15 December 2025

[redacted]

[redacted]

Environment Regulation Division | Environment Assessments West Branch | SA & NT Section
Department of Climate Change, Energy, the Environment and Water
Kaurna Country, 60 King William St Adelaide SA 5000

via email: [redacted]
cc: [redacted], [redacted]

RE: Response to public comment received for the Goyder North Wind Farm Preliminary Documentation (EPBC 2024/09929)

Dear [redacted]

Neoen Australia Pty Ltd (Neoen) proposes to develop the Goyder North Wind Farm (GNWF) (the Action, the Project) in the Mid North of South Australia, approximately 150 km north of Adelaide, and approximately 5.5 km north of Burra. The Action will comprise up to 99 wind turbine generators (WTGs) and a Battery Energy Storage System (BESS), and other supporting infrastructure (including internal roads, laydown areas, batch plants, stockpile areas, meteorological masts, underground cabling and a collector substation) within the Wind Farm (WF). Additionally, a 275 kV or 330 kV multi-circuit Overhead Transmission Line (OTL) will connect the WF to the Bundey Substation near Bundey, over an alignment of approximately 48 km, and would include other supporting infrastructure such as roads and tracks.

The GNWF would represent part of Neoen's wider Goyder Renewables Zone (GRZ) in the Mid North region and includes the approved, and currently under construction, Goyder South Hybrid Renewables Energy Project (GSHREP), the latter located to the south of Burra.

Summary of EPBC Act approval pathway to date

The Project was referred to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (Cth) on 8 July 2024, then entitled the Goyder North Renewable Energy Facility Stage 1, Burra, SA (EPBC 2024/09929). Based on information at the time of the referral, the Project was considered a 'Controlled Action', with relevant controlling provisions being: Listed threatened species and communities (sections 18 and 18A of the EPBC Act), and that the assessment approach under the EPBC Act would be through preliminary documentation. A summary of the assessment under the EPBC Act to date is provided in Table 1.

Table 1: Summary of Assessment to-date for GNWF

Date	Activity/Description	Comment
8 July 2024	Neoen's GNWF EPBC Referral (EPBC 2024/09929)	Referral of the Project to construct, operate and decommission a wind farm facility including 92 wind turbine generators (WTGs), a battery energy storage system (BESS), transmission lines, substations and ancillary infrastructure, approximately 5.5 km north-east of Burra, South Australia.
23 August 2024	DCCEEW resubmission request	Email from DCCEEW advising the referral did not meet the requirements to be considered a valid referral under the EPBC Act, and as such sought clarification on some aspects of the referral. This included information relating to mapping and figure development, heritage and terminology.
10 October 2024	Neoen resubmission of EPBC Referral	EPBC Referral Resubmission, including supporting documentation to address items outlined in DCCEEW's resubmission request table.
14 November 2024	Notification of referral decision from DCCEEW	Notification of referral decision received from DCCEEW advising that the referral decision: • was considered a controlled action for Listed threatened species and communities (sections 18 and 18A EPBC Act) • the Project would be assessed by preliminary documentation.
5 December 2024	Letter from DCCEEW requesting further information for preliminary documentation for GNWF	Request for information (RFI) regarding the GWNF, as outlined in Attachment A of the letter. The RFI was principally associated with design elements that were still to be finalised at the time of the referral (such as overhead transmission line route, and the final disturbance footprint), and the potential impact to Matters of National Environmental Significance (MNES).
9 April 2025	Neoen's Request for Variation	Request for Variation under Environment Protection and Biodiversity Conservation Regulation 2000 – Regulation 5.08 Information for a request to vary a proposal to take an action. Specifically, the variation included provisions for: • expansion of the proposed action area • addition of up to 7 WTGs • removal of a transmission line from the proposal (the OTL-Alternative) • changes to the layout of WTGs and infrastructure components • addition of meteorological masts.

