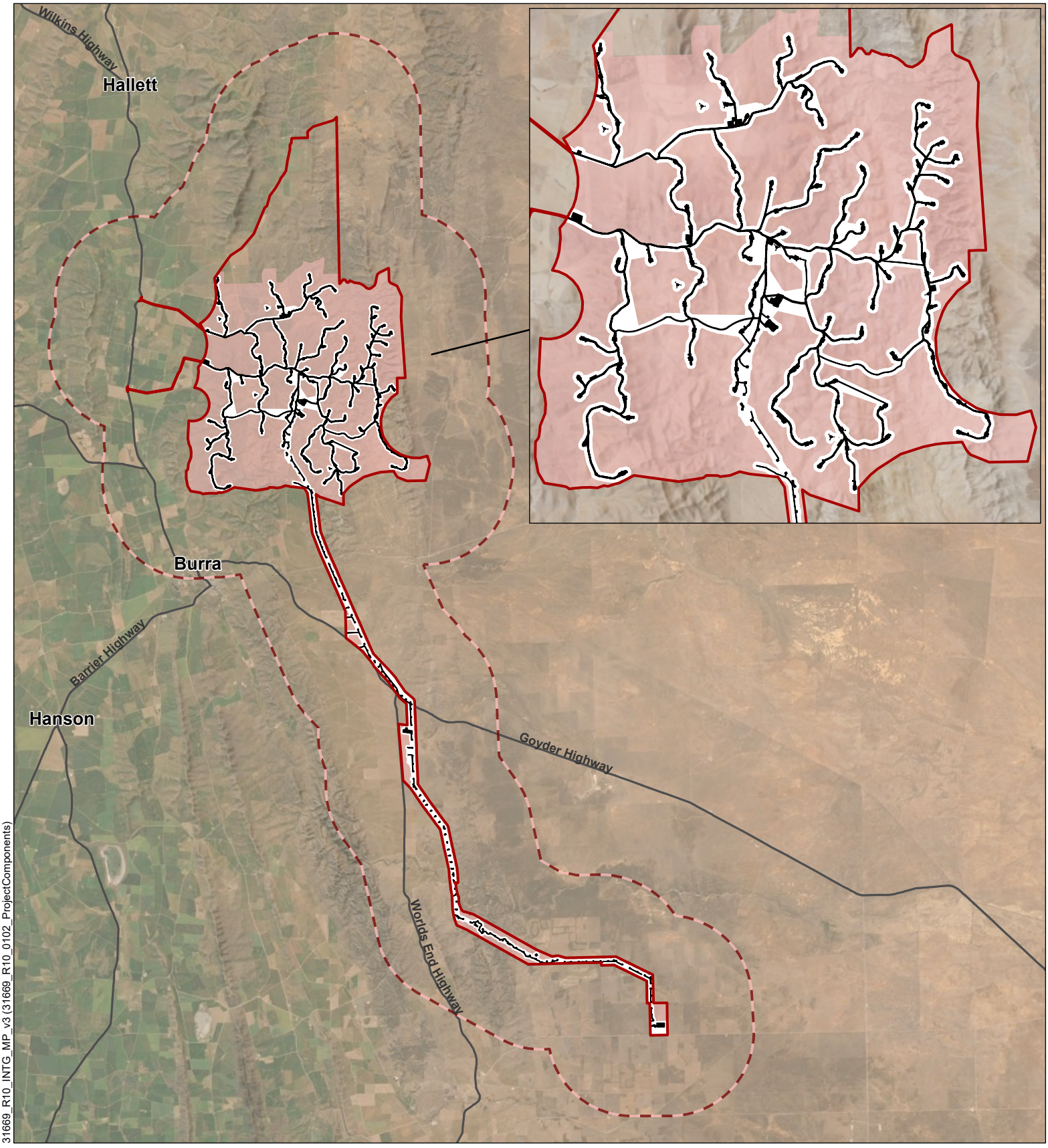
GDA2020 MGA Zone 54

N

0 2.5 5 km

31669_R10_INTG_MP_v3 (31669_R10_0101_GoyderOverview)

Figure 1.2 Location and Infrastructure Components of the GNWF Project Including WF and OTL



Search Area
GNWF
GNREF
Development Envelope
Disturbance Footprint

31669_R10_INTG_MP_v3 (31669_R10_0102_ProjectComponents)

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 21/08/2025 10:58 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

0 2.5 5 km

N

1.1.1 Description of the Environment

The GNWF Project Area comprises approximately 17,700 ha of land (private freehold and crown land). The area is characterized by world-class wind resources and complementary land uses comprising primarily of marginal grazing land for sheep and cattle, and some dryland cropping. The Project Area is dominated by ridges with occasional rocky outcrops, which fall away to low foot slopes and undulating hills, dissected by eroded drainage gullies. The Wind Farm is within the Wandalla Land System, characterised by moderately steep to steep range hills north of Burra and associated outwash fans, grading to lower hills, slopes and low rises in the north (DEWNR undated(a)). Rainfall averages 300-425 mm annually across the land system. Drainage from the range is mostly to the west and east. Elevation in this Land System is from 460 m above sea level in the southeast, to 789 m at Mount Cone (centre). Soils are often shallow and of moderately low fertility, with rocky outcrops common.

A total of 23 broad native Vegetation Associations (VAs) have been mapped and surveyed across the Project Area in which up to 267 species of native plants have been identified (including some identified to only to Genus). Native vegetation throughout the Project Area is comprised predominantly of grasslands, with large tracts of Iron-grass (Lomandra spp.) in the central and eastern sections of GNWF. Remnant mallee woodland associations occur along the eastern side of the site, where they grade into chenopod dominated plains within the eastern rain shadow. The OTL traverses a variety of landscapes, and includes native vegetation including Austrostipa grassland, Lomandra grassland, Chenopod shrubland, and Mallee woodland.

Vegetation within the Project Area comprise a large contiguous patchwork of native vegetation bounding Goyder's Line, which demarcates the portion of the state where rainfall is unpredictable, and land therefore deemed unsuitable for cropping. As such there are very few gaps in the native vegetation coverage across the Project Area, and remnant woodland remains. It is likely that some areas of grassland and shrubland historically contained mallee vegetation, which has been cleared, however grazing has been the primary impact in this location, including of sheep and cattle as well as unmanaged populations of feral goats and native herbivores such as kangaroos. Grazing impacts vary across the site and includes species form and composition changes, limited regeneration of woody shrubs and trees and bare patches from resting animals.

Grasslands within the Project Area have a long history of grazing, and are predominantly in poor to fair condition, mapped as native grassland if more than (>) 5 % of the vegetation was considered to comprise native grasses, otherwise mapped as exotic grassland or cropped. Some clearance of woodland vegetation (Mallee and Eucalyptus leucoxylon +/- E. odorata woodland) is likely to have preceded, with the remaining areas considered derived grasslands.

Mallee woodland and chenopod shrublands have also been heavily grazed, acting predominantly as shelter areas for livestock and feral goats, as well as foraging areas when grassland conditions are poor. As a result, many mallee vegetation patches lack a diverse understorey shrub and forb component and have large bare patches under trees as a result of livestock resting. In some areas, chenopod shrublands have been heavily grazed, with visible livestock trails throughout and modified branches on shrubs.

Other vegetation includes planted amenity (such as windrows and gardens), agricultural cropped areas, exotic grasslands (comprising less than 5% native cover), and existing cleared areas such as roads or other infrastructure.

1.1.2 Relevant Project Terminology and Definitions

Several project specific terminology and abbreviations are referred to repeatedly throughout the report. Project boundaries components are described below in **Table 1.2**.

Table 1.2 Project Specific Terminology and Abbreviations

Term	Abbreviation	Description
Goyder North Renewable Energy Facility	GNREF	The broader area for which Planning Consent was granted in October 2024 which bounds the direct wind farm infrastructure of access roads and WTGs, which includes GNWF as well as the OTL 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 currently proposed for development and is the focus of this assessment and management plan. Includes all wind generation infrastructure (generating up to 600 MW) and associated infrastructure, including access roads, underground cables, substations, OTL, construction and operation compounds and met masts, required to transmit and connect into the 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.
Development Envelope	DE	A 'buffered' version of the Disturbance Footprint that represents the outer spatial extents within which the Disturbance Footprint will occur. Design is well developed and optimised to minimise cut and fill, avoid known sites 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 naming conventions and related Project Area boundaries of GNWF have evolved throughout the design and approval process, with various supporting documents referring to the Project as Goyder North Renewable Energy Facility Stage 1, Goyder North Stage 1 (GN1) and Goyder North Wind Farm Stage 1 and Stage 2. With no further stages currently planned beyond the 99-turbine configuration, the Project is hereafter referred to as Goyder North Wind Farm Project (GNWF, the Project).

1.1.3 Relevant Previous Reports

The following reports and documentation should be referred to for important background and supporting information:

- Goyder North - Ecological Constraints Mapping (EBS Ecology 2023a);
- Goyder North Renewable Energy Facility and Overhead Transmission Line Risk Assessment Summary - (EBS Ecology 2023b);

- Goyder North Stage 1 and Stage 2 Wind Farm Native Vegetation Clearance Data Report (Umwelt 2025a);
- Goyder North Wind Farm Iron-grass Natural Temperate Grassland Threatened Ecological Community Assessment (Umwelt 2025b); and
- Goyder North Wind Farm Ecological Assessment Report (Umwelt 2025c).

1.2 Purpose and Objectives

1.2.1 Purpose

This INTG Management Plan has been prepared by Umwelt on behalf of Neoen. This INTG Management Plan applies to construction and operation activities carried out for GNWF and has been prepared as a sub-plan of the CEMP (Umwelt 2025 – in draft) and OEMP (to be adapted).

1.2.2 Objectives

The objectives of this INTG Management Plan (**Table 1.3**) are to:

- Provide ecological community profile information on the INTG TEC.
- Provide information on the location of INTG TEC within GNWF.
- Provide measures to avoid, minimise and mitigate adverse environmental impacts to INTG TEC during construction and operation phases of GNWF.
- Provide measures to improve likelihood of rehabilitation success in areas of temporary clearance.
- Satisfy regulatory requirements and approval conditions.

To fulfil these objectives for the GNWF this INTG Management Plan will:

- Outline measures which ensure that there is no disturbance to INTG TEC outside of the designated (and approved) Disturbance Footprint.
- Outline measures to ensure the disturbance and impact of works on INTG TEC is strictly limited to only that which is critical for the construction and operations of the project.
- Outline measures that ensure that micro-siting does not result in additional disturbance to INTG TEC above the approved disturbance limits specified in the EPBC Approval Conditions and Native Vegetation Approval Conditions (2025/3089/422).
- Outline a monitoring program to report on success of rehabilitation in areas of temporary clearance.

Neoen is committed to implementing the INTG Management Plan during construction and operation for the life of the Project, per the EPBC Act approval conditions. A table of commitments to achieve the above objectives and a reference to where the commitments are detailed in this INTG Management Plan is provided in **Table 1.3**. Neoen will not commence construction or operation until the INTG Management Plan has been approved in writing by the Australian Government Minister administering the EPBC Act, in writing.

Table 1.3 Commitments to Aachieve the Oobjectives of the INTG Managament Plan

Objectives	Commitment	Reference (Linked)
Provide profile information on INTG TEC.	Profile information on INTG is provided in this INTG Management Plan.	**Section 3.0**
Provide information on the location of INTG TEC within GNWF.	This INTG Management Plan will be kept current with the location of INTG TEC within GNWF, if found within the GNWF Project Area post-EPBC Act approvals.	**Section 3.0**
Avoid and minimise impacts to INTG TEC during construction and operation phases of the GNWF Project.	Neoen is committed to avoiding and minimising impacts on INTG during pre-construction, construction and operation phases of the GNWF Project. This plan will be revised to include new information on the avoidance and minimization measures applied to INTG within the GNWF during construction.	**Section 4.0** **Section 9.0** **Section 10.0**
Ensure that there is no disturbance to INTG outside of the Disturbance Footprint, and to ensure the disturbance and impact of works on INTG TEC is strictly limited to only that which is critical for the construction and operations of the project.	Neoen is committed to ensuring that there is no disturbance to INTG outside of the Disturbance Footprint via implementation of this INTG Management Plan, including specific management targets, performance indicators and triggers, construction and operation management measures.	**Section 6.3** **Section 8.0** **Section 9.0** **Section 10.0** **Section 11.0**
Ensure that micro-siting within the Development Envelope does not result in additional disturbance to INTG TEC outside of the approved disturbance limits.	Infrastructure will not be micro-sited if it does not result in a reduction of potential impacts to INTG and Neoen commits that micro-siting will not increase impacts to INTG TEC or other MNES (for example INTG and/or INTG habitat).	**Section 8.0**
Outline a monitoring program to report on the success of rehabilitation in areas of temporary clearance.	Neoen is committed to the rehabilitation of INTG in areas of temporary clearance which is outlined in **Section 11.0**.	**Section 11.0**

2.0 Compliance

This INTG Management Plan has been prepared by Umwelt in accordance with the relevant legislation, policies and guidelines summarised in **Table 2.1**. Relevant Approval Conditions for the GNWF in relation to the EPBC Act and NV Act are outlined in **Table 2.2** and **Table 2.3**.

Table 2.1 Relevant Legislation, Policies and Guidelines

Jurisdiction	Legislation, Policies and Guidelines
Commonwealth	*Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Conditions of approval under the EPBC Act are listed in **Table 2.2**.
	National Recovery Plan for the Iron-grass Natural Temperate Grassland of South Australia ecological community (Turner 2012).
	Approved Conservation Advice for Iron Grass Natural Temperate Grassland of South Australia (DEWHA 2008).
	Environmental Management Plan Guidelines, Commonwealth of Australia (DCCEEW 2024).
	EPBC Act Policy Statement 3.7: Nationally Threatened Species and Ecological Communities Peppermint Box (*Eucalyptus odorata*) Grassy Woodland of South Australia and Iron Grass Natural Temperate Grassland of South Australia (DEWR 2007).
	Commonwealth Listing Advice on Iron-grass Natural Temperate Grassland of South Australia (Threatened Species Scientific Committee 2007).
	Farming and Nationally Protected Iron-grass Natural Temperate Grassland (DSEWPaC 2011).
State (South Australia)	*Planning, Development and Infrastructure Act 2016* (PDI Act). Development Approval (Application ID: 23036148) received on 28 October 2024
	Native Vegetation Act 1991 (NV Act) and associated Native Vegetation Regulations 2017.
	An application to the Native Vegetation Council (NVC) for clearance of native vegetation associated with the GNWF construction is currently with the NVC.
	National Parks and Wildlife Act 1972 (NPW Act).
	Hydrogen and Renewable Energy Act 2023.
Local	There are no relevant local policies, legislation, guidelines and approval conditions as of July 2024.

[Placeholder – tables to be updated in final]

Table 2.2 Relevant Conditions of Approval to INTG TEC Received as Part of the EPBC Approval

Condition Number	Approval Condition Description	How Addressed	Where Addressed - Relevant Section in this Report

Table 2.3 Relevant Conditions of Approval to INTG TEC Received as Part of the NV Act Approval (2025/3089/422)

Condition Number	Approval Condition Description	Relevant Section in This Report
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.	**Sections 7.0**, **9.0** and **10.0**.
2	No clearance to occur, with the exception of with geotechnical investigations, until Development Approval has been obtained under the *Planning, Development and Infrastructure Act 2016* (including Building Rules Consent where required) or a Renewable Energy Infrastructure Licence under the *Hydrogen and Renewable Energy Act 2023* has been granted.	**Sections 7.0**, **9.0** and **10.0**.
3	Prior to clearance commencing, the applicant must clearly identify and indicate the areas approved for clearance using spatial mapping of the approved disturbance footprint as a minimum. Physical markers (markings, 3 barriers, pegs, flags or temporary fencing) may be used in addition where practicable, that are to remain in place, in good condition and clearly visible for the period in which clearance is occurring.	**Sections 7.0**, **9.0** and **10.0**.

Condition Number	Approval Condition Description	Relevant Section in This Report
4	Prior to clearance commencing, the applicant must identify and indicate any environmental no-go areas, including Iron-grass Natural Temperate Grasslands (INTG), using spatial mapping as a minimum. Physical markers (markings, barriers, pegs, flags or temporary fencing) may be used in addition where practicable that are to remain in place, in good condition and clearly visible for the period in which clearance is occurring.	**Sections 7.0**, **9.0** and **10.0**.
11	The Iron-grass Natural Temperate Grasslands (INTG) temporarily disturbed vegetation in the project area will be rehabilitated across the site, as detailed in the approved INTG Management Plan and Construction Environmental Management Plan (CEMP).	**Sections 7.0**, **9.0** and **10.0**.
13	No clearance is to occur until the attached form, "Decision Notification Acknowledgement", is signed and returned to confirm that the applicant and anyone else who is a party to the agreement, understand and will comply with the decision, including all the associated conditions.	**Sections 7.0**, **9.0** and **10.0**.

3.0 INTG TEC Profile

3.1 Conservation Status

INTG TEC (**Photo 3.1**) is listed as Critically Endangered under the EPBC Act and Endangered under the South Australian NPW Act. These classifications are consistent with the International Union for Conservation of Nature criteria for listing species on the IUCN Red List System (IUCN Species Survival Commission 2012).

Photo 3.1 INTG Class B Lomandra Grassland in the GN1 Project Area

Photo by EBS Ecology, 2022

3.2 Ecology and Biology

3.2.1 Description

INTG TEC is classified as a natural grassland dominated by tussock forming perennial grasses and iron-grasses (*Lomandra effusa* or *Lomandra multiflora* ssp. *dura*). Between 10% and 70% of the ground cover is covered by *Lomandra* ssp. with a range of herbaceous plant species in the inter-tussock spaces, and an absence (<10% cover) of trees or shrubs (Turner, 2012). The terms 'Lomandra Grassland' and 'Iron-grass Grassland' are used interchangeably for this ecological community, however 'INTG' typically refers to the listed TEC, whilst Lomandra Grassland refers to the general community in all its forms, regardless of condition.

The TEC is unique as it is the only recognised temperate grassland community dominated by tussock-forming species that are not true grasses, and the only location where Lomandra species occur in sufficient density to form a dominant stratum (Turner, 2012). Lomandra species are members of the Liliaceae family.

The floristic composition of INTG includes characteristic iron-grasses in addition to perennial native grasses such as *Aristida behriana*, *Austrostipa* spp., *Rytidosperma* spp. and others. The inter-tussock spaces are filled with herbaceous species which may only be visible seasonally, such as *Arthropodium strictum* (Chocolate Lily), *Bulbine bulbosa* (Bulbine Lily), *Calocephalus citreus* (Lemon Beauty-heads), *Eryngium* spp. (Blue Devil), *Goodenia* spp., *Vittadinia* spp. *Wahlenbergia* spp. (Bluebells) and others. Shrubs form a minor component of some INTG communities, and may include *Bursaria spinosa* (Sweet Bursaria), *Cryptandra amara* spp. (Long-flower Cryptandra), *Enchylaena tomentosa* (Ruby Saltbush) and others (DEWR, 2007).

A number of threatened flora and fauna species are associated with the INTG TEC including Flinders Ranges Worm-lizard (*Aprasia pseudopulchella*), Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis;* INTG), *Cullen parvum* (Small Scurf-pea), *Dodonaea procumbens* (Trailing Hop-bush) (Threatened Species Scientific Committee, 2007).

Remaining remnants of Iron-grass grassland generally occur on gentle slopes of low hills approximately 380 m above sea level and predominantly on loams to clay-loams with an estimated clay content of 30–35 % (DEWR, 2007).

3.2.1.1 INTG TEC Condition Class

The Iron-grass listing criteria (DEWR, 2007) facilitates classification of Iron-grass Natural Temperate Grassland into condition classes based on native plant species diversity, composition, and native perennial tussock density. Three Condition Class categories have been defined, representing high quality remnants (Class A), moderate quality remnants (Class B) and degraded remnants with potential for restoration (Class C) (**Figure 3.1**). An overview of the listing criteria for each Class is provided in **Table 3.1**. Class A and Class B are listed and protected under the EPBC Act, while Class C is not listed or protected, although is considered 'amenable to rehabilitation'.

Table 3.1 Condition Classes for INTG TEC (Turner 2012)

Condition Class	Minimum Patch Size (ha)	Diversity of Native Plant Species	No. of Broad-Leaved Herbaceous Species in Addition to Identified Disturbance Resistant Species	No. of Native Perennial Grass Species	Tussock Count
Listed ecological community (protected by the EPBC Act)					
A	≥ 0.1	> 30	≥ 10	≥ 5	≥ 1/m
B	≥ 0.25	> 15	≥ 3	≥ 4	≥ 1/m
Degraded patches amenable to rehabilitation (not the TEC and not protected by the EPBC Act)					
C		> 5	No minimum	≥ 1	No minimum

3.2.2 Historical and Current Distribution

The INTG TEC occurs only in SA, where tussock Grasslands dominated by *Lomandra effusa* and/or *Lomandra multiflora* subsp. *dura* occur predominantly in the Northern and Yorke Landscape Management Region, with smaller occurrences in the Murraylands and Riverland Landscape Management Region. Lomandra Grassland is most widespread in the Flinders-Lofty Block Bioregion (Neagle, 2008 in Turner, 2012), with smaller occurrences in the Kanmantoo, Eyre-Yorke Block and Murray Darling Depression Bioregions (Department for Environment and Heritage, 2005 in Turner, 2012).