Date	Activity/Description	Comment
4 June 2025	Notification of variation of proposal to take an action from DCCEEW	Approval from DCCEEW accepting the 'varied proposed action', to construct, operate and decommission a wind farm facility, including up to 99 wind turbine generators (WTGs), a battery energy storage system (BESS), transmission line, substations and ancillary infrastructure, approximately 5.5 km north-east of Burra, South Australia.
12 September 2025	Submission of Neoen's draft Preliminary Documentation (V0)	Submission of Neoen's draft Preliminary Documentation (V0) in response to the RFI dated 5 December 2024, for internal review (and comments if required) by DCCEEW.
26 September 2025	Email and attachment from DCCEEW regarding a Re-issued RFI	Email and attachment from DCCEEW outlining parts of the Preliminary Documentation that were considered 'suitable for publication' and further requests for information / clarification on aspects of the Project and its potential interactions with MNES.
12 October 2025	Resubmission of Neoen's Preliminary Documentation (V1)	Resubmission of Neoen's Preliminary Documentation (V1), addressing all elements within the Re-issued RFI.
16 October 2025	Notification from DCCEEW that the Preliminary Documentation was considered acceptable for publication	Notification from DCCEEW that the Preliminary Documentation was considered acceptable for publication, and that Neoen could publish and disseminate information to the public regarding publication of the Preliminary Documentation and details regarding public comment.
22 October 2025	Neoen published the notification for publication and invitation for public comments	Neoen's Notification for publication of preliminary documentation under the EPBC Act, and Invitation for Public Comments for a period of 20 business days up to and including Wednesday 19 November 2025, in accordance with Section 95A(3) of the EPBC Act.
19 November 2025	Close of public comment period	A total of 11 response submissions to the invitation for public comment were received by close of business on 19 November 2025, with another received later that same date. The Government of South Australia Department of Environment and Water (DEW) advised that their submission would be received approximately the following day. The DEW submission was received 24 November 2025.

The Preliminary Documentation was made available for public comment on Wednesday 22 October 2025 for a period of 20 business days, up to and including, Wednesday 19 November 2025, in accordance with Section 95A(3) of the EPBC Act. Preliminary Documentation materials were made available to the public:

- at the Goyder Regional Council Chamber, 1 Market Square Burra S.A. 5417
- at the State Library of South Australia, North Terrace, Adelaide S.A. 5000
- online at goyderenergy.com.au/documents and https://goyderenergy.com.au/2025/10/21/invitation-for-public-comments.

Public comments received

A total of 13 response submissions to the invitation for public comments were received, including those from 9 individuals, 3 government agencies, and one threatened species recovery team. In addition, one telephone inquiry was received that was unrelated to the Project and no submission was made. All submissions received are included herein as Attachment 1.

Individual submissions generally contained a range of individual comments and/or concerns regarding the Project. Topics varied from general opposition to wind farm developments, acknowledgement of rigorousness of surveys and assessments (PBTL Recovery Team), to varying levels of concern regarding the development of the Project. All submissions were received by close of business 19 November 2025, with the exception of two submissions; one from an individual member of the public (which was received at 9:41 pm on 19 November 2025), and the Government of South Australia Department for Environment and Water (DEW), whose submission was received on 24 November 2025 (noting DEW informed Neoen the submission would be received after the submission period).

It is noted that a number of public comments cited concerns regarding the area of clearance required that would impact MNES, however the comments incorrectly cited the documentation which was provided at the time of the referral, rather than those provided in the Preliminary Documentation (e.g. impacts to Iron-grass Natural Temperate Grassland (INTG) Threatened Ecological Community (TEC) impacts referenced in comments were incorrect).

Within the 13 public submissions, Neoen were able to separate out approximately 114 different comments, noting that the topics of comments were often overlapping or intertwined so exact numbers could not be determined. Full versions of the submissions received are provided in Attachment 1 to this letter, with Table 2 providing a summary of the individual comments received.

Broad topics noted in the public submissions relevant to MNES, or associated with potential impacts to MNES included:

- potential trade of endangered species by construction personnel
- impacts to Iron-grass Natural Temperate Grasslands of South Australia (INTG) Threatened Ecological Community (TEC) (and broadly Lomandra grasslands)
- impacts to the Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis*) (PBTL)
- impacts to the Flinders Ranges Worm-Lizard (*Aprasia pseudopulchella*) (FRWL)
- management of weeds, particularly Declared Weeds (under the *Landscape South Australia Act 2019* (SA) (LSA Act), and Weeds of National Environmental Significance (WoNS), and their associated threat to MNES species and species habitat

- habitat fragmentation and edge effects
- rehabilitation, including rehabilitation of INTG TEC/Lomandra grasslands
- impacts to nearby conservation areas (namely Mokota Conservation Park, Mimbara Conservation Park, Tiliqua Nature Reserve, Mongolurring Nature Reserve) and potential consequences to MNES
- cumulative impacts to MNES
- offsets, management of offsets, and the proposed offset strategy under the EPBC Act
- a number of other MNES (including those that have not previously been recorded within the Project Area), such as Blue-winged Parrot (*Neophema chrysostoma*) (BWP) (not recorded during surveys), Diamond Firetail (*Stagonopleura guttata*) (not recorded within Project Area but detected outside of GNWF within adjacent search area during Mallee Bird Community targeted surveys), Southern Whiteface (*Aphelocephala leucopsis*) (recorded during surveys), and Plains Wanderer (*Pedionomus torquatus*) (not recorded during surveys)
- bird strike and post-construction monitoring, including impacts to MNES
- visual impacts on Burra, with regards to Burra being Heritage Listed as the Australian Cornish Mining Sites: Burra.

In addition to the EPBC/MNES comment topics listed above, a number of the public submissions included comments which were not associated with MNES listed under the EPBC Act (and as such, no revision to the Preliminary Documentation regarding these matters has taken place). These included:

- state matters, such as reference to Neoen having submitted an application under the *Hydrogen and Renewable Energy Act 2023* (SA) (HRE Act) (i.e. approval under the *Planning, Development and Infrastructure Act 2016* (SA) (PDI Act) will be transferred to the HRE Act for regulatory approval and compliance)
- state matters, such as concerns about the Significant Environmental Benefit (SEB) Offset which is proposed under the *Native Vegetation Act 1991* (SA)
- state matters, including concerns regarding a number of species that are not listed under the EPBC Act, such as Southern Hairy-nosed Wombat (*Lasiorhinus latifrons*) (SHNW), Wedge-tail Eagle (*Aquila audax*), Elegant Parrot (*Neophema elegans elegans*), Australian Bustard (*Ardeotis australis*) and the undescribed giant worm
- requests for further consultation and involvement with a number of stakeholders, including the Northern and Yorke Landscape Board (NYLB) (particularly those members familiar with the Murray Darling Basin Plan 'Matter 8' asset / Burra Creek Catchment), and the Murraylands and Riverland Landscape Boards (MRLB), and the Pygmy Blue-tongue Lizard Recovery Team
- hydrology, Burra Creek Catchment, landscape changes, and climate variability
- water supply for construction works
- one comment was not related to the Project, but rather the use of the Margaret Graham building at Lot 14, where the Neoen office is located
- potential impacts on tourism.

Irrespective of the topic, Neoen has acknowledged all public comment submissions received, and has addressed each submission, in accordance with Section 95B of the EPBC Act. Where comments require further information than that previously provided, the Preliminary Documentation and/or supporting documents have been updated to include additional content, or revised content where new information is now available (e.g. approach to achieving offsets). Table 2 includes where changes to the documentation have been made.

Yours sincerely

[redacted]

[redacted]

[redacted]