The area of INTG at the time of European settlement has been estimated at between 750,000 to 1,000,000 ha (Specht, 1972; Hyde, 1995 in Turner, 2012). At the time of listing under the EPBC Act in 2007, the remaining area of INTG of any condition, including highly degraded remnants, was thought to be less than 50,000 ha (Department for Transport, Urban Planning and the Arts, 2000 in Turner, 2012), whilst the area meeting the criteria for the listed threatened ecological community is likely to be substantially less and may be less than 5,000 ha (Hyde, 1995; TSSC, 2007 in Turner, 2012).

3.3 Known and / or Potential Threats

The INTG TEC National Recovery Plan (Turner, 2012) documents known and potential threats to INTG TEC, along with known and/or potential impacts. Note, that not all threats documented in the INTG TEC National Recovery Plan are necessarily relevant to the GNWF Project.

All INTG TEC patches within the Project Area are potentially at risk from the known and potential threats summarised in **Table 3.2** (Turner 2012). These threats are expected to pose a greater risk in areas located in close proximity to the disturbance footprint (i.e. up to 200m).

Table 3.2 Known and Potential Threats to INTG and Associated Impacts (Adapted from Turner, 2012)

Known and/or Potential Threat	Known and/or Potential Impact
Lack of awareness	Lack of specific knowledge about the Iron-grass Natural Temperate Grassland ecological community, its appearance, significance and ecological values.
	Lack of awareness/knowledge of appropriate Iron-grass Natural Temperate Grassland management.
	View of native grasslands as low productivity, low value agricultural land requiring 'improvement'.
Changes in land use (including altered grazing regimes).	Incompatible grazing levels and disturbance by stock.
	Change of livestock species/breeds and stocking rates resulting in inappropriate grazing levels and disturbance.
	Complete removal of grazing may lead to increased weed growth and/or a reduction in inter-tussock spaces, which may impact foraging and basking opportunities.
	Intensification of activities (cropping in new areas, pasture improvement, handfeeding or establishment of feed-lots, new water supply/dams for irrigation).
	New industries displacing the ecological community (horticulture, agroforestry, apiary, carbon sequestration programs, revegetation).

Known and/or Potential Threat	Known and/or Potential Impact
	Inappropriate chemical application (herbicides, fertilizers, soil ameliorants).
Weed invasion	Competition for resources (space, nutrient, water).
	Increased dominance of existing weeds species.
	Introduction of new weed species.
	Incompatible weed control techniques (cultivation, chemical, off-target damage).
	Inappropriate choice of species composition and density for revegetation.
Exotic animals and overabundant native species	Overgrazing of grassland flora by exotic and native herbivores.
	Predation of grassland fauna by exotic carnivores (foxes, cats).
	Spread of exotic weeds by animal vectors (foxes, starling).
	Soil disturbance and poisoning of native fauna from inappropriate exotic animal control (rabbit warren destruction, spraying of locust/grassland plague).
New infrastructure and development	Infrastructure for energy and water supplies (buildings, wind generator networks, transmission line poles, underground power cables, pipelines, dams, bores).
	New roads or upgrading of existing roads (widening, re-surfacing).
	Infrastructure development in non-arable areas (sheds, roads, storage facilities).
Inappropriate fire regimes	Inappropriate or altered fire regimes.
	Lack of investigation/knowledge about grassland species response to fire.
	Inappropriate biomass management for fire prevention (slashing too frequently or too low to maintain and protect biodiversity assets).
	Damage to vegetation and soils from fire suppression activities (grading of fire breaks, vehicle access through remnants, application of chemical foam).
Ongoing ecological stresses due to past clearance, fragmentation and management changes	Incremental clearance and decline in condition of remnants.
	Isolation of remnant populations (barriers to dispersal, inbreeding, edge effects).
	Increased competition in remnant population (resources, mortality, loss of pollinators, loss of host plants or animals, disruption of critical life stages, vulnerability to stochastic events).
	Competition with new and existing weeds.
	Over-harvesting of native seeds from grassland remnants due to increased demands.
Climate change	Potential reduction in biomass production.
	Possible escalation of species stresses associated with a drying climate (increased competition for water and other resources, increased mortality, disruption to critical life stages, loss of pollinators, loss of host plants or animals).
	Social impacts on agricultural enterprises in lower rainfall areas (reduced management effort in INTG remnants to cut costs).
	Increased grazing intensity from failure to adapt 'best practice' grazing management strategy.

3.4 INTG TEC Occurrence in the Project Area

A total of 3,107.35 ha of vegetation was mapped as vegetation association (VA) 6: Lomandra Grassland in the broader GNREF. Within the GNWF Project Area, a total of 1,931.24 ha of VA6 was mapped, including 18.02 ha of Class A INTG, 1,480.07 ha of Class B INTG, and 307.63 ha of Class C INTG (**Table 3.3**). INTG was mapped predominantly in the WF (~1,792.07 ha), but also along the OTL (~139.17 ha).

Table 3.3 Occurrence of INTG Within the GNWF Project Area and Disturbance Footprint

INTG Class (A, B or C)	INTG TEC (Yes/No)	GNWF Project Area (ha)	GNREF Total (ha)	Impacted by DF (Yes/No)	DF (ha)	% of GNWF INTG Impacted
INTG Class A	Yes	18.02	18.02	No	0.00	0 .00
INTG Class B	Yes	1,480.07	1,923.32	Yes	6.14	0.42
INTG Class C	No	307.63	307.63	Yes	2.44	0.79
Unsurveyed Lomandra Grassland	-	125.51	858.38	No	0.00	0.00
Total Area of Lomandra Grassland in GNWF		**1,931.24**	**3,107.35**	**-**	**8.59**	**0.44**
Total Maximum TEC (includes Class A, B)		**1,498.09**	**1,941.34**	**-**	**8.59**	**0.41**

*Minor discrepancies in sum values are due to rounding.

INTG TEC surveys were undertaken in the optimal season, but due to the poor environmental conditions present at the time of the detailed vegetation surveys, patches of Lomandra Grassland were not assessed using criteria listed in the INTG TEC National Recovery Plan (Turner 2012). Indicators such as number of perennial grass species was difficult to assess, as grasses could not be distinguished to species level due to poor environmental conditions and factors such as heavy grazing impacts and in some areas, previous fire impacts. Native species diversity counts were not limited to a 50 x 50 m quadrat but assessed using the Bushland Assessment Methodology (BAM) in a 1-ha area. Despite the poor conditions, conditions at approximately half of the sites surveyed using BAM methodology were close to meeting the INTG Class B requirements.

Additional targeted surveys were undertaken in spring 2024, to assess the condition of patches of Lomandra Grassland which intersected with the Disturbance Footprint current at the time of the survey. A total of 23 sites were assessed for INTG condition class according to the criteria outlined in the Conservation Advice and INTG TEC National Recovery Plan.

A total of 72 native flora species and 41 introduced flora species were recorded within the 23 survey sites. One site was determined to be INTG Class A, 14 sites were determined to be INTG Class B, and the remaining 8 sites were determined to be INTG Class C.

One site (LOM12) was found not to meet the criteria for listing as INTG, as it did not contain a high enough coverage of *Lomandra* spp. (>10%). LOM22 was mapped as INTG Class C due to the high relative cover of *Lomandra* spp., however the site did not meet the typical structural description of the community, having high cover (>10%) of chenopod shrub species including *Maireana rohrlachii* and

Maireana brevifolia, with intermittent dense patches of *Hakea leucoptera*. Vegetation mapping for the Project Area was adjusted to incorporate these changes.

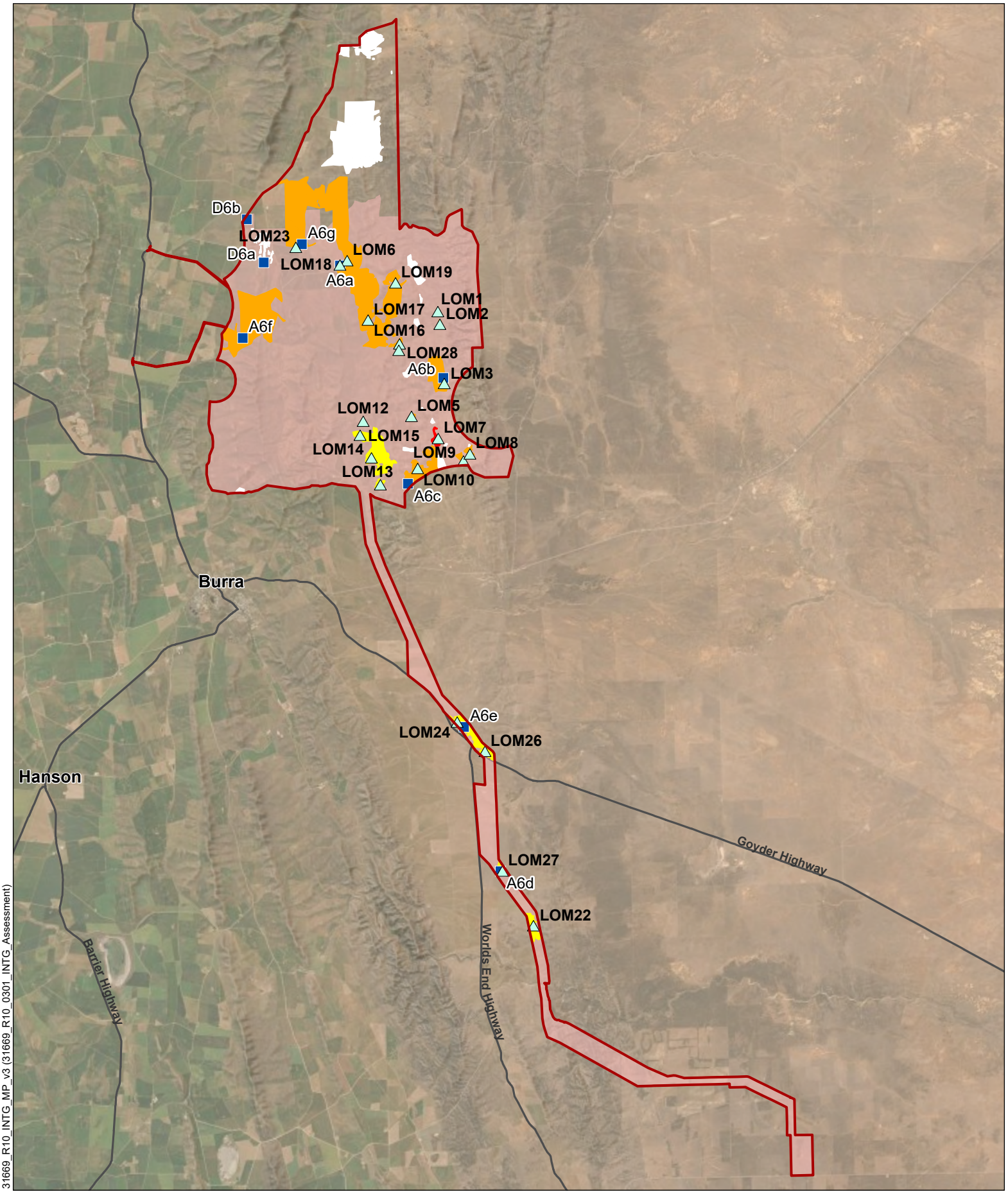
The precautionary principle was applied to two sites which came close to meeting the condition criteria for listing as INTG Class B. LOM10 met all criteria except the number of disturbance resistant broad-leaf herb species, containing only two of the three required to meet the criteria for INTG Class B.

An overview map of the INTG, the 23 targeted INTG sites, and Bushland Assessment Sites within the GNREF and GNWF is provided in **Figure 3.1**. For full details of the Targeted INTG survey refer to the INTG TEC Assessment Report (Umwelt 2025b).

Desktop mapping was used to separate INTG into a total of 51 'separate' patches defined by landholder boundaries. Where patches intersected with a targeted Lomandra assessment site or BAM site, the condition at that site was applied the patch, even if split by landholder boundaries. If no survey was undertaken in a patch, it was labelled as 'unsurveyed'. The 51 patches are described in **Appendix 1** and displayed (without labelling) on **Figure 3.2**.

Of these, 16 patches (totalling 1,480.07 ha) comprise INTG Class B, of which nine patches (accounting for 6.14 ha) are being impacted directly by clearance associated with the Disturbance Footprint, including 2.43 ha of permanent and 3.72 ha of temporary clearance. A further six patches comprise INTG Class C (totalling 307.63 ha of which 2.44 ha is being impacted in directly by the Disturbance Footprint (1.14 ha permanent, 1.30 ha temporary)), and one INTG Class A patch (totalling 18.02 ha, none of which is being impacted by the Disturbance Footprint).

Figure 3.1 INTG Assessment Sites and Condition Class Mapping



GNREF
GNWF
Lomandra survey site
Lomandra BAM site
INTG Condition
Class A
Class B
Class C
Unsurveyed

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 21/08/2025 10:58 AM
Created by: sophie.haswell

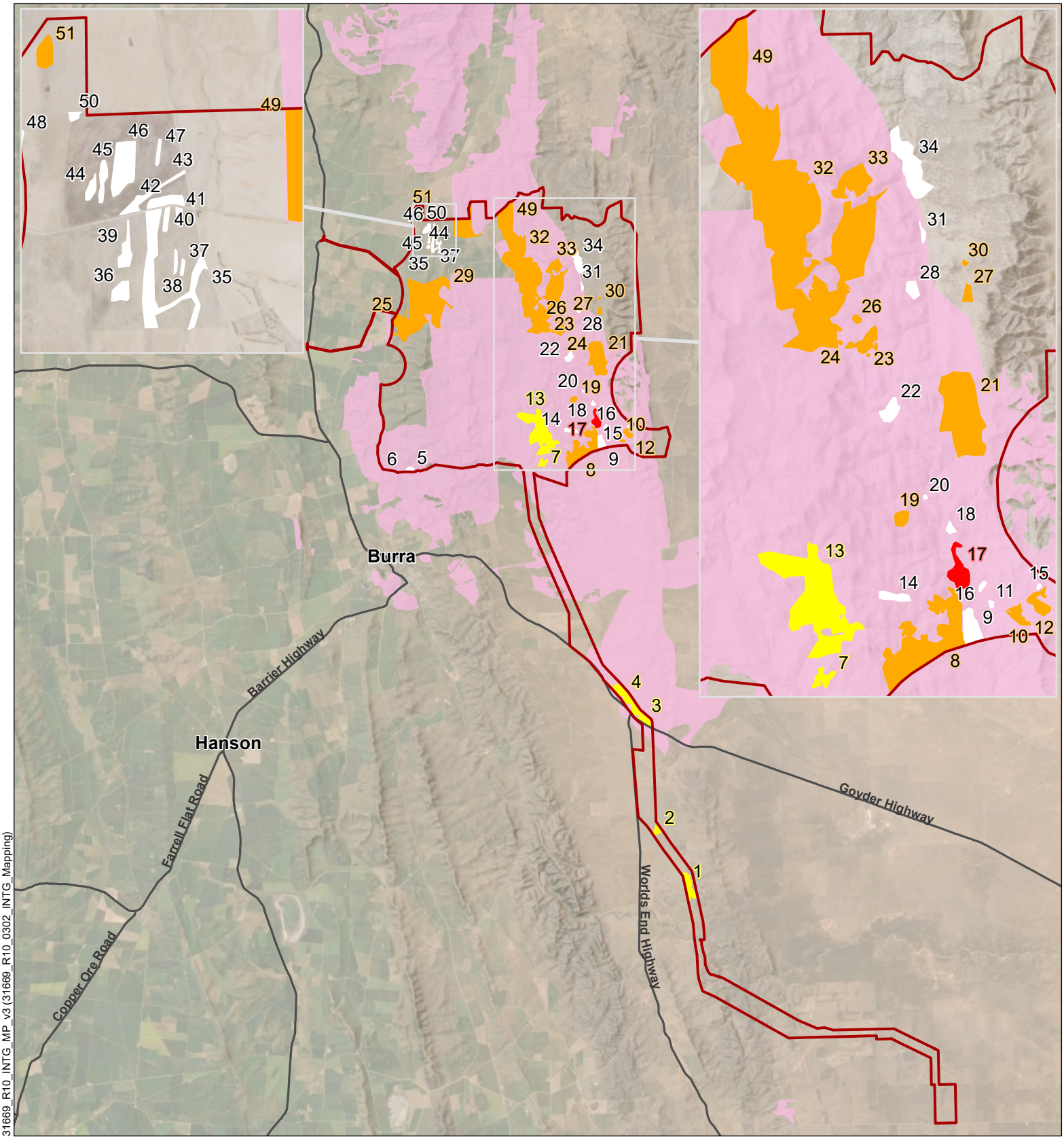
GDA2020 MGA Zone 54

0 2 4 km

N

31669_R10_INTG_MP_v3 (31669_R10_0301_INTG_Assessment)

Figure 3.2 Overview of INTG TEC Within GNWF. The map also shows the TEC likelihood mapping sourced from DCCEEW



GNWF

TEC Likely to Occur (DCCEEW)

Iron-grass Natural Temperate Grassland of South Australia

INTG Condition

Class A

Class B

Class C

Unsurveyed

31669_R10_INTG_MP_v3 (31669_R10_0302_INTG_Mapping)

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 21/08/2025 11:00 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 2.5 5 km

4.0 Impacts to INTG TEC

4.1 Project Disturbance Footprint

Based on the current Project design, the GNWF Project will directly impact (clear or remove) a total of up to 6.14 ha of the Critically Endangered TEC (INTG Class B), including 2.43 ha of permanent clearance and 3.72 ha of temporary clearance (**Table 4.1**). A further 2.44 ha of INTG Class C is proposed to be impacted by the Disturbance Footprint. INTG Class C does not meet the criteria for listing as a TEC but will be managed as such under this INTG Management Plan.

These values represent a worst-case assessment of impacts expected, and through ongoing design refinements, and mitigations, Neoen will seek to further reduce these impacts during all phases of the development. A Development Envelope (approx. 200 m buffer around Disturbance Footprint) is proposed to allow for micro-siting of the design and application of the Mitigation Hierarchy to avoid and minimise impacts to areas where INTG TEC occurs.

Although there is one patch of INTG Class A in the GNWF Project Area, this patch is not within the Disturbance Footprint or Development Envelope and is therefore not directly or indirectly impacted by the Project.

The areas of direct impact are displayed in **Figure 4.1** and **Figure 4.2**.

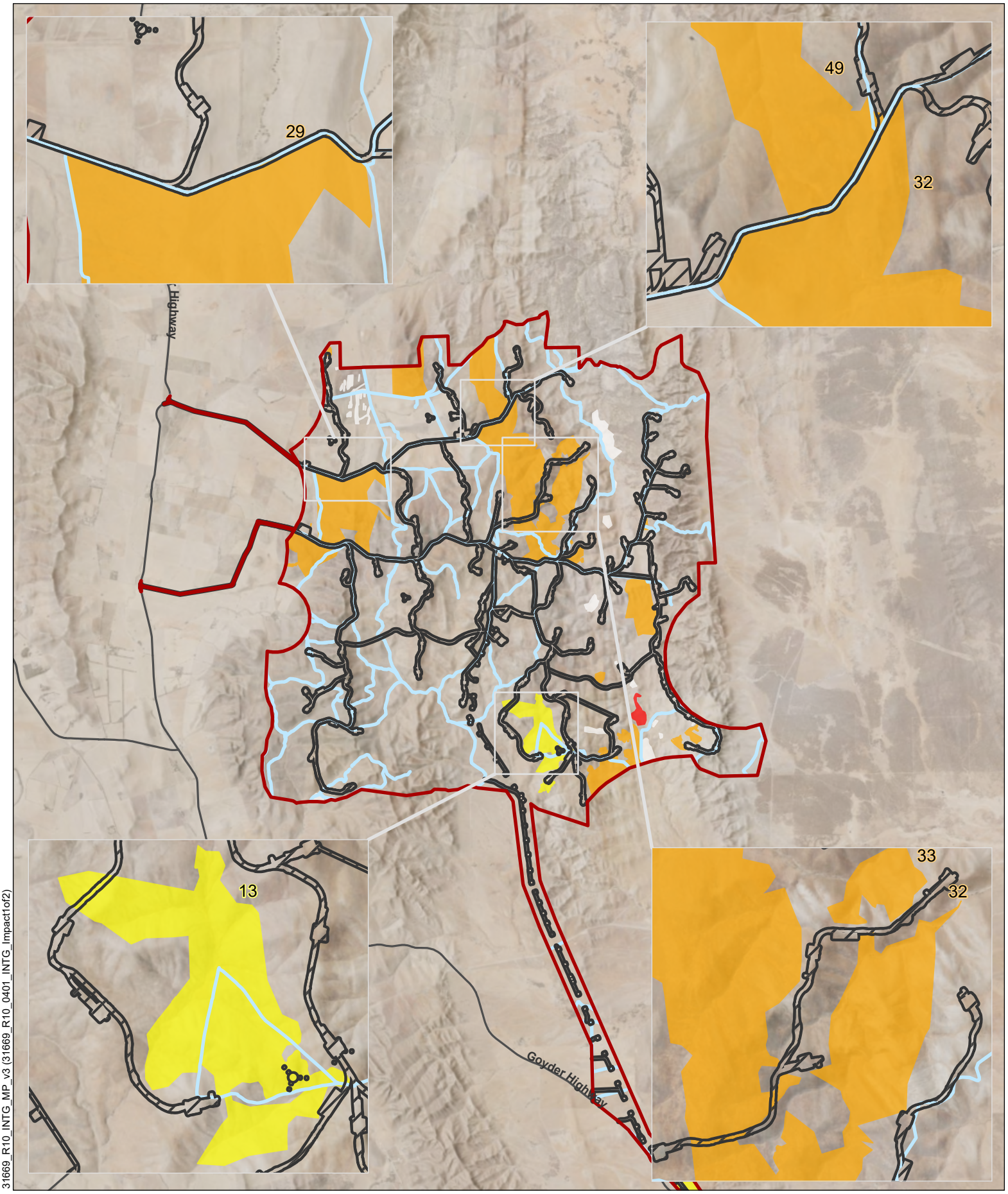
A summary of the likely direct impacts and potential indirect impact pathways to INTG TEC associated with the development (i.e. construction) and/or operation of the GNWF Project, are presented in **Table 4.2**.

Table 4.1 Summary of Impacts to INTG Within the GNWF Disturbance Footprint

Project Element	INTG Class	Permanent Impact (ha)	Temporary Impact (ha)	Total (ha)	Comments on Impacts
WF	A	0.00	0.00	0.00	No direct or indirect impact to occur, as the patch of INTG Class A is outside of the DF.
	B	2.43	3.72	6.15	Areas of INTG Class B that are temporarily cleared will be allowed to regenerate following clearance required for construction.
	C	0.68	0.39	1.07	INTG Class C does not meet the criteria for listing as a TEC but will be managed as such under this INTG Management Plan. Areas of INTG Class C that are temporarily cleared will be allowed to regenerate following clearance required for construction.
OTL	A	0.00	0.00	0.00	No direct or indirect impact expected to occur as no INTG Class A or INTG Class B is mapped within the OTL.
	B	0.00	0.00	0.00	
	C	0.46	0.91	1.37	INTG Class C does not meet the criteria for listing as a TEC but will be managed as such under this INTG Management Plan. Areas of INTG Calss B that are temporarily cleared will be allowed to regenerate following clearance required for construction.
TOTAL		**3.57**	**5.02**	**8.59**	

Note: Minor discrepancies in reported values are a result of rounding.

Figure 4.1 INTG Impacted by the Disturbance Footprint Across the Project Area (1 of 2)



GNWF
Disturbance Footprint
Existing road

INTG Condition
Class A
Class B
Class C
Unsurveyed

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 21/08/2025 11:08 AM
Created by: sophie.haswell

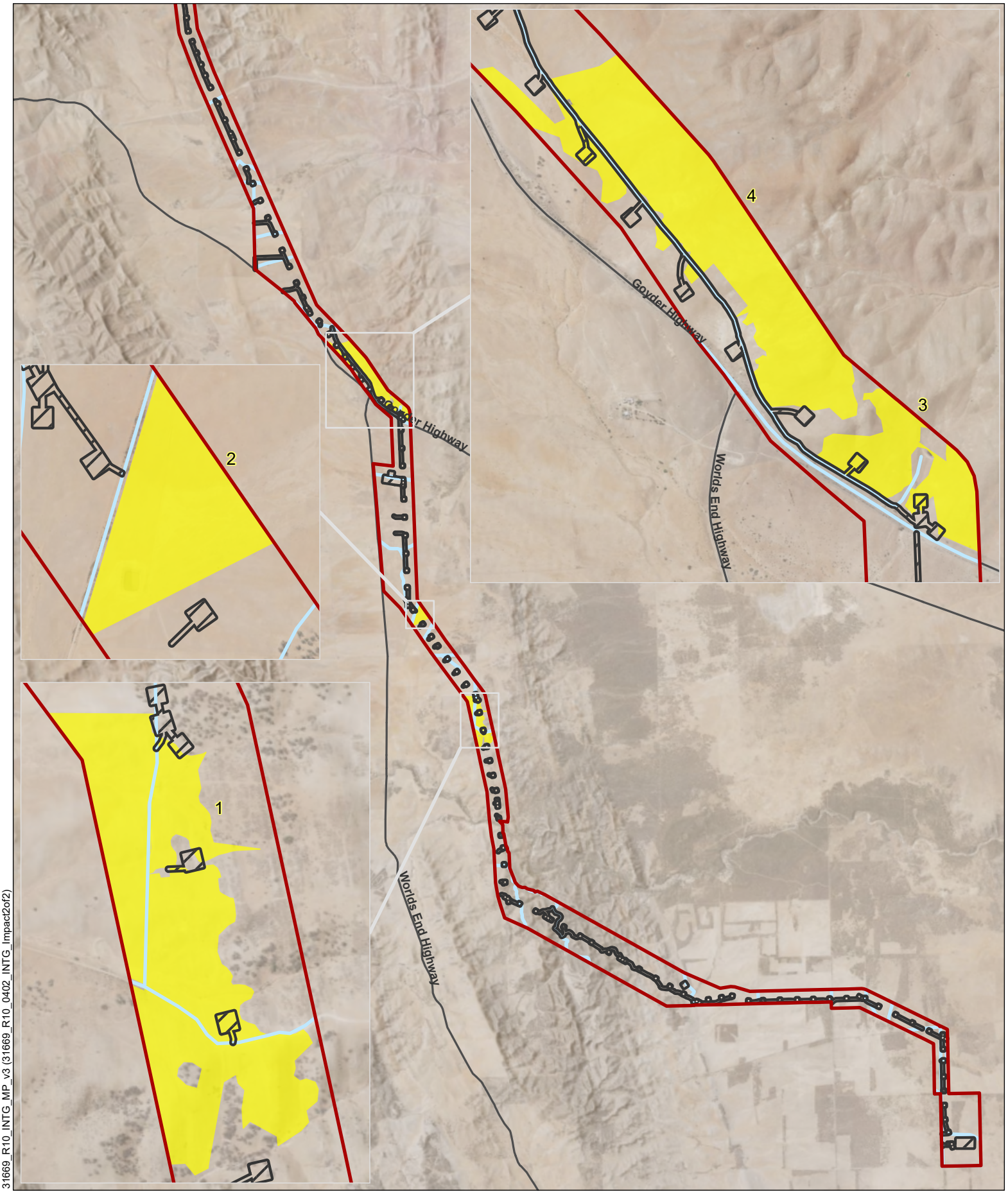
GDA2020 MGA Zone 54

0 2 4 km

N

31669_R10_INTG_MP_v3 (31669_R10_0401_INTG_Impact1of2)

Figure 4.2 INTG Impacted by the Disturbance Footprint Across the Project Area (2 of 2)



GNWF
Disturbance Footprint
Existing road

INTG Condition
Class C

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 21/08/2025 11:08 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

0 2 4 km

N

31669_R10_INTG_MP_v3 (31669_R10_0402_INTG_Impact2of2)

A summary of the likely direct impacts and potential indirect impact pathways to INTG TEC associated with construction and/or operation of the GNWF Project, are presented in **Table 4.2**.

Table 4.2 Likely Direct Impacts and Potential Indirect Impact Pathways to INTG TEC During Construction and Operation of the GNWF Project

During Construction	During Operation	Controls and Management Measures
Likely Direct Impacts		
Direct loss of up to 6.14 ha of INTG Class B and 2.44 of INTG Class C (**Section 3.4** and **Table 4.1**) (not currently representative of the TEC, but with potential for rehabilitation) through vegetation clearance for construction purposes.	None	**Design refinement**: Neoen are seeking to continue to minimise these direct impacts through design refinements throughout development and construction. **Micro-siting**: The location of infrastructure, including, but not limited to, vehicle access tracks, WTGs and underground electrical reticulation (installed via trenching), will be micro-sited within the Development Envelope away from INTG TEC, when practicable during pre-construction surveys to further avoid and/or minimise direct impacts (See **Section 9.1**).
Potential Indirect Impacts		
Clearance of INTG TEC outside the approved clearance area.	Clearance of INTG TEC outside the approved clearance area (i.e. via maintenance of existing infrastructure).	Avoidable through specific controls and management measures outlined in in this Plan (**Section 9.0**) as well as the CEMP and the / OEMP.
Loss of topsoil and subsequent erosion in areas adjacent to INTG patches, which may lead to impact within the TEC.	None	Avoidable through specific controls and management measures outlined in this Plan (**Section 9.0**), the CEMP, OEMP and sub-plans such as Erosion and Sediment Control Plan (or similar).
Sedimentation of INTG TEC from construction run-off (soil).	None	Avoidable through specific controls and management measures outlined in this Plan(**Section 9.0**), the CEMP, OEMP and sub-plans such as Erosion and Sediment Control Plan (or similar).
Altered hydrology (due to altering of drainage lines through excessive runoff).	None	Avoidable through specific controls and management measures outlined in this Plan(**Section 9.0**), the CEMP, OEMP and sub-plans such as Erosion and Sediment Control Plan (or similar).
Dust emissions smothering flora and suppressing photosynthesis.	None	Short term potential impact during construction only, which can be minimised through specific controls and management measures

During Construction	During Operation	Controls and Management Measures
		outlined in this Plan(**Section 9.0**), the CEMP, the OEMP and associated sub-plans.
Altered grazing regimes (increased grazing, preferential grazing, reduction or loss of grazing, altered grazing times).	Altered grazing regimes (increased grazing, preferential grazing (e.g. under turbine shade), reduction or loss of grazing, altered grazing times).	Difficult to predict likelihood and/or level of occurrence and likely consequences. During construction, any potential impact is expected to be short-term in nature and temporary. Furthermore, the Project Owner (Neoen) will not have any direct control over grazing regimes as it is controlled by land holders / land managers. However, any potential impacts identified by the landholder will be reported to the relevant personnel (i.e. community liaison officer) and corrective action undertaken if required.
Introduction of new weeds to the Project Area, or increase in weeds, through use of contaminated construction material, machinery and vehicles, leading to loss of vegetation condition.	Introduction of new weeds to the Project Area, or increase in weeds, through foot-traffic, light vehicles and other machinery that may be required during the operational phase (limited/minimal) leading to loss of vegetation condition.	Avoidable through specific controls and management measures outlined in this Plan (**Section 9.0**), the CEMP, OEMP and associated sub-plans such as Flora Management Plan and Weed Management Plan.
Stockpiling of equipment and materials and introduction of rubbish and waste materials causing degradation to the integrity of the grassland.	None	Avoidable through specific controls and management measures outlined in this Plan(**Section 9.0**), the CEMP and the OEMP.
Chemical spills (e.g. fuel/diesel) leading to loss or reduction of vegetation condition.	Chemical spills (e.g. fuel/diesel) leading to loss of vegetation condition.	Avoidable through specific controls and management measures outlined in this Plan(**Section 9.0**), the CEMP and the OEMP.
Vehicles and/or machinery driving on INTG TEC outside of approved clearance areas and tracks.	Vehicles and/or machinery driving on INTG TEC outside of approved clearance areas and tracks.	Avoidable through specific controls and management measures outlined in this Plan(**Section 9.0**), the CEMP and the OEMP.

4.2 Mitigation Measures to Avoid and / or Minimise Potential Direct and Indirect Impacts to INTG TEC

Project infrastructure has specifically been designed and/or located to avoid direct impact to INTG TEC as much as possible through application of the Mitigation Hierarchy. Ongoing application of these mitigation measures will seek to avoid direct impacts even further. The current assessment represents a worst-case scenario in terms of potential impacts.

In addition, the location of infrastructure, including, but not limited to, vehicle access tracks, WTGs and underground electrical reticulation (installed via trenching), will be micro-sited (i.e. moved and / or adjusted slightly) within the Development Envelope away from INTG TEC, wherever possible, prior to commencement of construction works to avoid and / or minimise direct impacts to INTG. Infrastructure will not be micro-sited if doing so does not result in a reduction of potential impacts to INTG TEC. Neoen also commits that micro-siting will not increase impacts to INTG and/or any other MNES, including, but not limited to Pygmy Blue-tongue Lizards (INTG) and INTG habitat, as detailed in a site specific INTG Management Plan (sub-plan) (Umwelt 2025).

Furthermore, while the Project has the potential to cause indirect impacts to INTG TEC, such as, but not limited to, erosion, sedimentation, dust and weeds, these indirect impacts will be avoided and/or minimised during construction and operation of the Project via implementation of specific controls contained within this INTG Management Plan (**Section 9.0** and **Section 10.0**). Lessons learnt on mitigating potential impacts on INTG TEC from the Goyder South Hybrid Renewable Energy Facility Project (detailed in **Section 6.4**), will be adopted and applied to the GNWF Project, if relevant.

Avoidance and mitigation measures implemented during detailed design, and those proposed as part of ongoing project refinements, as well as during construction and operational phases, are outlined in **Table 4.3**.

Table 4.3 Avoidance and Mitigation Measures Applied and Proposed

Avoidance / Mitigation Measure	Description	Effectiveness
Pre-construction / Design		
Site selection	Original site selection was based on: • the world-class wind resource • proximity to major transport routes and existing grid infrastructure • location on the edge of Goyder's Line in marginal agricultural cropping land which had historically been cleared and utilized for grazing • the rural location with low population density, reducing visual and noise impacts.	High –Neoen have sought to undertake development in areas of relatively low ecological significance (during the initial site selection process) and have applied the mitigation hierarchy to avoid and minimise impacts to native vegetation and MNES, but not all impacts are avoidable. As a result, offsets are required under both state (South Australian) and national legislation to ensure that any environmental impacts are adequately compensated. Neoen is committed to securing high ecological value offsets, that are on-ground wherever possible, for both native vegetation and any residual impacts to MNES, where these impacts are unavoidable.
Vegetation surveys	Multiple surveys have been conducted at various points in the Project design and development stage, including: • Early broad mapping of the site vegetation, condition and quality. • Detailed vegetation surveys using BAM to refine mapping and confirm condition, suitable for Native Vegetation Clearance Data Report under SA Legislation. • Targeted INTG TEC surveys within Disturbance Footprint and Development Envelope to refine mapping and measure against condition class criteria, to inform further micro-siting and management. • This approach ensured that all INTG was mapped and avoided as much as practicable in the first instance, with the precautionary principle applied to indicate that all Lomandra Grasslands could constitute the TEC.	High - determined areas of higher quality Lomandra Grassland and enabled early avoidance, with provision of ecological constraints mapping and risk analysis (EBS Ecology 2023a, EBS Ecology 2023b). This resulted in refinement to focus on developing the southern portion of the GNREF, effectively avoiding the large area of INTG concentrated in the northern portion of the GNREF, which accounts for over 37.85% of the INTG mapped in the GNREF, despite the northern portion of the GNREF accounting for only 17.55% of the overall Project Area. This also resulted in a reduction of impact to INTG (all condition classes) from 41 to 16 proposed WTGs in the preliminary design and careful placement of roads and cables to avoid fragmenting areas of INTG. From this revised and reduced turbine layout, a civil design of the likely road locations and hardstand extents was developed, by adopting 'exclusion areas' where possible for identified high quality (likely INTG) areas. This methodology effectively avoided impacts to the INTG TEC by ensuring the design avoided these areas as much as possible. Subsequent targeted INTG surveys in spring 2024, ensured that all areas of INTG proposed to be impacted have been surveyed in detail, resulting in accurate condition class assessment. This resulted in more refined avoidance once classification against the INTG TEC Condition Class Criteria had been undertaken.
Alignment with existing infrastructure	The Project Area has been sited to align wherever practicable with existing cleared areas including roads, infrastructure and cropped land. If roads or electrical cables are required to cross large patches of Lomandra Grassland to access WTGs, they have been placed in the narrowest (i.e. least impact) area. In some cases, alternative access track routes appear available, however, constraints associated with electrical cabling and distance from the substation and BESS, mean that alternative routes are not technically feasible unless access tracks and cables are constructed separately. As cables have been designed to align within temporary clearance areas of existing access tracks, to minimise clearance, the overall impact on native vegetation, as well as fragmentation, is reduced in these instances. Multiple design iterations showing avoidance and minimization to INTG as specified above are displayed in **Figure 4.1** and **Figure 4.2**.	High – Neoen has investigated design measures to minimize impacts in unavoidable locations. Neoen further demonstrated ongoing commitment to application of the mitigation hierarchy in August 2025, when a further improvement was implemented by rerouting an access track. Additional reductions were also made to INTG Class C at several other locations in the WF and OTL. Approximately 82.95 ha (46.24 ha permanent, 36.71 ha temporary) (or ~15.45%) of the total impact area occurs in non-native vegetation including: • 36.31 ha of existing roads or other clearance. • 28.85 ha of cropped land. • 17.73 ha of exotic pasture.
	Aligning electrical layout with temporary footprint associated with existing roads and proposed access tracks.	High- approximately 8.44 ha of INTG habitat avoided through this method. Note: not directly comparable due to the maturity of the design.
	Utilising existing access track infrastructure for GSWF OTL to reduce access track requirements for GNWF OTL.	Moderate - 0.72 ha of INTG (Class C) avoided using this method.
Non-conventional stringing methods	Removal of stringing corridor in areas of high value MNES habitat through application of non-conventional stringing methods (i.e. helicopter stringing).	High - Approximately 3.02 ha of INTG (Class C) avoided through this method.
Construction		
Construction Environmental Management Plan	A comprehensive document with multiple associated sub-plans which aim to avoid or minimise indirect impacts from construction such as through dust emissions, erosion, altered hydrology and general site matters. Includes measures for spatial data system to minimise the chance of unauthorised or incorrect clearance areas. Specific measures outlined below.	High - Indirect impacts effectively avoided.

Avoidance / Mitigation Measure	Description	Effectiveness
	INTG TEC outside of the approved clearance area (all condition classes) to be clearly defined as an ecologically sensitive area of detailed maps and spatial data applications supplied to construction contractors.	High – direct impacts minimized, indirect impacts effectively avoided.
	During construction, implement weed hygiene practices including vehicle checks and washdowns as required on vehicles or plant entering the construction site.	High – indirect impacts effectively avoided.
	During construction, undertake monthly weed surveillance monitoring targeting WoNS and Declared weed species, with follow up controls required for identified weed outbreaks. Weed control	High – indirect impacts effectively avoided.
INTG Management Plan	Specific document intended as a sub-plan of CEMP which details procedures to further avoid as well as minimize direct impacts and mitigate potential indirect impacts to INTG. Including but not limited to: • Reduced speed limits (25 km per hr within 50 m of INTG Class B, and max 40 km/hr elsewhere). • Clearly delineate avoidance areas and ecological no-go zones. • Unexpected finds procedure (i.e. stop work). • Detailed site-specific inductions for all staff and contractors related to INTG TEC, its legislative significance, potential impacts and management measures. • Detailed fact sheets at designated locations throughout operations and maintenance facilities and site offices. • Toolbox meetings with INTG highlighted. • Weed control in accordance with minimum disturbance techniques.	High - direct impacts minimised. Indirect impacts effectively avoided.
Pre-clearance Checks	Pre-clearance Checks in all areas of Project Area which contain INTG, with the aim to identify locations in which micro-siting may effectively reduce impacts.	Moderate - Allows for micro-siting to further minimise impacts and ensures any unexpected finds are reported and managed.
Micro-siting infrastructure	Pre-construction micro-siting surveys: Prior to commencing construction work (such as, but not limited to, clearing and grubbing and excavation) within INTG Class B and INTG Class C, the head construction contractor will work with specialist advisors (i.e. ecologists) to undertake a micro-siting process to micro-site (relocate) infrastructure to avoid and/or minimise impacts to INTG Class B and INTG Class C, where possible. No construction works will commence until approval has been provided in accordance with a dedicated the Permitting System.	No net increase in impact to INTG. Micro-siting will only be considered if it reduces impact on MNES.
Rehabilitation	The area of temporary clearance in INTG will be rehabilitated using best practice methods, as soon as practicable following disturbance (within two years). Areas of temporary disturbance are included in state and federal approvals to ensure that any offsets are above and beyond what is required to achieve a net environmental gain for the TEC.	High – 5.02 ha (58.44 %) of disturbed INTG will be rehabilitated following construction.
Operation		
Operational Environmental Management Plan	Management measures enforced to ensure no unforeseen direct or indirect impacts occur to INTG during the operational phase of the GNWF. Includes weed management, speed limits and rehabilitation monitoring.	High – Ensures direct impacts to INTG during operational works are avoided and indirect impacts are minimised through appropriate management measures.
EPBC Offset	EPBC Offset provides net gain for INTG in the region. Aim to rehabilitate and improve existing areas of INTG and implement formal protections to secure and improve in perpetuity.	High – Provides measurable conservation gain for INTG TEC.
Monitoring	Areas of temporary clearance will be monitored annually to assess trajectory of rehabilitation and to identify if any triggers for further action (adaptive management) are identified.	High – ensures that rehabilitation of 5.02 ha of temporary impact to INTG (all classes) is on positive trajectory to return to original condition (or better).
Decommissioning		
Reassessment and further surveys	To be developed at time of decommissioning. Likely to include targeted INTG surveys, Significant Impact Assessment (under relevant legislation and guidelines at the time of decommissioning) and approvals, if required.	High - Follows regulatory process relevant at the time of impact.