Neoen Australia Pty Ltd

Table 2: Summary of Public Comments and Neoen Response

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
22/10/2025	[redacted]	Not relevant	Comment is unrelated to Neoen or the GNWF project.	Caller rang toll-free number printed in The Advertiser regarding a need for respite area in the Margaret Graham building at Lot 14 for women with menopause. It was clarified over the phone that this was the EPBC Public Comments Submission process, after which the caller hung up.	No response required - non EPBC related matter	No change to PD required.	Not Applicable
25/10/2025	[redacted]	Poaching and illegal wildlife trade	Comment is anti-Neoen and anti the project, while focused on MNES, the comment is derogatory to the credibility and dependability of Neoen.	[redacted] outlines that Australia is a signatory to the Convention on International Trade in Endangered Species of Wild Fauna and Flora. Within the Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community Assessment (June 2025) and the Ecological Assessment Report (Sept 2025), he has highlighted wording relating to INTG, FRWL, PBTL, Small Scurf-pea and Trailing Hop-bush, SHNW, and Wedge-tailed Eagle. The key issue raised relevant to MNES is that there is no reference made to the trade of endangered species (specifically the PBTL and SHNW). The commenter suggests that controls (aligning with the trade agreement) should be put in place to ensure that workers do not trade individuals of these species.	Neoen acknowledge [redacted] concern regarding Australia's obligations under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and the suggestion that controls should be implemented to prevent workers from trading individuals of threatened species. The key point raised—that no reference is made to illegal trade of endangered species within the project documentation—is not correct. Poaching of PBTL is identified as a key threatening process within Section 4.1.5 of the Project Document (PD), and again in Section 5.2.11 as an indirect impact that may potentially arise as a result of the Project (page 269 of the PD). The impacts of GNWF on illegal poaching of PBTL are further addressed in Section 7.1.2.5 (page 351 of the PD), which concludes that there is minimal risk of elevated poaching associated with the Project. The GNWF occurs on private land parcels that are fenced and occupied by landholders. Data regarding the species is already largely in the public domain, but where Neoen has provided documentation, redacted versions have been used to protect sensitive information. The PD also references reporting mechanisms at regional, state, and Commonwealth levels in the event that poaching or illegal wildlife trade is detected. Additional controls are embedded in the PBTL Offset Management Plans (currently in draft form for DCCEEW review), which include surveillance cameras, security signage, and monitoring of footage as an extra precaution, particularly at offset sites where landholders or land managers may not be present frequently. Whilst surveillance activities may not prevent poaching activities, the signage aims to deter potential offenders, and any surveillance footage would be of sufficient quality to provide as part of a police report, if required (for example, showing vehicle details, date and time). Further measures are being incorporated into the CEMP, OEMP and PBTL MP, including requirements for all contractor personnel to sign confidentiality agreements. These agreements will specifically include provisions relating to the confidentiality of threatened species' presence and locations (MNES and NPW-listed species). Additionally, during construction the site will be manned during the day, typically with security guards present. During operation, operational personnel will be active across the project area typically during week days. During both construction and operation stock gates will be closed and surveillance cameras will be in operation near the substation and other operations areas, and security measures consistent with critical infrastructure and essential services requirements. In summary, poaching and illegal trade risks have been explicitly considered in the PD, controls are already in place through offset management and site security, and further measures are being added to ensure compliance with CITES obligations and protection of threatened species. No comments regarding the illegal trade of SHNW are made within the Preliminary documentation, as this species is not a MNES and is therefore not the subject of the documentation.	Yes	Updates have been made to Attachment 13 of the PD (the PBTL Management Plan), in part in response to comments received on the draft versions of the MP, but also to reflect additional mitigations proposed to reduce the risk of illegal trade or poaching of lizards. Updates include requirement for all staff to sign confidentiality agreements regarding data and ecological reports, and the use of surveillance cameras and security signage around the site. Additional detail has been incorporated to reflect that during construction and operation, the site will be staffed during the day with locked gates along access roads, surveillance cameras near the substation and other operations areas, and security measures consistent with critical infrastructure and essential services requirements. The EPBC Offset Management Plans (in draft) have also considered potential risk for illegal wildlife trade and incorporate specific surveillance and reporting measures to mitigate this risk. Section 5.2.11 and Section 7.1.2.5 of the PD have also been updated to summarise these changes.
18/11/2025	[redacted]	Disturbance to INTG TEC	Comment is broadly supportive of the wind farm but raises concern relating to MNES in a constructive manner.	In his submission, [redacted] cites impacts to ~12 ha of permanent disturbance and 18 ha of temporary disturbance to the INTG TEC. [redacted] states he is against any impacts to the INTG TEC, and has the view that consultants that are engaged by the proponent tend to underreport species diversity and cover (generally, not necessarily specific to GNWF), and has concerns that Type C INTG should be included. Ideally he would like to see independent reporting to improve the credibility of reports put forward from the proponent and their consultants.	