4.3 Estimated Residual Impact to INTG Within the Project Area

While Project infrastructure has specifically been designed and/or located to avoid impact to INTG TEC as much as possible, current assessment of Project design information, specifically the Disturbance Footprint, has determined that the Project will directly impact (clear or remove) up to 6.14 of INTG Class B (as summarised previously in **Section 4.1** and **Table 4.1**), based on the Disturbance Footprint, noting that this is a worst-case assessment of impacts and efforts to reduce this through further design refinements will continue to occur. This includes 2.43 ha of permanent disturbance and 3.72 ha of temporary disturbance, within which indirect impacts are expected to be contained, and thus accounted for.

4.3.1 Offset

Neoen is committed to establishing high-quality on-ground offsets for any impacts to native vegetation and Matters of National Environmental Significance (MNES) to fulfill requirements under both the NV Act and the EPBC Act. Neoen is also committed to rehabilitating all temporarily disturbed areas above and beyond the offset requirement which translates to rehabilitating 58.44% of the total footprint in addition to offsetting 100% of the footprint. Neoen is not seeking an offset obligation reduction that could have translated to a $1-2m saving, demonstrating commitment to generating a net positive outcome.

Neoen has secured a Significant Environmental Benefit (SEB) offset site to compensate for approximately half of the NV Act offset obligations, for impacts to native vegetation. The SEB offset site is located to the northeast of the GNWF Project Area and comprises approximately 1,300 ha of formerly agricultural grazing land with a mixed covering of vegetation associations similar to those mapped within the GNWF Project Area. This includes up to 44.94 ha of Lomandra (Iron-grass) grassland, which may constitute the INTG TEC. This, and the remainder of the SEB site will be managed to improve vegetation condition, as required under the NV Act, to offset approximately half of the proposed native vegetation disturbance and will compensate for impacts to Lomandra grassland (all condition classes) as required under the NV Act. An NV SEB Offset Management Plan has been developed for this area.

Neoen is also developing an additional EPBC Offset Proposal and Management Plan to offset residual impacts to INTG under the EPBC Act. Investigations are currently ongoing to secure an additional suitable site that will be utilized as an EPBC Offset Area. It is proposed to use an existing patch (or patches) of INTG Class C within the GNWF Project Area (listed in **Appendix 1**), which will be protected, maintained, and improved to achieve a measurable conservation gain and potential improvement in condition to INTG Class B. An INTG EPBC Offset Management Plan will be developed for the final selected EPBC Offset site(s).

Refer to the Goyder North Wind Farm EPBC Offset Strategy (Umwelt, 2025c) for more detail.

5.0 Implementation of this INTG Management Plan

This INTG Management Plan is proposed to be implemented as a sub-plan of the CEMP (Umwelt 2025 – *in draft*). It is anticipated that the CEMP will be implemented during the construction phase of the GNWF Project to reduce any associated adverse environmental impacts and satisfy regulatory requirements.

Refer to the CEMP for more detailed information on the following aspects:

- Work stages (schedule of works).
- Environmental Management System.
- Project commitments and regulatory requirements.
- Roles and responsibilities.
- Implementation:
    - Induction.
    - Meeting and communication.
    - Monitoring, inspections and auditing.
    - Reporting.
    - Review.
    - Permit system (also outlined below).
    - Incident reporting and non-compliance.
    - Complaints procedure.
    - Management of sub-contractors.
    - Records distribution and control.
- Management and mitigation measures.
- Management sub-plans.

This INTG Management Plan will be implemented as a sub-plan of the CEMP and in conjunction with all other relevant sub-plans.

Once the construction phase has been completed, this INTG Management Plan is proposed be implemented as a sub-plan of the OEMP.

The implementation schedule is provided throughout this INTG Management Plan, but the following specific implementation schedule details are listed below:

- Targets, Performance Indicators, Triggers Management Measures and Corrective Actions (**Table 7.1**).
- General Construction Management Measures (**Table 9.2**). including construction management measures, location, timing / frequency, monitoring activity, responsibility, management trigger and corrective action.

- General Operational Management Measures (**Table 10.1**), including operational management measures, type, location, timing/frequency, monitoring activity, responsibility, management trigger and corrective action.

5.1 Permit System

The CEMP includes implementation of a Permit System as follows (Umwelt 2025 - in draft).

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 Manager. Following the same process, an inspection can bring about a stop work when signed off by the Project, Construction or Environment Manager.

This Permit System will be used in conjunction with the pre-construction micro-siting procedure presented in **Section 9.1**, to ensure that work in an undisturbed area (such as, but not limited to, clearing and grubbing, and excavation) will not commence until initial site inspection and subsequent micro-siting of infrastructure to avoid and/or minimise impacts to INTG TEC, has been completed and approval provided for works to commence.

5.1.1 Construction

Clearance approval: Approval to clear native vegetation to be granted in accordance with Regulation 12, Schedule 1; Clause 34 of the Native Vegetation Regulations 2017 and Section 25A of NV Act ((ref. 2025/3089/422).

There are specific conditions associated with the various Approvals which should also be understood (refer to the approvals for details).

- EPBC Approval Conditions relevant to INTG TEC are listed in **Section 2.0** and in **Table 2.2**.
- NV Act Approval Conditions relevant to the INTG TEC are listed in **Section 2.0** and in **Table 2.3**.

5.1.2 Operation

Clearance approval: Maintenance of the existing permanent Disturbance Footprint can be continued in accordance with Regulation 8(2) – Maintenance of infrastructure. Refer to the *Native Vegetation Regulations 2017* for specific requirements.

Further clearance such as additional infrastructure, additional tracks or other new clearance will require assessment under a new clearance pathway under the *Native Vegetation Regulations 2017* and NV Act and may require clearance notification and/or additional approval.

5.2 Roles and Responsibilities

As stated previously, this INTG Management Plan is proposed to be implemented as a sub-plan of the CEMP which will be implemented during the construction phase of the GNWF Project. As outlined in the CEMP, both Neoen and the Construction Contractor (within the Engineering, Procurement and Construction (EPC) Contractor) have a role in implementing the requirements of the CEMP, and

associated sub-plans, such as this INTG Management Plan. Refer to the CEMP for more detail on the roles and responsibilities of Neoen and the Construction Contractor and sub-contractors.

Once the construction phase has been completed, this INTG Management Plan is proposed to be implemented as a sub-plan of the OEMP, which will be implemented by The Project Owner (Neoen) and the Project's Operation and Maintenance Contractors.

It is anticipated that there will be three main roles associated with implementation of this Plan, the Construction Project Manager / Asset Manager (Neoen); the EPC Contractor and an Ecological Consultant (Contractor). The specific personnel fulfilling these roles may change over time, particularly across the lifetime of the Project. The aspects and/or tasks that each role is likely to be responsible for are outlined in **Table 5.1**.

Project employees, contractors and sub-contractors will also have a role, as will the Department, which is also outlined in **Table 5.1**.

Table 5.1 Overview of Roles and Responsibilities Associated with Implementation of this Plan

Role	Aspects and / or Tasks the Role is Responsible for
Construction Project Manager / Asset Manager (Neoen)*	• 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. Neoen intends to own and operate the GNWF Project in the future. • The Construction Project Manager / Asset Manager (Neoen)* will be responsible for implementing this Plan. • It is anticipated that the Construction Project Manager / Asset Manager (Neoen)* will engage a suitably qualified Ecological Consultancy to assist with rehabilitation of temporary clearance areas, monitoring and reporting. However, implementation of this Plan will remain the responsibility of the Construction Project Manager / Asset Manager (Neoen)*. • The Construction Project Manager / Asset Manager (Neoen)* must ensure that they do not commence operation** of the Project unless the Plan has been approved by the Minister in writing. • Should the Construction Project Manager / Asset Manager (Neoen)* change in future, implementation of this Plan will remain the responsibility of whoever is the Construction Project Manager / Asset Manager (Neoen)*.
EPC Contractor	• The EPC Contractor is constructing GNWF Project and is responsible for implementing the CEMP, and sub-plans such as this INTG Management Plan. As such, the EPC Contractor will also be responsible for implementing this Plan during construction, including the management measures associated with construction works. Key roles under the EPC Contractor are described in the CEMP (**Section 9.0**). Briefly, roles include Project Director, Project Manager, Project Engineer, Construction Manager, Environmental Manager, Health Safety and Environmental (HSE) Officer and Construction Contractor. Roles may vary depending on the EPC Contractor selected.
Ecological Consultant (Contractor)	• It is proposed that a suitably qualified and experienced Ecological Consultant (Contractor) will be responsible for assisting the Construction Project Manager / Asset Manager (Neoen)* to implement 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

Role	Aspects and / or Tasks the Role is Responsible for
	success (or failure) of management actions and recommending refinement/improvement, if required.
Project Employees, Contractors and Sub-contractors	• All Project employees, contractors and sub-contractors are responsible for ensuring work is undertaken in accordance with this plan, including reporting any incidents, such as unexpected finds of INTG or unauthorised clearance or damage to INTG outside of the approved Disturbance Footprint, to the Construction Contractor, Health Safety Environment (HSE) Manager and/or Construction Project Manager / Asset Manager (Neoen)*, who shall report it as an environmental incident and undertake an environmental incident investigation (in accordance with
The Department and the Minister	• Review and approve this Plan (if appropriate). • Review and approve a revised version of this Plan (if required).

*The Construction Project Manager (Neoen) will change to Asset Manager (Neoen) once Practical Completion is achieved under the Engineering, Procurement and Construction Contract.

**Refer to the Glossary and Abbreviation of Terms for a definition of 'operation'.

5.3 Risks to Implementation

There are several potential risks to achieving this Plan's environmental objectives, detailed in the CEMP (Umwelt 2025 - in draft). Risks specifically relevant to This Plan, include:

- 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 over the life of the Project (Construction and Operation) (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 detailed in Section 7 of the CEMP (Umwelt 2025 - in draft), 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.

5.4 Review and Revision

This INTG Management Plan is proposed to be undertaken periodically for actions undertaken over long timeframes (five yearly intervals), or when the following occurs:

- following significant environmental incidents
- when there is a need to improve performance in an area of environmental impact
- if circumstances change/approvals are varied
- when alternate management measures or methods, such as new technologies need to be incorporated.

The review (and revision) of this INTG Management Plan is the responsibility of the Project Owner/Approval holder (Neoen) who will engage a suitably qualitied Ecologist / Ecological Consultant to undertake this task.

Reviews will use the management data collected to date, together with land manager, ecological consultant, expert advice and Project Owner (Neoen) input. The results or findings of the review will determine the overall success of existing management actions and identify any corrective actions that may be required and the results of any audits, to ensure the objectives of the INTG Management Plan are met. During the review process, any reasons for varying the environmental management plan will be documented.

Each review will be documented within an amended version of the INTG Management Plan and include:

- the review process
- the status of measurable outcomes associated with each management action
- the management/monitoring results to date
- any amendments to the management actions/corrective actions, if required
- any amendments to the monitoring requirements, and
- any recommendations for future reviews.

The amended version of the INTG Management Plan will be provided to the land manager and submitted to the Department for reference. Any significant changes to the INTG Management Plan may require approval from the Department.

5.5 Submission and Publication

Section 143A of the EPBC Act allows the approval holder to submit a revised action management plan (RAMP), such as this INTG Management Plan, to the Minister for approval at any time. In anticipation of the approval conditions being implemented, a revised action management plan will be submitted to the Minister for approval unless the conditions state otherwise. Specifically, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact, the approval holder may choose to revise the action management plan without submitting it for approval under section 143A of the EPBC Act.

As such, any revisions of this Plan will be submitted to the Department either for information or for approval by the Minister, in accordance with the anticipated conditions of approval. Furthermore, any revisions of this Plan will be published on the Project's website as required by the anticipated conditions of approval. It will remain on the Project's website until the end date of the relevant EPBC Act approvals.

If Neoen decides to revise this Plan without submitting it for approval by the Minister, Neoen will:

- Notify the Department in writing that the approved action management plan has been revised and provide the Department with:
  a. an electronic copy of the RAMP (i.e., this Plan);
  b. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;

c. an explanation of the differences between the approved action management plan and the RAMP;

d. the reasons Neoen considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and

e. written notice of the date on which Neoen will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department.

Neoen will implement the RAMP from the RAMP implementation date.

6.0 Risk Assessment of Potential Impacts

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 6.1**) and consequence (**Table 6.2**).

Table 6.1 Likelihood of Risk Occurring

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 6.2 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

The likelihood of risk and the consequence are then combined to generate a risk rating (**Table 6.3**), associated with likely management actions (**Table 6.4**). The likelihood and consequence ratings have been assessed prior to consideration of any control measures.

Table 6.3 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
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 6.4 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.

Table 6.5 and **Table 6.6** detail the risk assessment for potential impacts during construction and operation, respectively. Implementation of specific construction and operational management measures (outlined in **Section 9.0 and Section 10.0**) for each identified risk to INTG TEC, 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.

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.

6.1 Risk Assessment of Potential Impacts During Construction

Table 6.5 Risk Assessment of Potential Impacts During Construction

Activity	Potential Impact (Event or Circumstance)	Risk Rating			Management / Mitigation Measures (Further Detailed in Sections 4.2 and 9.0)	Residual Risk Rating (After Controls Implemented)	Performance Targets Monitoring Activities, Management Trigger and Corrective Actions
		Likelihood	Consequence	Inherent Risk Rating			
Unapproved Clearance	Clearance of INTG TEC outside the approved clearance area.	Possible	Major	High	Provide clear maps and spatial data indicating Disturbance Footprints, tracks, approved turnaround areas, car parks, equipment laydown areas and materials storage areas to ensure that no unapproved disturbances occur which may affect INTG.	Medium	Detailed in **Sections 6.3**, **8.0** and **9.0**.
	Vehicles and/or machinery driving on INTG TEC outside of approved clearance areas and tracks.	Likely	Moderate	Medium	Apart from initial earthworks to construct access tracks and hardstand areas, ensure all vehicles and construction equipment always utilise existing farm tracks and dedicated access tracks and hardstands and avoid travel outside of these areas.	Low	Detailed in **Sections 6.3**, **8.0** and **9.0**.
Weeds, Pests and Grazing	Introduction of new weeds to the Project Area, or increase in weeds, through use of contaminated construction material, machinery and vehicles, leading to reduction in vegetation condition in adjacent areas.	Likely	Moderate	Medium	Infrastructure, such as hardstands and access tracks, should not be used to install new watering points or feed-lots if these did not previously occur in the same or similar location.	Low	Detailed in **Sections 6.3**, **8.0** and **9.0**.
	Altered grazing regimes (increased grazing, preferential grazing, reduction or loss of grazing, altered grazing times), leading to changes in INTG TEC structure, composition and condition.	Possible	Minor	Low	A CEMP has been developed for the project (Umwelt 2025k – in draft), with Project specific management plans such as a Soil Erosion and Sedimentation Control Plan, to be adopted by the Engineering Procurement and Construction (EPC) Contractor prior to, and during, construction. Ensure all vehicles, earthmoving equipment and construction equipment are clean and free of soil material, including materials containing weed seed or propagules, prior to arriving onsite.	Low	Detailed in **Sections 6.3**, **8.0** and **9.0**.
Soil Erosion, Sedimentation and Altered Hydrology	Loss of topsoil and subsequent erosion leading to degradation of INTG in adjacent areas outside of approved clearance area.	Possible	Moderate	Medium	A CEMP has been developed for the project (Umwelt 2025k – in draft), with Project specific management plans such as a Soil Erosion and Sedimentation Control Plan, to be adopted by the Engineering Procurement and Construction (EPC) Contractor prior to, and during, construction. Ensure all erosion and sediment controls are checked for effective operation and maintained, repaired or improved in INTG habitat.	Low	Detailed in **Sections 6.3**, **8.0** and **9.0**.
	Sedimentation of INTG TEC from construction run-off (soil).	Likely	Minor	Low	A CEMP has been developed for the project (Umwelt 2025k – in draft), with Project specific management plans such as a Soil Erosion and Sedimentation Control Plan, to be adopted by the Engineering Procurement and Construction (EPC) Contractor prior to, and during, construction. Ensure all erosion and sediment controls are checked for effective operation and maintained, repaired or improved, particularly in areas mapped as the INTG TEC.	Low	Detailed in **Sections 6.3**, **8.0** and **9.0**.
	Altered hydrology (due to altering of drainage lines through excessive runoff), leading to unfavourable changes in INTG structure and composition.	Possible	Moderate	Medium	A CEMP has been developed for the project (Umwelt 2025 – in draft), with Project specific management plans such as a Soil Erosion and Sedimentation Control Plan, to be adopted by the Engineering Procurement and Construction (EPC) Contractor prior to, and during, construction. Ensure all hydrology controls are checked for effective operation and maintained, repaired or improved, particularly in areas mapped as the INTG TEC.	Low	Detailed in **Sections 6.3**, **8.0** and **9.0**.

Activity	Potential Impact (Event or Circumstance)	Risk Rating			Management / Mitigation Measures (Further Detailed in Sections 4.2 and 9.0)	Residual Risk Rating (After Controls Implemented)	Performance Targets Monitoring Activities, Management Trigger and Corrective Actions
		Likelihood	Consequence	Inherent Risk Rating			
	Dust emissions smothering INTG TEC flora and suppressing photosynthesis, leading to reduction of vegetation condition in adjacent areas.	Likely	Moderate	Medium	The draft CEMP for the Project addresses broad management measures to be implemented during the construction phase of the Project, inclusive of a Dust (Air Quality) Management Plan. Dust is considered a short-term potential impact during construction, and therefore unlikely to cause long-term effects on INTG if dust management measures are implemented. These measures are detailed in the CEMP, OEMP and relevant environmental sub-plans. Rehabilitate exposed and disturbed soils as soon as possible. Prioritise rehabilitation to temporary construction areas impacting INTG. Adaptive management measures (such as reducing vehicle speed and increasing road watering) will be implemented during periods of elevated dust, as a general environmental management measure.	Low	Detailed in **Sections 8.0** and **9.0**.
	Stockpiling of equipment and materials and introduction of rubbish and waste materials causing degradation to the integrity of the grassland, including through harbouring pest animal species such as rabbits.	Likely	Moderate	Medium	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). Separation distances to be maximized as much as possible from INTG TEC habitat, with additional measures imposed for stockpiles within 200 m of INTG, including: prompt redistribution of topsoil following construction, appropriate dust suppression through watering, covering or application of soil binders.	Low	Detailed in **Sections 8.0** and **9.0**.
Hazardous Materials and Spillages	Chemical spills (e.g. fuel/diesel) leading to a reduction in vegetation condition.	Possible	Minor	Low	Hazardous materials and dangerous goods containers and storage areas, including refuelling areas will be stored and managed in accordance with applicable Australian Standards, Safety Data Sheets and site-specific Safe Work Method Statements.	Low	Detailed in **Sections 8.0** and **9.0**.
	Inappropriate use of herbicides or pesticides for weed management leading to reduction in vegetation condition of INTG.	Possible	Minor	Low	The use of herbicides or pesticides for weed management will be undertaken as per EPA Guidelines for Responsible Pesticide Use (EPA, 2005 (updated 2017)), and as per Weed and Pest Management Measures, which are detailed in the CEMP and OEMP.	Low	Detailed in **Sections 8.0** and **9.0**.
Rehabilitation Management	Areas of temporary clearance in INTG fail to regenerate with native INTG associated species.	Likely	Minor	Medium	Investigate and report all non-compliance. Review and revise this INTG Management Plan, the INTG Monitoring program and the Rehabilitation Management Plan.	Low	Detailed in **Sections 8.0** and **9.0**.

6.2 Risk Assessment of Potential Impacts During Operation

Table 6.6 Risk Assessment of Potential Impacts During Operation

Activity	Potential Impact (Event or Circumstance)	Risk Rating			Management / Mitigation Measures (Further Detailed in Sections 4.2 and 9.0)	Residual risk rating (after controls implemented)	Monitoring Activity, Management Triggers and Corrective Actions
		Likelihood	Consequence	Inherent Risk Rating			
Unapproved Clearance	Clearance of INTG TEC outside the approved clearance area (including for future installation of infrastructure or maintenance of existing infrastructure).	Possible	Moderate	Medium	Provide clear maps and spatial data indicating Disturbance Footprints, tracks, approved turnaround areas, car parks, equipment laydown areas and materials storage areas to ensure that no unapproved disturbances occur which may affect INTG.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
	Vehicles and/or machinery driving on INTG TEC outside of approved clearance areas and tracks.	Possible	Moderate	Medium	Ensure all vehicles and construction equipment utilise existing formed and approved access tracks and hardstands and avoid travel outside of these areas.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
Weeds, Pests and Grazing	Altered grazing regimes (increased grazing, preferential grazing (e.g. under turbine shade), reduction or loss of grazing, altered grazing times) leading to changes in INTG TEC structure, composition and condition.	Possible	Minor	Low	Infrastructure, such as hardstands and access tracks, should not be used to install new watering points or feed-lots if these did not previously occur in the same or similar location.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
	Introduction of new weeds to the Project Area, or increase in weeds, through foot-traffic, light vehicles and other machinery that may be required during the operational phase.	Possible	Moderate	Medium	Ensure all vehicles, earthmoving equipment and construction equipment are clean and free of soil material, including materials containing weed seed or propagules, prior to arriving onsite. If vegetative material or earth is present, ensure that the equipment is washed down at an appropriate facility to prevent vegetative material or earth potentially containing weed seeds being brought into the site.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
Soil Erosion, Sedimentation and Altered Hydrology	Loss of topsoil and subsequent erosion leading to degradation of INTG in adjacent areas outside of approved clearance area.	Possible	Minor	Low	Ensure all erosion and sediment controls are checked for effective operation and maintained, repaired or improved.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
	Sedimentation of INTG TEC from run-off (soil) in cleared areas.	Possible	Minor	Low	Ensure all erosion and sediment controls are checked for effective operation and maintained, repaired or improved.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
	Altered hydrology, due to altering of drainage lines through excessive runoff or concentrating water in new locations (i.e. roadside), leading to unfavourable changes in INTG structure and composition.	Possible	Minor	Low	Ensure that all erosion and sediment control measures installed in accordance with the requirements outlined in Section 8.8 of the CEMP, and as detailed in the Erosion and Sedimentation Control Plan and Stormwater Management Plan. Ensure that regular monitoring is undertaken (as detailed in the above plans) to ensure no contamination of site soils, surface water courses or groundwater in the vicinity of the Project Area and INTG.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
	Dust emissions smothering INTG TEC flora and suppressing photosynthesis, leading to reduction of vegetation condition in adjacent areas.	Possible	Minor	Low	An Air Quality Management Plan / dust suppression procedure will be developed by Contractor, as a subplan of the CEMP/OEMP. Dust is considered a short-term potential impact during construction only, and therefore unlikely to cause long-term effects on INTG if dust management measures are implemented. The Air Quality Management Plan will outline monitoring protocols to ensure dust levels remain within acceptable limits and comply with regulatory standards during operation of GNWF. Ensure that all dust control measures are undertaken, in accordance with best practice principles for dust management.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
Hazardous Materials and Spillages	Chemical spills (e.g. fuel/diesel) leading to a reduction in vegetation condition.	Rare	Minor	Low	Hazardous materials and dangerous goods containers and storage areas, including refuelling areas will be stored and managed in accordance with applicable Australian Standards, Safety Data Sheets and site-specific Safe Work Method Statements.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.

Activity	Potential Impact (Event or Circumstance)	Risk Rating			Management / Mitigation Measures (Further Detailed in Sections 4.2 and 9.0)	Residual risk rating (after controls implemented)	Monitoring Activity, Management Triggers and Corrective Actions
		Likelihood	Consequence	Inherent Risk Rating			
	Inappropriate use of herbicides or pesticides for weed management leading to reduction in vegetation condition of INTG.	Possible	Minor	Low	The use of herbicides or pesticides for weed management will be undertaken as per EPA Guidelines for Responsible Pesticide Use (EPA, 2005 (updated 2017)), and as per Weed and Pest Management Measures, which are detailed in the CEMP and OEMP.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.
Rehabilitation Management	Areas of temporary clearance in INTG fail to regenerate with native INTG associated species.	Likely	Minor	Medium	Investigate and report all non-compliance. Review and revise this INTG Management Plan, the INTG Monitoring program and the Rehabilitation Management Plan.	Low	Detailed in **Sections 7.0**, **8.0** and **9.0**.

6.3 Limitations Associated with the Risk Assessments

The potential impact of changed grazing patterns or altered natural watering regimes due to new roads on INTG are not well understood. The monitoring program (on site) (**Section 11.0**) will assess the condition of INTG at rehabilitation, impact and control sites. This monitoring will determine if there are impacts occurring (e.g. from grazing or dust / erosion), which will trigger a review of what is causing impact.

In the absence of further information now, only an indicative risk rating can be provided. As new data becomes available, management actions for the TEC will be reassessed, and the INTG Management Plan will be updated accordingly.

6.4 Review of Goyder South Learnings

Neoen is nearing completion of the construction phase of GS, for which a similar INTG Management Plan was implemented. As they move forward with the GNWF Project, Neoen is committed to using best practices by incorporating learnings from the various phases of the GSWF Project. By systematically capturing and applying insights gained from previous projects, organizations can enhance processes, prevent recurring mistakes, and refine best practices. This approach not only improves efficiency and effectiveness but also drives better outcomes in future initiatives. Neoen aims to leverage these benefits to ensure the successful implementation of the GNWF Project.

Table 6.7 details the learnings from the planning, pre-construction and construction phases of GSWF, and the adapted approach that GNWF has, or intends to adopt.

Table 6.7 Learnings from Phases of Development of GSWF

Phase	GSWF Lesson	GNWF Adapted Approach
Pre-construction	Pre-clearance surveys were thorough and time-consuming.	Implement CEMP conditions to improve construction scheduling, allowing longer lead times for pre-clearance and relocation site searches, and micro-siting.
	Pre-clearance surveys identified more INTG TEC than anticipated, necessitating more intensive relocation efforts than expected.	Conduct intensive surveys to more accurately reflect the anticipated impact on INTG TEC, to avoid and minimize impacts as much as possible and allow for micro-siting.
Construction	Civil design was not fully developed, leading to design changes and updates during construction.	Ensure civil design is more developed and optimized for GNWF.
	In addition to micro-siting for INTG TEC, late changes to civil design made it difficult to keep track of changes, resulting in instances where the entire construction team was not working from the same design, leading to some unauthorized clearances.	The CEMP outlines the requirement for the construction contractor to have detailed spatial data and a specific system to communicate design changes and record all modifications. All changes go through a single database and are distributed to all team members, including machinery operators, to ensure everyone is on the same page.

7.0 Management Targets, Performance Indicators and Triggers

A range of management targets associated with corresponding performance indicators and triggers for management actions are detailed in **Table 7.1**.

Table 7.1 Management Targets, Performance Indicators and Triggers

Targets	Performance Indicators	Triggers	Management Measures and Corrective Actions
Unapproved Clearance			
Construction and operation do not result in clearance of more than 6.14 ha of INTG Class B, 2.44 ha of INTG Class C, and no impact to INTG Class A.	Final disturbance area of INTG TEC, as measured through post construction field audit/survey and / or aerial imagery.	Clearance of INTG Class B outside of the approved Disturbance Footprint.	Detailed in **Sections 8.0** and **9.0**.
Onsite assessment of micro-siting feasibility undertaken by construction contractor prior to clearance for areas where the Disturbance Footprint intersects with INTG Class B and INTG Class C.	All infrastructure is micro-sited to further reduce impact to INTG Class B if possible. Measurable reduction in the area of INTG being impacted between current design and construction, based on post-clearance auditing of clearance area.	Any impact to retained INTG TEC outside of the approved clearance area and/or the Disturbance Footprint.	Detailed in **Sections 8.0** and **9.0**.
Construction and operation do not result in clearance of INTG TEC habitat in excess of the limits stated in the EPBC Act approvals (refer to **Table 2.2**) and EPBC Act approval documentation).	No clearance of INTG TEC habitat in excess of the limits stated in the EPBC Act approvals (refer to **Table 2.2**) and EPBC Act approval documentation).	Any impact to INTG TEC outside of the approved clearance area and/or the Disturbance Footprint.	Detailed in **Sections 8.0** and **9.0**.
No vehicle, machinery or equipment impacts within retained INTG TEC.	No vehicle, machinery or equipment impacts observed within retained INTG TEC.	Vehicle, machinery or equipment impacts observed within retained INTG TEC.	Detailed in **Sections 8.0** and **9.0**.
Weeds, Pest and Grazing			
No introduction of new weed species or increase in weed abundance or distribution within retained INTG TEC.	No records of new weed species or increased distribution or abundance of existing weeds observed within retained INTG TEC.	New weed species or an increase in weed distribution or abundance observed within retained INTG TEC.	Detailed in **Sections 8.0** and **9.0**.

Targets	Performance Indicators	Triggers	Management Measures and Corrective Actions
Construction and operation do not result in a significant alteration to grazing regime.	No significant alteration to the grazing regime due to construction or operation. No communications from landholders to indicate a change in grazing regime has occurred as a result of the infrastructure.	Significant alteration to grazing regime within Disturbance Footprint (e.g. increased grazing, preferential grazing) as communicated by the landowner(s) / manager(s).	Detailed in **Sections 8.0** and **9.0**.
Soil Erosion, Sedimentation and Altered Hydrology			
No erosion or sedimentation within retained INTG TEC.	No evidence of erosion or sedimentation observed during routine environmental audits within retained INTG TEC.	Any signs of notable erosion or sediment accumulation as a result of uncontrolled surface water flows within retained INTG TEC.	Detailed in **Sections 8.0** and **9.0**.
No excessive dust deposition within retained INTG TEC.	No excessive dust deposition observed within retained INTG TEC during routine environmental audits during construction. A Dust (Air Quality) Management Plan outlines monitoring protocols to ensure dust levels remain within acceptable limits and comply with regulatory standards.	Excessive dust deposition observed within retained INTG TEC, during . Dust monitoring results exceed limits and do not comply with regulatory standards.	Detailed in **Sections 8.0** and **9.0**.
Hazardous Materials and Spillage			
No rubbish, waste materials or stockpiles within retained INTG TEC.	No rubbish, waste materials or stockpiles observed within retained INTG TEC.	Rubbish, waste materials or stockpiles observed within retained INTG TEC.	Detailed in **Sections 8.0** and **9.0**.
No hazardous chemicals or dangerous goods within retained INTG TEC.	No hazardous chemicals or dangerous goods observed within retained INTG TEC.	Hazardous chemicals or dangerous goods observed within retained INTG TEC.	Detailed in **Sections 8.0** and **9.0**.
No broadscale herbicide use in INTG TEC (i.e. targeted treatments only and using specific herbicides).	No impact to non-target vegetation (i.e. native vegetation) from use of herbicide.	Impact / dieback of native vegetation after application of herbicide.	Detailed in **Sections 8.0** and **9.0**.
Rehabilitation Management			

Targets	Performance Indicators	Triggers	Management Measures and Corrective Actions
Regeneration of INTG TEC within designated 'temporary' clearance areas (3.72 ha INTG Class B, and 1.30 INTG Class C).	Regeneration of native species, reminiscent of surrounding unimpacted INTG, with trajectory of improvement observed within temporary Disturbance Footprint.	No regeneration of native species recorded in temporary Disturbance Footprint within three years of rehabilitation commencing.	Detailed in **Sections 8.0** and **9.0**.

8.0 Response Measures and Corrective Action

If a trigger value occurs (**Table 7.1**), it will be reported as an environmental incident. An investigation will then be conducted to determine the extent and cause of the incident, and to prevent it from occurring again. For example, the proposed management measure for that management target, performance indicator and trigger will be reviewed to ensure it is being effectively implemented, operated and / or maintained. If it is not, it will be repaired and / or improved.

8.1 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 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.
- If there is any change to the clearance requirements for the development, Neoen is to confirm the final clearance area and SEB offset 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 DCCEEW can be notified.
    - If the approval holder (Neoen) needs to clear outside of the approved Project Area, then they must speak to the Department prior to doing so.
    - If clearance occurs outside of the approved Project Area, then this is a non-compliance issue, and the approval holder (Neoen) must self-report to the Department.
- 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.

8.2 Indirect Impact

If an indirect impact trigger occurs (e.g. erosion and/or sedimentation, excessive dust, new weed species or increase in weeds, and others outlined in **Table 7.1**), 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 will 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 INTG Management Plan, the CEMP, OEMP 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.

9.0 Construction Management Measures

The types of construction management measures are divided into five categories, based on the Standard Hierarchy of Controls, described in **Table 9.1**. 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 will be updated to reflect the specific EPC Contractor positions and responsibilities.

Management measures relevant to INTG to be implemented during construction are outlined in **Table 9.2**. Please refer to the CEMP (Umwelt, 2025) for further details on broad management measures for GNWF.

Table 9.1 Description of the Types of Construction Management Measures

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	Protect the worker (or environmental aspect) with Personal Protective Equipment.

Table 9.2 General Construction Management Measures

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
Pre-construction Micro-siting Surveys							
When works are proposed to commence in high-risk areas containing INTG TEC, ensure adequate lead in time is available to: • undertake pre-construction surveys and micro-siting • clearly identify and indicate environmental no-go zones around INTG Class B and INTG Class C to be avoided, using spatial data as a minimum. Flagging and survey pegs may be used as a method for clear delineation to mark the extent of the approved Disturbance Footprint where practicable.	Administrative	Site Office	Pre-construction Four weeks prior to commencing any works within or adjacent to INTG TEC. As required	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	Site Supervisor / HSE Manager	Pre-clearance survey not undertaken within the 1-4 week timeframe or ground clearance does not occur within 4 weeks of the pre-clearance checks.	Stop work immediately and do not undertake any ground-disturbing activities until pre-clearance checks have been completed. If the 4-week validity period for ground disturbance following a pre-clearance check has expired, a new pre-clearance check must be conducted before works commence. If ground disturbance occurs without a pre-clearance check, this constitutes a non-compliance incident. A stop-work procedure must be implemented, the incident investigated, and reported to DCCEEW.
Pre-construction Micro-siting Surveys: Prior to commencing construction work (such as, but not limited to, clearing and grubbing, and excavation) within INTG Class B and INTG Class C, the head construction contractor will work with specialist advisors (i.e. ecologists) to undertake a micro-siting process to micro-site (relocate) infrastructure to avoid and/or minimise impacts to INTG Class B and INTG Class C, where possible. A micro-siting process is detailed in **Section 9.1**. No construction works will commence until approval has been provided in accordance with the Permit System outlined in **Section 2.0** and the CEMP.	Administrative	Within INTG Class B and INTG Class C within the Disturbance Footprint	Pre-construction. As required and ongoing during design	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	Site Supervisor / Health Safety and Environment (HSE) Manager	Pre-clearance survey not undertaken within the 1-4 week timeframe or ground clearance does not occur within 4 weeks of the pre-clearance checks.	Stop work immediately and do not undertake any ground-disturbing activities until pre-clearance checks have been completed.
Unexpected Find Procedure: If pre-clearance surveys within the Disturbance Footprint detect areas of INTG which have not previously been mapped, a 'Stop Work' procedure must be in place.	Administrative	Disturbance Footprint	Pre-construction / construction As required	N/A	Site Supervisor / HSE Manager	Detection of areas of INTG, not previously mapped are detected.	If clearance occurs outside of the approved area, then this is a non-compliance issue, and the approval holder must report to

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
							the department. If the approval holder needs to clear outside of the approved project area, then they must speak to the department prior to doing so.
General Management Measures							
Inductions: All staff and contractors will complete a detailed, site-specific induction which provides an overview of INTG TEC, its legislative significance and potential impacts to INTG TEC as well as management measures associated with protection of INTG TEC.	Administrative	Site office (or anywhere else suitable)	Prior to commencing any work on site. Once	Daily checks must be undertaken to ensure that all new staff and contractors have completed site inductions prior to commencing any works on site.	Site Supervisor / HSE Manager	Staff or contractor working onsite without having completed the required inductions.	Any staff member or contractor who has not completed the required site inductions must immediately stop work and cannot recommence until the induction has been fully completed.
Fact Sheets: Display a fact sheet on INTG TEC (include images of INTG TEC and mapping showing the location of INTG Class B and INTG Class C within the Project Area) at all Site Offices.	Administrative	On site notice boards and in lunchrooms	During construction. Ongoing	Weekly checks of noticeboards.	Site Supervisor / HSE Manager	No factsheets or information available about INTG on main noticeboards and/ or common areas.	Provide factsheets and information about INTG for all noticeboards and common areas.
Toolbox and Pre-start Meetings: Hold toolbox and pre-start meetings assist in identification and highlight the importance of INTG TEC. During the meetings, highlight INTG TEC included in the Disturbance Footprint; as well as INTG TEC outside of the Disturbance Footprint, including Class B and Class C and ensure that all staff and contractors are aware of the control measures to avoid, minimise and mitigate impacts to INTG TEC.	Administrative	Site Office (or anywhere else suitable)	Prior to commencing any works within or adjacent to INTG TEC. As required	Conduct toolbox meetings prior to commencing any construction works within INTG TEC areas, or within 200 me of INTG habitat.	Site Supervisor / HSE Manager	INTG information is not included in toolbox meetings and/ or no reminders are provided in pre-start meetings.	Hold a pre-start meeting to provide information on INTG management requirements and species identification. Ensure reminders to include INTG management requirements in all subsequent toolbox meetings.
Clearance Delineation and INTG Protection Measures							
Mapping and Spatial Data: Provide clear maps and spatial data indicating Disturbance Footprints, approved tracks, turnaround areas, car parks, equipment laydown areas and materials storage areas, as well as exclusion zones to ensure that no unapproved disturbances occur which may affect INTG TEC.	Engineering	Provide to those involved in earthworks	Prior to commencing any work on site. Ongoing	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented.	Site Supervisor / HSE Manager	No clear maps or spatial data provided.	Provide clear maps and spatial data and ensure all staff and contractors working onsite have access to these resources. Stop work immediately and report the non-compliance. Investigate the cause of the non-compliance and implement measures to ensure all staff/contractors have access to

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
							accurate maps and spatial data before resuming work.
Signage and Exclusion Zones: Clearly identify and indicate exclusion zones around areas of INTG Class B which adjoin the Disturbance Footprint using spatial data as a minimum (noting that ALL native vegetation is protected and must be avoided outside of the approved clearance areas). Spatial data will be used for clear delineation as a minimum, as well as signage and barriers/bunting where practicable.	Engineering	Around the outside of all INTG TEC	Prior to commencing any works in, or within 200 m of INTG TEC. Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any exclusion zones requiring improved delineation or maintenance of barriers/signage, as well as to detect any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained	Site Supervisor / HSE Manager	Insufficient signage and/or barriers around exclusion zones. Vehicle movements or clearance occurring within exclusion zones.	Stop work immediately until the delineation of the exclusion zones is improved using spatial data, bunting/barriers, and signage. Report non-compliance. Investigate the cause of the non-compliance and implement corrective measures.
Clearly Delineate Boundary of Disturbance Footprint: Prior to commencing large scale clearing, the outer extents of the approved disturbance footprint will be clearly identified and indicated through spatial mapping. Often this will occur through sending the grader through first using GPS control with preloaded spatial data, to make a mark at outer extents, or in some instances signage or bunting may be used.	Engineering	On the edge of the Disturbance Footprint within INTG TEC.	As soon as possible during construction works. Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any disturbance footprint boundaries requiring improved delineation or maintenance of barriers/signage, as well as to detect any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained	Site Supervisor	Insufficient signage and/or barriers. Vehicle movements or clearance occurring outside of the Disturbance Footprint.	Stop work immediately until the delineation of the Disturbance Footprint is improved using spatial data, bunting/barriers, and signage. Report non-compliance. Investigate the cause of the non-compliance and implement corrective measures.
Approved Clearances: Clearly delineate on site INTG TEC that is included in the approved Disturbance Footprint. As a minimum, this is to be done using spatial data management system and process 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).	Engineering	Disturbance Footprint	Prior to clearing any INTG TEC. Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any INTG habitat within the Disturbance Footprint requiring improved delineation or maintenance of barriers/signage, as well	Site Supervisor / HSE Manager	Insufficient signage and/or barriers. No Permit to Work obtained. Pre-clearance checks and associated micro-siting or relocations have not occurred.	Stop work immediately until the delineation of INTG habitat within the Disturbance Footprint is improved using spatial data, bunting/barriers, and signage.

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
If clearance occurs outside of the approved area, then this is a non-compliance issue, and the approval holder must report to DCCEEW. If the approval holder needs to clear outside of the approved project area, then they must consult with DCCEEW prior to doing so.				as to detect any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.			Stop all work immediately until a valid Permit to Work is issued. Stop work immediately and do not undertake any ground-disturbing activities until pre-clearance checks have been completed. If the 4-week validity period for ground disturbance following a pre-clearance check has expired, a new pre-clearance check must be conducted before works commence. If ground disturbance occurs without a pre-clearance check, this constitutes a non-compliance incident. A stop-work procedure must be implemented, the incident investigated, and reported to DCCEEW.
Weeds, Pest and Grazing Management							
Pre-construction Weed Surveys: Undertake a baseline weed survey within the Development Envelope to understand existing weed conditions and potential impacts (e.g. spread) during construction which may impact INTG TEC. Focus on mapping of Declared weeds. A Weed Management Plan will be developed for the construction phase of the wind farm. This plan will integrate data from baseline weed surveys conducted prior to construction and adhere to all requirements listed within this INTG Management Plan when undertaking weed monitoring and control in INTG TEC areas.	Administrative	Development Envelope and Development Footprint	Prior to commencing any construction works. Ongoing	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	Neoen	No baseline weed surveys undertaken.	Conduct baseline weed surveys as soon as practicable, prioritising spring surveys.
Ongoing Weed Monitoring and Control: Undertake periodic weed monitoring and control, to mitigate potential impacts (e.g. spread) during construction (and operation) which may impact INTG areas. Ensure all monitoring activities are recorded, including extent, date and findings. The Weed Management Plan will include, at a minimum:	Administrative	Within INTG TEC and throughout Disturbance Footprint	Regular weed monitoring at a minimum of twice per year, once in early winter and again in early spring to capture problem weeds as they emerge before setting seed.	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being	Site Supervisor / HSE Manager	Missed weed monitoring commitment.	Undertake weed monitoring as soon as practicable after identifying missed commitment.

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
• Opportunistic monitoring for new declared weed outbreaks or expansion of existing outbreaks; • Quarterly photo-point monitoring for declared weeds in high-risk areas (e.g., stockpiles, main access tracks, wash-down bays); and • Quarterly monitoring for weed outbreaks within INTG TEC habitat inside the Disturbance Footprint.			Ongoing	implemented and maintained. Annual compliance reports must be submitted detailing management measures implemented.			
<u>Weed Control:</u> Ensure that any weed control uses a method which is in accordance with minimum disturbance techniques and does not have a significant adverse impact on INTG TEC. This will include hand pulling of weeds and/ or spot spraying of individual weeds with targeted recommended herbicide and use of spray hood to prevent off target application. Any accidental spray onto native plants will be rectified by promptly removing sprayed leaves / branches if practicable.	Engineering	Within INTG TEC and throughout Disturbance Footprint	Weed control will occur in winter and spring, or as required to control outbreaks. Weed control will occur whenever the following triggers are identified within INTG TEC: • New outbreaks (locations) of declared weeds recorded. • Increase in extent of declared weed outbreaks (compared to baseline surveys). • Establishment of weeds within disturbed areas. During construction. Ongoing	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained. Annual compliance reports must be submitted detailing management measures implemented.	Site Supervisor / HSE Manager	Weed control methods are not undertaken using a method which is in accordance with minimum disturbance techniques and does not have a significant adverse impact on INTG TEC. New weed outbreaks or an increase in the extent of existing outbreaks in INTG.	Stop all weed control measures which do not comply. Investigate and report all non-compliance. Implement additional weed control measures to contain outbreaks and increase monitoring efforts to detect any further spread.
<u>Weed Management</u>: If soil or fill material stockpiles become infested with weeds, ensure weed control is undertaken in accordance with minimum disturbance techniques and weed control work does not have a significant adverse impact on INTG TEC. Prioritise stockpile monitoring and weed management specific to INTG soil, and use hand-pulling techniques where possible, to minimise potential damage to soil seedbank, required for rehabilitation activities.	Engineering	Soil stockpiles	Ongoing during construction	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	Site Supervisor / HSE Manager	Weed control methods are not undertaken using a method which is in accordance with minimum disturbance techniques and does not have a significant adverse impact on INTG TEC. New weed outbreaks or an increase in the extent of existing outbreaks in INTG.	Implement additional weed control measures to contain outbreaks and increase monitoring efforts to detect any further spread.
<u>Vehicle and Equipment Hygiene:</u> No vehicles will be required to work off existing formed roads during the operation of the wind farm (noting, there may be some instances where machinery may need to go off road for some works e.g. if a cable fault occurs, machinery will need to attend the area to excavate the cable and repair it. Temporary disturbance will be minimised wherever possible, and contractors would avoid INTG restored areas wherever possible). Ensure all vehicles and maintenance equipment are clean and free of soil material, including materials containing weed seed or	Engineering	Site entrance and INTG TEC boundary	Prior to arriving on site and prior to commencing works within, or near, INTG TEC. As required	Weekly vehicle and equipment inspections will be conducted by the Environmental Compliance Manager/Officer to identify any detect any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis	Site Supervisor / All site personnel	Vegetative material or earth is identified on vehicles, earthmoving equipment and/or construction equipment.	Ensure vehicles and equipment are washed down at an appropriate facility prior to commencing work onsite to prevent vegetative material or earth potentially containing weed seeds being spread across the

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
propagules, prior to arriving on site, and prior working near INTG grasslands. If vegetative material or earth is present, ensure that the equipment is washed down at an appropriate offset facility to prevent vegetative material or earth potentially containing weed seeds being brough into the site and into areas of INTG TEC.				(at least monthly) to ensure all management commitments are being implemented and maintained.			site and into areas of INTG. Investigate and report any non-compliance and implement corrective actions including additional weed monitoring and control methods if required.
Wash-down Bays: Ensure that designated wash-down bays to clean vehicles and construction equipment during construction works are appropriately contained with a capture dam to withhold dirt and organic matter, with only water filtered through a sediment fence or similar, eventually being released to the environment. Water release points will be designed in a way to avoid water runoff impacts to INTG habitat. Frequent targeted weed monitoring (and control) will occur in the capture dams and at water release points to prevent weed establishment.	Engineering	Site Compound.	Prior to commencing and during construction works. Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any detect any non-compliance.	Site Supervisor	Weed outbreaks are identified at wash-down bays. Wash-down bays are not appropriately contained within a capture dam and/or water release points lead to runoff into INTG.	Implement weed control measures to manage outbreaks as soon as practicable. Do not use wash-down bays with declared weed outbreaks until control measures have been implemented and outbreaks are contained. Maintain wash-down bays to ensure appropriate capture dams and direct water away from INTG. If this is not feasible, relocate the wash-down bay to a less ecologically sensitive area.
Soil Stockpiles: Where possible, ensure dedicated soil stockpile storage areas, such as in laydown areas, are located at a minimum distance of 200 m from any area mapped as INTG TEC **Appendix 2**. If this minimum separation distance between dedicated stockpile areas, is not able to be achieved, separation distances to be maximized as much as possible and additional measures imposed including: • prompt redistribution of topsoil following construction, • appropriate dust suppression through watering, covering or application of soil binders. Where stockpiles in dedicated stockpile zones are required to remain for over seven days, regular monitoring to ensure dust suppression is effective will need to occur, including monitoring for weeds. If soil or fill material stockpiles become infested with weeds, ensure weed control is undertaken in accordance with minimum disturbance techniques (as above) and weed control work does not have a significant adverse impact on INTG TEC.	Engineering	Disturbance Footprint	As soon as practicable and at least 10 – 14 days prior to moving material. As required	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any detect any non-compliance.	Site Supervisor / HSE Manager	Weed outbreaks are identified in stockpiles. Topsoil removed from temporary clearance areas within mapped INTG is not clearly marked.	Implement weed control measures to manage outbreaks as soon as practicable. Do not move stockpiles until control measures have been implemented and outbreaks have been contained. Do not move stockpiles until origin of soil is determined by reviewing the procedures outlines in the CEMP .

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
Prioritise stockpile monitoring and weed management specific to INTG soil, and use hand-pulling techniques where possible, to minimise potential damage to soil seedbank, required for rehabilitation activities. Exclusion zones to be available in digital format to all contractors during construction. Topsoil removed from temporary clearance areas within mapped INTG will be stockpiled separately to other soil stockpiles and clearly marked so that it can be redistributed in the corresponding INTG location at commencement of construction.							
Livestock Grazing Regimes: If a significant alteration of grazing regime (for example increased grazing or preferential grazing in particular areas) is observed and considered to be potentially impacting INTG, then it will need to be investigated by a suitably qualified ecologist and mitigation measures, or additional monitoring implemented where and if possible. Landholder to advise Neoen if any substantial changes to the usual grazing regime and / or placement of watering points is required because of the construction of GNWF. Proposed alternative locations will be reviewed by a suitably qualified ecologist to ensure no adverse impacts to INTG could be reasonably expected due to the proposed change. To ensure GNWF prevents, or minimises its impact on existing livestock grazing regimes, project infrastructure, such as hard stands and access tracks, shall not be used to install new watering points for placement of livestock feeders.	Administrative	Project Area	Prior to, and during construction (and operation). Ongoing, as required	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	HSE Manager /Neoen Liaison / Ecological Contractor	Changes to usual grazing regime and / or placement of watering points and/or fed lots is required because of the operations of GNWF.	If a water point or feedlot is relocated into ecologically sensitive areas, or if existing water points or feedlots within such areas (e.g., INTG habitat) are preferentially used by the landholder due to wind farm infrastructure, increased monitoring effort will be required to assess the impact of altered livestock management on these habitats.
Soil Erosion, Dust Management and Drainage Management							
Rehabilitation: In areas of disturbed INTG (any class) or in areas within 200 m of an INTG patch, re-establishing cleared topsoil will be prioritised, with redistribution and scarification throughout exposed areas to have occurred within two years after ground disturbance to enable natural regeneration to commence. Rehabilitation management, including monitoring are detailed in **Section 9.2** and **Section 11.0.**	Engineering	Disturbance Footprint. Within 200 m of INTG TEC patch	As soon as practicable. Ongoing	Rehabilitate areas of disturbed INTG (any class) or in areas within 200 m of an INTG patch as per methods specified in the Rehabilitation Management Plan, within two years after ground disturbance.	EPC Contractor, Neoen and Ecological Consultant	Rehabilitation not undertaken within two years after ground disturbance.	Investigate and report any non-compliance and implement corrective actions including a review of rehabilitation management procedures. Investigate and report on any impacts to INTG habitat which may result from rehabilitation not being undertaken.
Erosion and Sediment Controls: Ensure all erosion and sediment controls are checked for effective operation and maintained, repaired or improved, particularly in areas mapped as INTG TEC.	Administrative	Disturbance Footprint.	Regularly (weekly as a minimum), particularly prior to any significant rainfall event or in response to an observed trigger.	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any non-compliance.	Asset Manager (Neoen) HSE Manager	Soil erosion and sedimentation is identified in INTG areas.	Repair, maintain or improve erosion and sediment controls as required and in line with control measures outlines in the Soil Erosion and

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
				The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.			Drainage Management Plan. Investigate and report on any impacts to INTG habitat which may result from soil erosion or sedimentation.
Dust Deposition: Monitor for visual signs of dust deposition on INTG TEC within 50 m of Disturbance Footprint.	Administrative	INTG within 50 m of Disturbance Footprint	Regular (weekly inspections). Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	HSE Manager	Visual signs of dust deposition on INTG TEC within 50 m	Implement adaptive management measures such as reducing vehicle speeds and increasing road watering. Investigate and report on any impacts to INTG habitat which may result from dust deposition.
Soil Stockpiling: Where possible, ensure dedicated soil stockpile storage areas, such as in laydown areas, are located a minimum distance of 200 m from any area mapped as INTG TEC (see **Appendix 2** for INTG Management Zones). If this minimum separation distance between dedicated stockpile areas cannot be achieved, separation distances to be maximized as much as possible and additional measures imposed include: • prompt redistribution of topsoil following construction, • appropriate dust suppression through watering, covering or application of soil binders. Where stockpiles in dedicated stockpile zones are required to remain for over seven days, regular monitoring to ensure dust suppression is effective will need to occur, including monitoring for weeds. For incidental stockpiles used during earthworks and cut and fill balancing across the site that occur within 200 m of INTG TEC, will be subject to increased frequency of dust suppression measures through water application, during earthworks Exclusion zones to be available in digital format to all contractors during construction.	Engineering	Disturbance Footprint	Construction Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any detect any non-compliance.	Site Supervisor, HSE Manager	No prompt redistribution of topsoil following construction. No appropriate dust suppression through watering, covering or application of soil binders.	EPC contractor to coordinate any required soil stockpile management actions at / on construction sites.
Traffic Speed Limits: A maximum speed limit of 40 km/hr enforced on all access tracks. For access roads within 200 m of INTG TEC, additional dust suppression measures will be imposed through either application of material binders along roads in these sections, or speed limits of 25 km/hr enforced using signposts, with monitoring for compliance.	Administrative	Project Area	During construction. Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any non-compliance.	Site Supervisor	Traffic speed limits are not adhered to.	Reinforce the importance of adhering to site speed limits during pre-start and toolbox meetings.

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
				The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.			Address non-compliance immediately by reminding staff and contractors who fail to observe speed limits.
Minimise Disturbance of Soil and Vegetation: Minimise disturbance of soil and vegetation during all activities undertaken throughout the construction phase (including vehicle access, general infrastructure, and site maintenance, weed control, fire management, grazing and fauna surveys) within the Project Area, particularly within areas mapped as INTG TEC, by: • Only driving on designated vehicle access tracks. • Ensuring that all designated vehicle access tracks and site stormwater drainage is well maintained to prevent erosion and sedimentation from occurring. • Minimising digging and soil disturbance to only that which is required to implement the approved action, including ripping of rabbit warrens to control rabbits.	Engineering	Disturbance Footprint.	During construction During all activities.	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	Site Manager	Unnecessary disturbance of soil or vegetation occurs outside designated areas or approved activities within INTG TEC.	Stop work and investigate the reasons for unnecessary disturbance. Reinforce site access controls by clearly marking designated tracks and turnaround points. Conduct toolbox talks or pre-start briefings to remind staff and contractors of soil and vegetation disturbance protocols. Review and update erosion and sediment controls if disturbance has increased erosion risk. Stop work immediately and report the incident if disturbance occurs outside the approved Disturbance Footprint. Incident reporting for unnecessary disturbance must include the location, extent, and corrective measures taken, for compliance documentation and reporting.
Hazardous Materials and Dangerous Goods Management							
Hazardous materials and dangerous goods containers and storage areas, including refuelling areas will be stored and managed in accordance with applicable Australian Standards, Safety Data Sheets and site-specific Safe Work Method Statements.	Engineering	Disturbance Footprint and Development Envelope	Ongoing	Weekly/daily site inspections will be conducted by the Environmental Compliance	Site Supervisor / HSE Manager	Storage and management of hazardous materials/dangerous goods not compliant with Australian	Rectify storage immediately, update procedures, and reinforce compliance through toolbox talks. Document actions

Construction Management Measures	Type	Location	Timing/Frequency	Activity	Responsibility	Management Trigger	Corrective Action
				Manager/Officer to identify any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.		Standards, SDS, or SWMS. Hazardous material or dangerous goods spill in INTG TEC or within 200 m of INTG.	before resuming work. Contain and clean up spill using approved methods, notify relevant personnel, remediate habitat, and document incident for compliance reporting.
Best practice and low impact use of herbicides (as outlined in Weed, Pest and Grazing Management sections).	Engineering	Disturbance Footprint, Development Envelope	Ongoing, As required	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained. Annual compliance reports must be submitted detailing management measures implemented.	HSE Manager	Weed control methods are not undertaken using a method which is in accordance with minimum disturbance techniques and does not have a significant adverse impact on INTG TEC.	Stop all weed control measures which do not comply. Investigate and report all non-compliance.
Rehabilitation Management (see Section 11.0)							
<u>INTG Monitoring:</u> Conduct regular onsite monitoring of INTG vegetation communities to detect any unforeseen impacts resulting from construction or related activities. Additional targeted surveys and mitigation measures will be required if monitoring identifies signs of damage, decline, or other adverse effects on INTG TEC areas. Undertake ongoing monitoring in INTG Class B areas undergoing rehabilitation following temporary construction impacts to measure successful recovery and identify any need for adaptive management. Document all monitoring results and adjust management strategies accordingly to protect the integrity of INTG vegetation communities throughout the Project lifecycle.	Administrative	Within INTG TEC and Disturbance Footprint Within INTG Class B and throughout Disturbance Footprint	During construction. Ongoing, at least monthly	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained. Annual compliance reports must be submitted detailing management measures implemented.	Site Supervisor / HSE Manager	Adaptive management is not undertaken or documented after unforeseen impacts occurring to INTG resulting from construction or related activities.	Investigate and report all non-compliance. Review and revise this INTG Management Plan, and the INTG Monitoring program.

9.1 Pre-clearance Checks and Micro-siting

Infrastructure will be micro-sited (shifted and/or adjusted slightly) prior to construction works to further minimise/reduce impacts to MNES such as (but not limited to) INTG and INTG habitat, where possible. The purpose of micro-siting any infrastructure will be:

- To reduce potential impacts to MNES from the levels previously identified (i.e. the impact levels detailed in the EPBC referral documentation).
- To avoid other project constraints, such as buried artefacts or remains which may not be discovered until civil works begin.
- In case of unacceptable geotechnical conditions in a given position, such as an underground cavity.

Notwithstanding any of the above, Neoen commits that micro-siting will not increase impacts to MNES.

9.1.1 Proposed Approach

The majority of micro-siting has already been achieved through the design development process to date, and the design layout and disturbance footprint submitted as part of the EPBC referral reflects a largely complete design layout and infrastructure footprint. However, Neoen wishes to apply an adapting approach to further minimise impacts to MNES such as (but not limited to) INTG TEC and INTG's and their habitat, and therefore infrastructure may be micro-sited (shifted and / or adjusted slightly). The approach will be undertaken in the order of avoid, minimise and then mitigate as follows.

Pre-clearance Check survey:

- Conduct a Pre-clearance Check survey on site shortly before construction begins, with focus on areas where the Disturbance Footprint overlaps with the known location of INTG TEC.
- If an access track is located on the edge of INTG TEC, investigate the potential to shift or narrow the track slightly.
- If another infrastructure component is found to encroach on INTG TEC, such as hardstand or met mast, consider viability to relocate to less sensitive location nearby, or reduce / adjust proposed design to avoid or further minimise impact on INTG.
- If INTG not previously mapped is detected within the Disturbance Footprint, a Stop Work procedure will be in place. The area will be assessed for extent and likely impact and escalated to relevant manager. A review process may need to be undertaken, including ecological survey, with potential for variation to approvals.
- If information comes to light that indicates a reasonable opportunity to avoid said impacts, a micro-siting assessment will be undertaken.

Micro-siting assessment:

1. Consult with construction engineer to determine if the infrastructure can be micro-sited based on information gathered during the pre-clearance survey.
2. Aim to avoid impacts if there is a reasonable opportunity to do so.

3. Undertake additional pre-clearance surveys in areas determined as suitable for micro-siting if not previously assessed.
4. Pre-clearance surveys will also assess for presence of any other potential constraints such as EPBC listed threatened plant species, Pygmy Blue-tongue Lizards and cultural heritage, not currently known to occur in those locations.
5. Select feasible option with least impact on MNES.

9.2 Rehabilitation of Temporary Clearance

A Project specific Rehabilitation Management Plan will be made for the Project which identifies and addresses relevant issues for rehabilitation of temporary impacts following construction.

Rehabilitation of temporarily disturbed areas will include topsoil redistribution and weed control. Topsoil redistribution will occur as soon as reasonably practicable and no longer than two years following construction activities being completed in the area.

Rehabilitation for temporary clearance areas in INTG will incorporate additional measures to address the high priority and sensitivity of this vegetation association. Goals, targets, triggers and management actions for INTG rehabilitation are described in **Table 9.3**.

Success of rehabilitation is not a compliance condition associated with approvals, as all temporary impacts are fully accounted and offset in approved Native Vegetation Clearance Approval and EPBC Act Approvals. Monitoring is discussed in **Section 11.0**.

Table 9.3 INTG Rehabilitation Goals, Targets, Triggers and Management Actions

	Description
Goal	To restore INTG in areas of temporary clearance through natural regeneration, following spreading of topsoil derived from the original site.
Target	In INTG Class B and INTG Class C, return the area to its original condition, prior to construction, within 10 years of temporary impact ceasing.
Triggers	No natural regeneration of Lomandra tussocks observed during monitoring in disturbed temporary clearance within 5 years of rehabilitation commencing.
	Perennial native grass tussock density does not equate to more than or equal to one per square metre after five (5) years in INTG Class B.
	Declared weeds detected in rehabilitation areas.
	Disturbance resistant species or other broad-leafed herbs identified in the National Recovery Plan for INTG (Turner 2012) are not detected on site within 5 years of rehabilitation commencing.
	Grazing impacts (from native or introduced herbivores) identified as cause for low or unsuccessful establishment of native species, through grass tussock measurements.
	Any one of excessive sedimentation, erosion or dust deposition from ongoing use of adjacent road or infrastructure component identified in rehabilitation area.
Adaptive Management	• Investigate suitability for livestock fencing in areas of rehabilitating INTG. • Investigate suitability for grazing management in areas of rehabilitating INTG. • Investigate opportunities for revegetation works through planting of tube stock (native grasses, Lomandra and diversity plantings of herbaceous species).

	Description
Corrective Management	• Treatment (as deemed suitable) to areas identified as containing Declared weeds, or other weeds of environmental or site significance. • Treatment of any identified areas of erosion, sedimentation or dust deposition as per corrective actions identified in a site-specific Sedimentation, Erosion and Dust Management Plan, or as otherwise deemed suitable.

Rehabilitation will also be addressed in the future in a decommissioning management plan at the end of the Projects lifecycle. Neoen (or the operator at the time or decommissioning) will be responsible for all temporary impact, decommissioning and rehabilitation activities and expenses, including preparation of a Decommissioning Rehabilitation Management Plan using best practice methods at the time the operation ceases.

10.0 Operational Management Measures

Management measures to be implemented during operation are outlined in **Table 10.1**. The location, timing, frequency, and responsibility associated with each management measure is also listed.

Broad operational management measures applicable to GNWF will be detailed in an OEMP, which is yet to be prepared. The OEMP must be developed and approved prior to the commencement of wind farm operations.

Table 10.1 General Operational Management Measures

Operational Management Measures	Type	Location	Timing/Frequency	Monitoring Activity	Responsibility	Management Trigger	Corrective Action
General Management Measures							
Inductions: All staff and contractors will complete a detailed, site-specific induction which provides an overview of INTG TEC and potential impacts to INTG TEC as well as management measures associated with the protection of INTG TEC.	Administrative	Site Office.	Prior to commencing any work on site.	Daily checks must be undertaken to ensure that all new staff and contractors have completed site inductions prior to commencing any works on site.	EPC Contractor	Staff or contractor working onsite without having completed the required inductions.	Any staff member or contractor who has not completed the required site inductions must immediately stop work and cannot recommence until the induction has been fully completed.
Fact Sheets: Display a fact sheet on INTG TEC (including images of INTG TEC and mapping showing the location of INTG Class B and INTG Class C within the Project Area) at all Operation and Maintenance Facilities.	Administrative	On site notice boards and in lunchrooms	Weekly checks of noticeboards.	EPC Contractor	No factsheets or information available about INTG TEC on main noticeboards and/ or common areas.	Provide factsheets and information about INTG for all noticeboards and common areas.	Weekly checks of noticeboards.
Clearance Delineation and INTG Protection Measures							
Mapping and Spatial Data: Provide clear maps and spatial data indicating approved tracks, turnaround areas, car parks, equipment laydown areas and materials storage areas, as well as exclusion zones to ensure that no unapproved disturbances occur as a result of wind farm operational, and maintenance works which may affect INTG TEC.	Engineering	Provide to those involved in operational and maintenance works.	At the end of construction Ongoing	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented.	EPC Contractor / All staff	No clear maps or spatial data provided. Clearance, vehicle movements, or material storage occurring outside designated areas.	Provide clear maps and spatial data and ensure all staff and contractors working onsite have access to these resources. Stop work immediately and report all non-compliance. Investigate the cause of the non-compliance and implement measures to ensure all staff/contractors have access to accurate maps and spatial data before resuming work.
Identification and indication of Exclusion Zones: Identify and indicate exclusion zones around areas of INTG Class B which adjoin the final infrastructure footprint (noting that ALL native vegetation is protected and must be avoided outside of the operational areas).	Engineering	Where INTG Class B adjoins wind farm infrastructure	At the end of construction Ongoing	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented.	Supervisor / HSE Manager	No clear identification and indication of Exclusion Zones. Clearance, vehicle movements, or material storage occurring outside designated areas.	Provide clear signage and ensure all staff and contractors working onsite have access to these resources. Stop work immediately and report all non-compliance. Investigate the cause of the non-compliance and implement measures to ensure all staff/contractors have access to accurate maps and signage before resuming work.

Operational Management Measures	Type	Location	Timing/Frequency	Monitoring Activity	Responsibility	Management Trigger	Corrective Action
Weeds, Pest and Grazing Management							
Ongoing Weed Monitoring: Undertake periodic weed monitoring and control to mitigate potential impacts (e.g. spread) during wind farm operation which may impact INTG areas. Ensure all monitoring and control activities are recorded, including extent, date and findings. Ensure that any weed control uses a method which is in accordance with minimum disturbance techniques and does not have a significant adverse impact on INTG TEC.	Administrative	Within INTG TEC and throughout Project Area	During operations and maintenance	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	EPC Contractor	Missed weed monitoring commitment.	Undertake weed monitoring as soon as practicable after identifying missed commitment.
Vehicle and Equipment Hygiene: No vehicles will be required to work off existing formed roads during operation of the wind farm. Ensure all vehicles and maintenance equipment are clean and free of soil material, including materials containing weed seed or propagules, prior to arriving on site, and prior working in close proximity to INTG grasslands. If vegetative material or earth is present, ensure that the equipment is washed down at an appropriate offsite facility to prevent vegetative material or earth potentially containing weed seeds being brought into the site and into areas of INTG TEC.	Engineering	Site entrance and INTG TEC site boundary	Prior to arriving on site and prior to commencing works within, or in close proximity to, INTG TEC. As required	Vehicle and equipment inspections will be conducted by the Environmental Compliance Manager/Officer to identify any detect any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	EPC Contractor / All site personnel	Vegetative material or earth is identified on vehicles, earthmoving equipment and/or construction equipment.	Ensure vehicles and equipment are washed down at an appropriate facility prior to commencing work onsite to prevent vegetative material or earth potentially containing weed seeds being spread across the site and in close proximity to INTG grasslands.
Livestock Grazing Regimes: If a significant alteration of grazing regime (for example increased grazing or preferential grazing in particular areas) is observed and considered to be potentially impacting INTG, then it will need to be investigated by a suitably qualified ecologist and mitigation measures, or additional monitoring implemented where and if possible. Landholder to advise Neoen if any substantial changes to the usual grazing regime and / or placement of watering points is required because of the construction of GNWF. Proposed alternative locations will be reviewed by a suitably qualified ecologist to ensure no adverse impacts to INTG could be reasonably expected due to the proposed change. To ensure GNWF prevents, or minimises its impact on existing livestock grazing regimes, project infrastructure, such as hard stands and access tracks, shall not be used to install new watering points for placement of livestock feeders.	Administrative	Project Area	During operation. Ongoing As required	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	EPC Contractor, Neoen Community Liaison, Landholders	Changes to usual grazing regime and / or placement of watering points and/or fed lots is required because of the operations of GNWF.	If a water point or feedlot is relocated into ecologically sensitive areas, or if existing water points or feedlots within such areas (e.g., INTG habitat) are preferentially used by the landholder due to wind farm infrastructure, increased monitoring effort will be required to assess the impact of altered livestock management on these habitats.
Soil Erosion, Dust Management and Drainage Management							
Dust Deposition: Monitor for visual signs of dust deposition on INTG TEC within 50 m of Disturbance Footprint, during regular site auditing.	Administrative	INTG within 50 m of Infrastructure	Regular (monthly compliance checklists, quarterly inspections). Ongoing	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all dust management commitments are being implemented and maintained.	HSE Manager	Visual signs of dust deposition on INTG TEC within 50 m of Disturbance Footprint	Implement adaptive management measures such as reducing vehicle speeds and increasing road watering. Investigate and report on any impacts to INTG habitat which may result from dust deposition.
Traffic Speed Limits: A maximum speed limit of 40 km/hr enforced on all access tracks. For access roads within 200 m of INTG TEC, additional dust suppression measures will be imposed through either application of	Administrative	Project Area	During operation. Ongoing	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure	Site Supervisor	Traffic speed limits are not adhered to.	Reinforce the importance of adhering to site speed limits during pre-start and toolbox meetings.

Operational Management Measures	Type	Location	Timing/Frequency	Monitoring Activity	Responsibility	Management Trigger	Corrective Action
material binders along roads in these sections, or speed limits of 25 km/hr enforced using signposts, with monitoring for compliance.				all management commitments are being implemented and maintained.			
Disturbance or Soil and Vegetation: Minimise disturbance of soil and vegetation during all activities undertaken throughout operations (including vehicle access, general infrastructure, and site maintenance, weed control, fire management, grazing and fauna surveys) within the Project Area, particularly within areas mapped as INTG TEC, by: • only driving on designated vehicle access tracks; • minimising driving (walk where possible); • ensuring that all designated vehicle access tracks and site stormwater drainage is well maintained to prevent erosion and sedimentation from occurring; and • minimising digging and soil disturbance to only that which is required to implement the approved action, including ripping of rabbit warrens to control rabbits.	Engineering	Disturbance Footprint.	During operation. During all activities.	The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	Asset Manager (Neoen)	Unnecessary disturbance of soil or vegetation occurs outside designated areas or approved activities within the Project Area, particularly in INTG.	Stop work and investigate the reasons for unnecessary disturbance. Reinforce site access controls by clearly marking designated tracks and turnaround points. Conduct toolbox talks or pre-start briefings to remind staff and contractors of soil and vegetation disturbance protocols. Review and update erosion and sediment controls if disturbance has increased erosion risk. Stop work immediately and report the incident if disturbance occurs outside the approved Disturbance Footprint. Incident reporting for unnecessary disturbance must include the location, extent, and corrective measures taken, for compliance documentation and reporting.
Hazardous Materials and Dangerous Goods Management							
Hazardous materials and Dangerous Goods: Hazardous materials and dangerous goods containers and storage areas will be stored and managed in accordance with applicable Australian Standards, Safety Data Sheets and site-specific Safe Work Method Statements.	Engineering	Project Area	During Operation. Once	Weekly/daily site inspections will be conducted by the Environmental Compliance Manager/Officer to identify any non-compliance. The Environmental Compliance Officer/Manager will complete a compliance checklist on a regular basis (at least monthly) to ensure all management commitments are being implemented and maintained.	Asset Manager (Neoen)	Storage and management of hazardous materials/dangerous goods not compliant with Australian Standards, SDS, or SWMS. Hazardous material or dangerous goods spill in INTG TEC habitat.	Rectify storage immediately, update procedures, and reinforce compliance through toolbox talks. Document actions before resuming work. Contain and clean up spill using approved methods, notify relevant personnel, remediate habitat, and document incident for compliance reporting.
Rehabilitation Management (see Section 11.0)							

Operational Management Measures	Type	Location	Timing/Frequency	Monitoring Activity	Responsibility	Management Trigger	Corrective Action
Soil Stockpiles: INTG specific topsoil to be redistributed on areas of temporary clearance in associated patch of INTG, to initiate rehabilitation.	Engineering	Disturbance Footprint	As soon as practicable, within two years after ground disturbance. Once construction works have ceased in the area. As required	Rehabilitation sites will be monitored annually, for a minimum period of 10 years (commencing from the time of rehabilitation monitoring) by an independent, suitably qualified ecological consultant, after which the need for ongoing monitoring will be reviewed and discussed with the Department.	Site Supervisor / HSE Manager	INTG specific topsoil not redistributed on areas of temporary clearance, as per methods specified in the Rehabilitation Management Plan, within two years after ground disturbance.	INTG specific topsoil to be redistributed on areas of temporary clearance in associated patch of INTG, to initiate rehabilitation, as per methods specified in the Rehabilitation Management Plan, within two years after ground disturbance.
Weed Management: If soil or fill material stockpiles or temporary clearance areas become infested with weeds, ensure weed control is undertaken in accordance with minimum disturbance techniques and weed control work does not have a significant adverse impact on INTG TEC. Prioritise stockpile monitoring and weed management specific to INTG soil, and use hand-pulling techniques where possible to minimise potential damage to soil seedbank, required for rehabilitation activities.	Engineering	Soil stockpiles, temporary clearance areas.	Ongoing during construction As required	Rehabilitation sites will be monitored annually, for a minimum period of 10 years (commencing from the time of rehabilitation monitoring) by an independent, suitably qualified ecological consultant, after which the need for ongoing monitoring will be reviewed and discussed with the Department.	Site Supervisor / HSE Manager	Material stockpiles or temporary clearance areas become infested with weeds.	Investigate and report all non-compliance. Review and revise this INTG Management Plan, the INTG Monitoring program and the Rehabilitation Management Plan.
Monitoring: Maintain ongoing monitoring in areas undergoing rehabilitation following temporary construction impacts to ensure successful recovery and identify any need for adaptive management. Document all monitoring results and adjust management strategies accordingly to protect the integrity of INTG vegetation communities throughout the Project lifecycle.	Administrative	Within INTG TEC and Disturbance Footprint	During operation Ongoing	Rehabilitation sites will be monitored annually, for a minimum period of 10 years (commencing from the time of rehabilitation monitoring) by an independent, suitably qualified ecological consultant, after which the need for ongoing monitoring will be reviewed and discussed with the Department.	Site Supervisor / HSE Manager	No successful recovery of INTG TEC.	Investigate and report all non-compliance. Review and revise this INTG Management Plan, the INTG Monitoring program and the Rehabilitation Management Plan.

11.0 INTG Monitoring

Due to the short timeframes of construction at any one location, and the application of the mitigation measures outlined in this Plan, construction of GNWF is not expected to have impacts to the condition of INTG which would be detectable on long-term condition monitoring surveys.

11.1 Regular Auditing

The HSE Manager (or other relevant personnel) will audit and regularly report on the performance indicators in **Sections 7.0**, **9.0** and **10.0** and identify triggers for adaptive management, such as in instances of erosion, sedimentation, dust deposition, or weed outbreaks, that may be relevant to INTG monitoring and management measures. Triggers will result in corrective action, guided by advice from ecological consultants. Regular auditing methods to detect triggers for management across the construction site are indicated in the CEMP and will be incorporated into an OEMP for the operational phase of the wind farm. Some general management/auditing relevant to INTG monitoring are briefly summarized below:

- A baseline survey for weeds prior to construction will map the location and extent of Declared weed outbreaks.
- Opportunistic monitoring of new weed outbreaks and elevated dust levels.
- Quarterly weed monitoring (including photo points in high-risk areas such as wash-down areas, stockpiles and access tracks etc).
- Quarterly monitoring in temporary INTG clearance areas/rehabilitation areas (this will detect weed outbreaks and increased dust etc).
- Weed control in winter/spring or as required.

If the above listed monitoring/management indicates a decline in INTG condition near construction zones, further investigation will be triggered and adaptive management measures implemented (i.e. increased weed/dust control) where required.

11.2 INTG Monitoring Program

The INTG monitoring as part of this INTG Management Plan, will be targeted to monitoring progress at rehabilitation sites (each with a paired impact site and a control site), in areas of temporary clearance of INTG. An effective monitoring program will be implemented by the Project Owner (Neoen), or their designated proxy, and conducted by an independent, suitably qualified and experienced ecological consultancy. The purpose of this program is to monitor sites of temporary clearance within INTG patches to determine if rehabilitation measures are effective, to identify INTG condition near construction zones and to identify triggers to implement corrective adaptive management where required.

Temporary clearance accounts for 5.02 ha (INTG Class B and Class C) across the WF and OTL. Data will be collected across INTG monitoring sites designated within each patch of temporary clearance occurring within INTG. Following each monitoring event, results will be analysed to evaluate the

effectiveness of management actions within the INTG area and to identify any management deficiencies or opportunities for improvement.

The data collected during the INTG monitoring program will assist in making adaptive management decisions to ensure that INTG TEC condition within the GNWF Project Area is maintained and monitored for triggers at rehabilitation sites in areas of temporary clearance in INTG. Whilst there will be natural variation in INTG TEC condition (i.e. due to climatic factors), the aim is to rehabilitate temporary disturbance areas to a condition representative of pre-clearance condition. If a rehabilitation trigger is observed, then further investigation will be triggered, and management actions will be reviewed to determine potential causes and solutions. Management actions, where required, will then be altered and updated in the INTG monitoring program.

The Project Owner (Neoen) will work with the suitably qualified and experienced Ecological Consultancy to adapt INTG TEC management actions if required.

11.2.1 INTG Monitoring Sites

INTG monitoring sites will be established across the Project Area, in areas of temporary clearance in INTG Class B and INTG Class C ('rehabilitation sites'). Each rehabilitation site will include a paired 'impact' site, established approximately 30 m to 50 m from any infrastructure to detect any potential indirect impacts as a result of the wind farm, as well as a 'control' site, established at a suitable distance away from infrastructure to avoid impacts on INTG as a result of the Project. Impact and control sites will be established in the same patch of INTG as the rehabilitation site to enable like for like comparisons.

Based on the area of temporary clearance in INTG Class B and INTG Class C, the following sites will be established for INTG Monitoring:

- Six (6) INTG Monitoring sites in the OTL corridor (2 rehabilitation sites, each with an 'impact' and 'control' site).
- Twelve (12) INTG monitoring sites at the WF (4 rehabilitation sites, each with an 'impact' and 'control' site).

A baseline survey will be undertaken al all monitoring sites following disturbance to determine the initial condition of the sites and their trajectory over time, based on the land management taking place at the site or due to environmental conditions.

Different survey methodologies will be employed for the rehabilitation and impact / control sites, due to the nature of the temporary clearance areas being predominantly narrow and linear in nature, and assessment of rehabilitation sites will not be possible to be undertaken as per the Condition Class Assessment methods outlined in the National Recovery Plan for INTG.

Monitoring methods for the rehabilitation sites (**Section 11.3**) will include a standard photo point, annual traverse of the rehabilitated area to map any Declared weeds, erosion, sedimentation or other management concerns, and a 100 m transect to record perennial native grass tussock and Lomandra frequency per linear metre, reporting grazing, regeneration and species diversity.

Monitoring methods for the impact site and the control site (**Section 11.4**) will include a standard photo monitoring point and utilise standard methods outlined in the National Recovery Plan for INTG.

11.3 Rehabilitation Site Monitoring Method

The objective is to rehabilitate the temporary impact areas within INTG grasslands to reinstate their ecological condition to the same or like condition prior to clearance. This will be assessed through collection of data at rehabilitation sites, on the following ecological indicators of vegetation, based on the triggers presented in **Table 9.3** (page 59):

- Perennial native grass tussock frequency per linear metre.
- Basal width of perennial native grass tussocks (including Lomandra).
- Perennial tussock leaf height.
- Evidence of regeneration of Lomandra spp. tussocks.
- Presence of native herbaceous species.
- Presence of Declared weeds.
- Presence of erosion, sedimentation or excessive dust deposition.

Table 11.1 summarises these indicators and purpose of collecting these ecological indicator data as well as desired or undesirable trends observed.

Methods, summarised below, will include:

- photo point
- 50 m transect
- site traverse.

Methods may need to be modified depending on suitability and site layout, or further information obtained as result of ongoing consultation with relevant experts such as the Northern and Yorke Landscape Board. These methods will be assessed further at the time of monitoring commencement.

The rehabilitation sites will be surveyed annually during spring (ideally October) for a minimum period of 10 years (commencing from the time of rehabilitation monitoring) by an independent, suitably qualified ecological consultant, after which the need for ongoing monitoring will be reviewed and discussed with the Department. If successful rehabilitation has been demonstrated prior to this, the 10-year monitoring commitment may be reviewed.

Table 11.1 Rehabilitation Site Ecological Health Indicators, Purpose, Desired and Undesirable Trends

Indicator	Purpose	Desired Trend	Management Trigger	Corrective Action(s)
Perennial native grass tussock frequency per linear metre	Determine the number of perennial native grass tussocks per linear metre, compared to impact and control sites.	Increasing in first 5 years, and then stable and comparable to impact and control site.	Decreasing and not reaching conditions of impact and control site.	Investigate and report all non-compliance. Review the Rehabilitation Plan and revise if needed. Implement adaptive management actions, where required.
Regeneration of Lomandra spp. tussocks	Determine if indicator plant species characteristic of the community is naturally regenerating after disturbance, and compare to impact and control sites.	Regeneration observed.	No regeneration observed.	Investigate and report all non-compliance. Review the Rehabilitation Plan and revise if needed. Implement adaptive management actions, where required.
Basal width of perennial native grass tussocks (including Lomandra)	Determine if the size of perennial native grass tussocks (including Lomandra) is increasing over time, indicating regeneration and maturity, compared to impact and control sites.	Increasing in first 5 years, and then stable and comparable to impact and control site.	Decreasing and not reaching conditions of impact and control site.	Investigate and report all non-compliance. Review the Rehabilitation Plan and revise if needed. Implement adaptive management actions, where required.
Perennial tussock leaf height	Aims to detect changes in height – useful for determining grazing pressure.	Stable or increasing height.	Decreasing and not reaching conditions of impact and control site.	Investigate and report all non-compliance. Review the Rehabilitation Plan and revise if needed. Implement adaptive management actions, where required.
Presence of native herbaceous species	Determine if INTG associated herbaceous species are regenerating in disturbed areas, and compare to impact and control sites.	Present, increasing.	Absent, decreasing.	Investigate and report all non-compliance. Review the Rehabilitation Plan and revise if needed.

Indicator	Purpose	Desired Trend	Management Trigger	Corrective Action(s)
				Implement adaptive management actions, where required.
Presence of Declared weeds	Determine if Declared weed are becoming established in disturbed areas.	Absent, or decreasing.	Present or increasing.	Weed control will occur in winter and spring, or as required to control outbreaks. Investigate and report all non-compliance. Review the Rehabilitation Plan and revise if needed. Increase weed control, as part of the general management measures in the CEMP/OEMP and subplans, or as required. Implement adaptive management actions, where required.
Presence of erosion, sedimentation or excessive dust deposition	Determine if the ongoing activities at the wind farm are impacting the rehabilitation areas, and to identify if additional isolated or widespread management measures are applicable.	Absent.	Present.	Investigate and report all non-compliance. Review the Rehabilitation Plan and revise if needed. Review management measures in the CEMP/OEMP and subplans. Implement adaptive management actions, where required.

11.3.1 Photo Point

A photo point will be established at each site preferably facing south and aligned along predetermined transect lines which are within the area of temporary clearance. During each monitoring event, photographs will be taken at these points (marked with star droppers or photo point disks) to provide a visual record for comparison over time.

11.3.2 Transect

In linear areas of temporary clearance (i.e. along access roads), a 50 m transect will be established, marked permanently by the placement of three steel droppers at 0 m, 25 m, 50 m. Where temporary clearance areas do not meet these dimensions, alternative transect dimensions will be identified, suitable for the site. Surveyors will lay out a 50 m tape adjoining each of the droppers to ensure a consistent placement during each survey period.

Surveyors will walk along the transect recording:

- Perennial native grass tussock frequency of intercept with transect line (including *Lomandra* spp.). For each tussock data collected will include:
  - species
  - basal width
  - leaf height
  - distance along transect.
- Evidence of regeneration of *Lomandra* spp. tussocks, presence or absence.
- Presence of native herbaceous species, including species list.
- Presence of non-native species, including species list.

11.3.3 Site Traverse

All areas of rehabilitation in INTG will be traversed slowly either by vehicle, along existing roads which intersect Lomandra grassland, or on foot to record more general observations of site condition including:

- presence of Declared weeds
- presence of erosion, sedimentation or excessive dust deposition
- evidence of altered land use (i.e. new feed lots or watering points)
- opportunistic observations, for example, of native grazers (kangaroos) or their scats, along with feral animals such as foxes or rabbits (including their tracks, scats, and warrens), or of significant weed outbreaks or infestations.

Where applicable, data collection will include a GPS location, brief description of the observation type, and photograph.

11.4 Impact / Control Site Monitoring Method

11.4.1 EPBC INTG Condition Assessment

An INTG Condition Class Assessment will be undertaken at impact and control sites, to track the general condition of INTG within the Project Area over time with the aim to determine the Condition Class of INTG within the same patch over time, which may be impacted by a range of external factors such as climate or agricultural activity which are outside of the potential impacts as a result of the Project.

The impact and control sites will be surveyed annually during spring (ideally October) for a minimum period of 10 years (commencing from the time of rehabilitation monitoring) by an independent, suitably qualified ecological consultant, after which the need for ongoing monitoring will be reviewed and discussed with the Department. If successful rehabilitation has been demonstrated prior to this, the 10-year monitoring commitment may be reviewed.

The INTG Condition Class Assessment impact and control sites will be permanently marked with two steel droppers, demarcating a 50 m transect. If steel droppers are unable to be installed (i.e. due to landholder preferences) transects will be GPS marked. One end of the transect will be designated as a photo point, preferably facing in a southerly direction, to visually track condition over time.

The impact and control sites will include a 50 m transect and search area 25 m either side, comprising a total survey site area of 0.25 ha, in which the Condition Class Assessment will take place. The assessment will include:

- Perennial grass tussock counts along the 50 m transect.
- Estimate of Lomandra tussock density (percent cover) within the 0.25 ha site.
- Ramble survey to record and monitor the status of the INTG TEC condition class parameters as indicated in **Table 11.2**.

Table 11.2 Condition Classes for INTG TEC (DEWR 2007)

INTG Condition Class	Minimum Size	Diversity of Native Plant Species[1]	No. of Broad-leaved Herbaceous Species[1] in Addition to Identified Disturbance Resistant Species[2]	No. of Native Perennial Grass Species[1]	Tussock Count[3]
Listed Ecological Community (protected by the EPBC Act)					
A	≥ 0.1	> 30	≥ 10	≥ 5	≥ 1/m
B	≥ 0.25	> 15	≥ 3	≥ 4	≥ 1/m
Degraded Patches Amenable to Rehabilitation (not protected by the EPBC Act)					
C		> 5	No minimum	≥ 1	No minimum

1. As measured in a 50 m x 50 m quadrat (or equivalent).

2. The following species are identified as disturbance resistant species: *Ptilotus spathulatus forma spathulatus; Sida corrugata; Oxalis perennans; Convolvulus angustissimus; Euphorbia drummondii; and Maireana enchylaenoides.*

3. As measured along a 50 m transect.

11.5 Frequency and Timing of Monitoring

Monitoring events for rehabilitation, impact and control sites will be commenced at the completion of construction, following respreading of topsoil in areas of temporary disturbance. The timing of commencement of monitoring may need to be adjusted to account for variable timing of rehabilitation at sites across the Project Area.

Rehabilitation sites will be monitored annually, for a minimum period of 10 years (commencing from the time of rehabilitation monitoring) by an independent, suitably qualified ecological consultant, after which the need for ongoing monitoring will be reviewed and discussed with the Department. If successful rehabilitation has been demonstrated prior to this, the 10-year monitoring commitment may be reviewed. The INTG monitoring will be in addition to regular standard auditing undertaken by the HSE Manager, as per the CEMP/OEMP and subplans. If triggers are identified during INTG monitoring, corrective action or adaptive management actions will be assessed and implemented as required.

Rehabilitation, impact and control sites will be surveyed concurrently to (1) to enable comparisons of INTG conditions between sites within a patch (and determine success of rehabilitation over time) and (2) identify any trends in the condition of the patch of INTG grassland over the period of monitoring, which are outside of potential impacts from the Project (such as weed cover and abundance in relation to seasonal conditions).

Field work for monitoring events will be undertaken in spring (i.e., September/ October/ November), with the results of each monitoring event analysed post field survey and used to assess the effectiveness of management actions to identify any management failures or areas for improvement (and adaptive management) in a timely manner.

12.0 Adaptive Management

An adaptive management approach will be adopted to ensure the objectives of the INTG Management Plan, CEMP and OEMP (and subplans) are being achieved and to manage uncertainty. This involves adapting management actions(e.g. reducing vehicle speed, increasing road watering during periods of elevated dust) in response to the outcomes of the Pre-clearance Check Surveys, general audits and to unforeseen or unplanned management threats and issues/incidents, as well as to reflect advances in ecological research and land management technologies that may arise during implementation of this Plan. The need for adaptive management (and its implementation) will be identified as part of the review and revision of this Plan, as detailed in **Section 5.4**.

A suitably qualified and experienced Ecological Consultancy will review the results of the monitoring program and, if required, recommend changes to relevant management actions. Where appropriate, the Project Owner will implement minor amendments to management actions, such as increasing weed control effort, upon advice from the Ecological Consultancy and in line with the steps outlined in **Section 5.5**, where required.

This adaptive management approach will assist with managing short-term changes in condition of the INTG TEC associated with poor climatic conditions such as drought and/or good climatic conditions such as above average rainfall, so that the INTG TEC continues to be maintained and, where possible improved.

13.0 Reporting

13.1 Monthly Compliance Checklists

To ensure the objectives of the INTG Management Plan are met, monthly compliance checklists will be prepared by the Environmental Compliance Manager/Officer. Monthly compliance checklists will document compliance activities, monitoring results, and corrective actions, as part of the INTG Management Plan (and associated MPs).

Monthly compliance checklists be included and documented in the INTG Management Plan Annual Compliance Report, where relevant.

13.2 Quarterly Internal Report

To ensure the objectives of the INTG Management Plan are met, quarterly internal reports will be prepared by the Environmental Compliance Manager/Officer that document compliance activities, monitoring results, and corrective actions, as part of the INTG Management Plan (and associated MPs).

Quarterly internal reports be included and documented in the INTG Management Plan Annual Compliance Report, where relevant.

13.3 Third-party Audit

A third-party audit will be undertaken biannually during construction of GNWF.

Third-party audits will be included and documented in the INTG Management Plan Annual Compliance Report, where relevant.

13.4 Annual Compliance Report

To ensure the objectives of the INTG Management Plan are met, the Project Owner will submit an Annual Compliance Report to the Department on an annual basis, which must detail the results of the management actions implemented as part of the INTG Management Plan (and associated MPs), and any minor amendments to management actions, such as weed control effort, to the Department, for the first ten years (as a minimum) of wind farm construction and operations.

The data collected during the INTG monitoring program will assist in making adaptive management decisions to ensure that INTG TEC condition within the GNWF Project Area is maintained and monitored for triggers at rehabilitation sites in areas of temporary clearance in INTG.

The INTG Management Plan Compliance Report will:

- Assess and summarise management actions undertaken during that reporting period and discuss the outcome of those actions (including whether actions are adequate or inadequate (i.e. demonstrate compliance and / or document any breaches), including but not limited to:
    - Pre-clearance Checks Surveys

- Micro-siting effort
- Revegetation efforts.

- Detail the relevant management and monitoring methodology.
- Collate the management action results (descriptive statistics), including:
  - Any trends in INTG TEC Condition observed.
  - Comparison to previous results collected to date.
  - Identify any trends in the INTG condition at rehabilitation, impact and control sites.
- Recommend any minor amendments to management actions for the Project Owner (Neoen) to consider and if appropriate, implement.
- Document any minor amendments to monitoring methods or management actions that are to be implemented (after consideration and approval by the Project Owner(Neoen)).

Monitoring data will be prepared in accordance with the Guidelines for biological survey and mapped data (Commonwealth of Australia 2018) and provided to the Department on an annual basis.

Monitoring may also be supplied to the State authority DEW, NVC in support of actions presented for mitigation to native vegetation clearance.

13.5 Incident Reporting and Non-compliance

For non-compliance incidents (e.g. if ground disturbance occurs without a pre-clearance check), a stop-work procedure will be implemented, the incident investigated, corrective measures will be implemented and reported to DCCEEW by the Environmental Compliance Officer/Manager.

Any incidents and non-compliance with this Plan will also be included and documented in the INTG Management Plan Annual Compliance Report.

The review and revision of this INTG Management Plan, and submission and publication is described in **Sections 5.4** and **5.5**.

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Appendix 1

Iron-grass Natural Temperate Grassland Patches

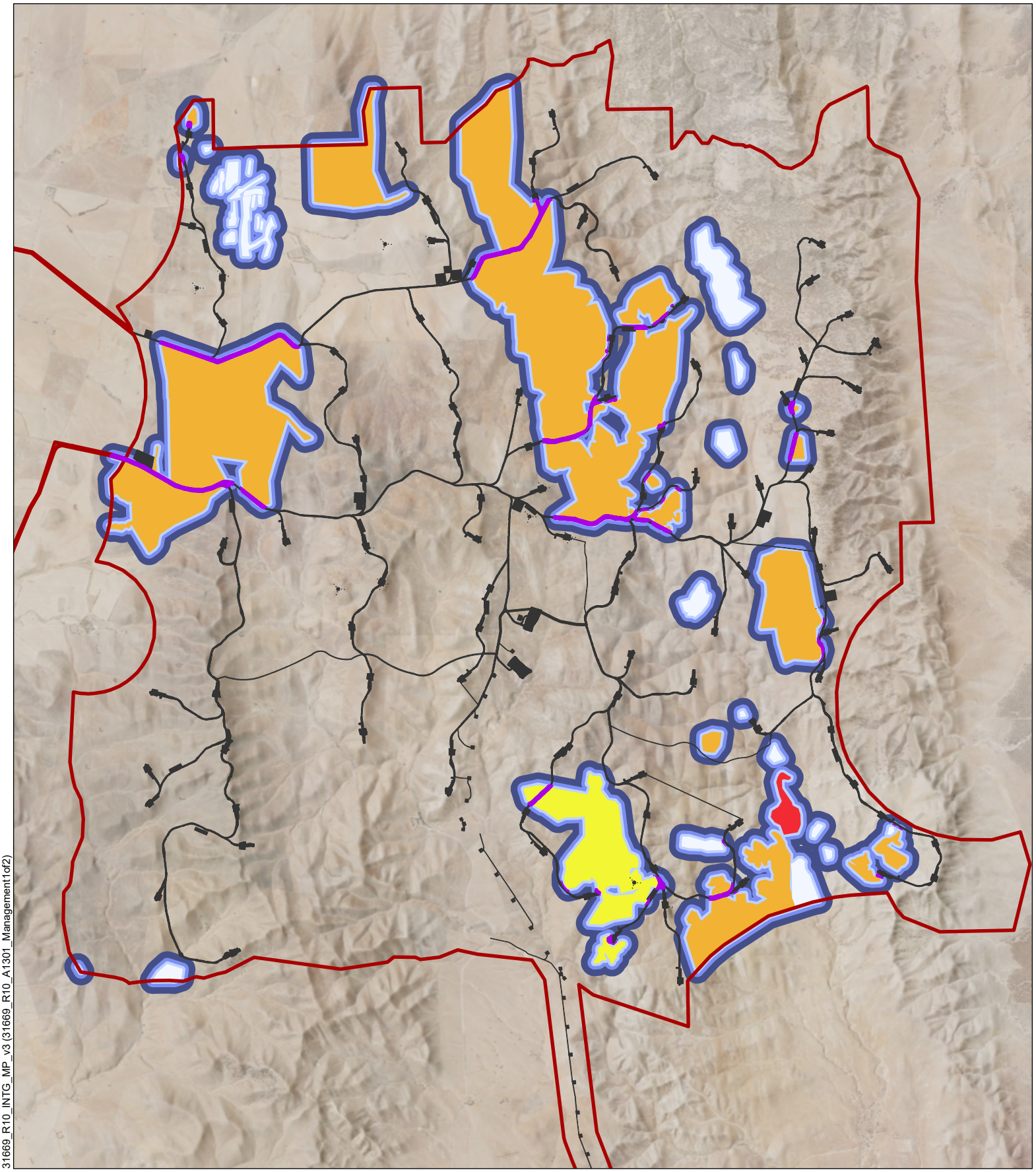
umwelt

INTG Patch #	Survey Site(s)	Landholder Details	INTG TEC Condition Class	Area (ha) (Before Any Impact)	Impacted
1	LOM22	[redacted]	Class C	40.28	Yes
2	LOM27	[redacted]	Class C	13.40	
3	LOM26	[redacted]	Class C	19.39	Yes
4	LOM24, A6e	[redacted]	Class C	66.10	Yes
5		[redacted]	Unsurveyed	7.07	
6		[redacted]	Unsurveyed	0.05	
7	LOM13	[redacted]	Class C	7.46	Yes
8	LOM10, A6c	[redacted]	Class B	116.32	Yes
9		[redacted]	Unsurveyed	18.28	
10	LOM9	[redacted]	Class B	7.28	
11		[redacted]	Unsurveyed	0.94	
12	LOM8	[redacted]	Class B	10.38	
13	LOM14, LOM15	[redacted]	Class C	161.01	Yes
14		[redacted]	Unsurveyed	7.55	
15		[redacted]	Unsurveyed	0.58	
16		[redacted]	Unsurveyed	1.42	
17	LOM7	[redacted]	Class A	18.02	
18		[redacted]	Unsurveyed	2.22	
19	LOM5	[redacted]	Class B	6.43	
20		[redacted]	Unsurveyed	0.40	
21	LOM3, A6b	[redacted]	Class B	105.76	
22		[redacted]	Unsurveyed	10.14	
23	LOM28	[redacted]	Class B	0.24	
24	LOM16	[redacted]	Class B	12.84	Yes
25	A6f	[redacted]	Class B	99.33	Yes

INTG Patch #	Survey Site(s)	Landholder Details	INTG TEC Condition Class	Area (ha) (Before Any Impact)	Impacted
26		[redacted]	Class B	1.80	
27	LOM2	[redacted]	Class B	4.32	Yes
28		[redacted]	Unsurveyed	6.02	
29		[redacted]	Class B	324.73	Yes
30	LOM1	[redacted]	Class B	0.69	Yes
31		[redacted]	Unsurveyed	1.77	
32	LOM17, LOM18, A6a	[redacted]	Class B	527.50	Yes
33	LOM19	[redacted]	Class B	27.45	
34		[redacted]	Unsurveyed	42.42	
35	D6a	[redacted]	Unsurveyed	10.25	
36		[redacted]	Unsurveyed	1.51	
37		[redacted]	Unsurveyed	0.24	
38		[redacted]	Unsurveyed	0.31	
39		[redacted]	Unsurveyed	1.55	
40		[redacted]	Unsurveyed	0.55	
41		[redacted]	Unsurveyed	0.50	
42		[redacted]	Unsurveyed	1.67	
43		[redacted]	Unsurveyed	1.60	
44		[redacted]	Unsurveyed	0.82	
45		[redacted]	Unsurveyed	1.19	
46		[redacted]	Unsurveyed	5.47	
47		[redacted]	Unsurveyed	0.37	
48		[redacted]	Unsurveyed	0.23	
49	LOM6, LOM23 A6g	[redacted]	Class B	232.78	Yes
50		[redacted]	Unsurveyed	0.39	
51	D6b	[redacted]	Class B	2.22	Yes

Appendix 2

INTG Management Zones



GNWF
Disturbance Footprint
25km/h speed zone

INTG Condition
Class A
Class B
Class C
Unsurveyed

INTG Buffer (m)
50
100
200

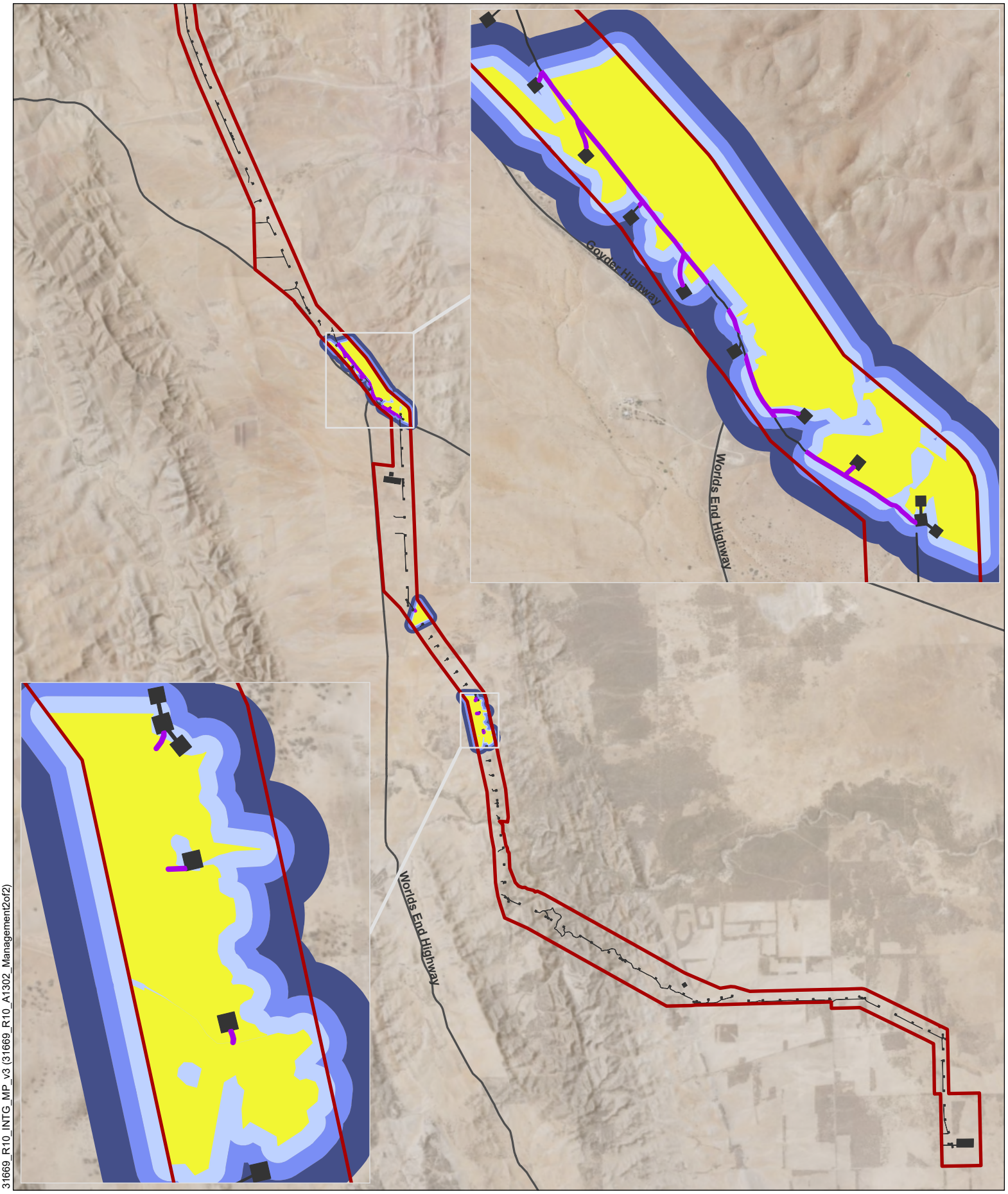
Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 21/08/2025 11:17 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 1 2 km

31669_R10_INTG_MP_v3 (31669_R10_A1301_Management1of2)



GNWF
Disturbance Footprint
25km/h speed zone

INTG Condition
Class C

INTG Buffer (m)
50
100
200

umwelt

Data Source: Umwelt (2025), ESRI (2025), DEW (2022), DIT (2022) Neoen (2025)
Date Exported: 21/08/2025 11:17 AM
Created by: sophie.haswell

GDA2020 MGA Zone 54

N

0 2 4 km

31669_R10_INTG_MP_v3 (31669_R10_A1302_Management2of2)

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