Regarding impacts to 12 and 18 ha of INTG, the comment received has incorrectly referenced the initial referral rather than the Preliminary Documentation. A total of 8.59 ha of Vegetation Association 6 (Lomandra Grassland) will be impacted by the Project, comprised of 6.14 ha of Class B (i.e. TEC) (of which 2.43 ha is permanently impacted and 3.72 ha will be temporarily impacted), and 2.44 ha of Class C (not considered to meet the criteria for TEC, of which 1.14 ha will be permanently impacted, and 1.30 ha will be temporarily impacted). Areas subject to temporary disturbance, i.e. total 5.02 ha, will be amenable to rehabilitation (which may be long term), but it is noted that the temporarily disturbed TEC (i.e. the class B disturbance) is included in the EPBC offset calculations, in the event that it does not successfully rehabilitate back to INTG which is representative of the TEC. No Class A TEC will be impacted by the Project. A total of 3.57 ha of VA6 (i.e. any Lomandra Grassland) will be permanently impacted. Significant design and refinement of the Project has been undertaken, right up to submission of the PD. Impacts to VA6 / any Lomandra Grassland, including the INTG TEC occur as relatively 'small' patches across the entire Project Area, rather than a continuous patch, or resulting if further fragmentation of VA6. It should be noted that approximately 1,922.65 ha of VA6 will not be directly impacted by the Project and will be retained. As such, impacts as a result of the Project equate to approximately 0.41% of the total VA6 area mapped within the GNWF, equating to approximately 0.12% of the entire mapped INTG TEC and up to 0.02% of the Lomandra Grassland (all condition classes) mapped in the region. The INTG Management Plan addresses a range of potential impacts which are mitigated for or where controls are put in place to avoid direct and potential indirect impacts. The residual impacts to INTG are to be offset by establishing conservation reserves over land containing INTG, as required under the EPBC Act, and outlined in the INTG Offset Management Plan (which the commenter has not had the opportunity to see). Offsets for INTG have been socialised with DCCEEW on several occasions, and will also occur at the Projects SEB offset area (outside of the EPBC required offsets). Targeted rehabilitation measures are proposed for INTG restoration, and/or improvement in condition, both within the Project Area and Offset property(is). Measures are outlined in the INTG MP and INTG Offset MP.	No change to PD required	Not applicable
		SEB and possible removal of stock grazing activities on native grasslands		[redacted] states he has concerns regarding the removal of stock grazing from the SEB area - and states this as a fundamental error, i.e. that native grasslands require grazing or a substitute grazing to survive.	The SEB area is not the subject of the EPBC assessment, or the PD and associated documents. A key component of the ongoing management of the Project Area, particularly across the WF and Offset properties (EPBC and SEB), includes the management of grazing regimes for PBTL in accordance with the Best Practice Management Guidelines (Schofield 2006), and expert advice. Neoen acknowledge [redacted] concern regarding the removal of stock grazing from the SEB area and his view that native grasslands require grazing or a substitute to remain healthy. The Native Vegetation Clearance Data Report referred to was prepared in February 2025, prior to the completion of full ecological surveys of the site. As such, Section 7.6 Environmental Benefits reflects the minimum management obligations outlined in the NVC SEB Management Template, which includes removal of stock unless ecologically beneficial grazing is identified in a site-specific SEB Management Plan. Since then, comprehensive ecological surveys have been undertaken and an SEB Management Plan has been drafted and submitted to the NVC. The plan has received positive feedback and specifically incorporates ecologically beneficial grazing as a key management tool for INTG and PBTL habitat. The proposed grazing regime is based on the PBTL Best Practice Management Guidelines for Landholders (Schofield, 2006) and other relevant literature. It involves short-duration, high-intensity rotational grazing designed to reduce seed set of non-native annual grasses and maintain open inter-tussock spaces. Importantly, triggers for initiating grazing (such as rainfall timing and tussock height) are being developed in consultation with grassland experts to ensure ecological objectives are met. The SEB Management Plan also establishes ongoing monitoring and periodic consultation with experts, including those from the Northern and Yorke / Murraylands Landscape Boards. This adaptive management approach ensures that grazing practices remain responsive to ecological outcomes and can be adjusted if required. In summary, while the initial report reflected template obligations, the final SEB Management Plan recognises the ecological importance of grazing and incorporates a tailored regime to support the long-term health of native grasslands. As outlined above, the INTG MP specifically addresses a range of potential impacts which are mitigated for / controls put in place to avoid direct and potential indirect impacts. This includes consideration of the potential for altered grazing regimes as a result of the wind farm infrastructure layout, such as changed placement of watering points or altered fencing locations to accommodate infrastructure. The site is subject to ongoing agricultural grazing and Neoen is unable to predict or influence the specific grazing regime implemented by the landholder, which may be subject to change, irrespective of the wind farm, over time. Periodic monitoring of rehabilitation areas, potential indirect impact areas, and control sites will aim to detect any changes which may be occuring as a result of the wind farm.	No change to PD required	Not applicable
		SEB offset		[redacted] outlines that the SEB proposal floated for Mount Bryan East involves land that is mostly not suited to native grassland. Further that the offset cost is too low to achieve the environmental gain put forward.	The SEB area for Mount Bryan East is not the subject of the GNWF EPBC assessment, or the PD and associated documents. It is important to note that this SEB forms part of a broader offset package. While the site may not be optimal for native grassland establishment, it nonetheless provides significant environmental benefit by protecting land that has historically been managed for agriculture rather than conservation, and incorporates multiple other vegetation associations comparable to those within the GNWF, and / or providing habitat for similar flora and fauna species. In protecting this property, the SEB contributes to improved ecological outcomes by connecting and buffering existing protected areas, including Caroona Creek Conservation Park and several Heritage Agreement Areas. The offset cost is determined using Native Vegetation Council (NVC) scoresheets, which establish the required obligations. It is not the responsibility of the proponent to set or adjust these costs. Neoen considers that the offset proposed is ecologically significant and represents a higher cost–benefit ratio compared with contributing to the NV Fund. Furthermore, the SEB will be managed by experienced, accredited third-party providers. This approach increases the likelihood of achieving the ecological gains outlined, through targeted management and ongoing monitoring. In summary, while the site may not be perfectly suited to native grassland, the SEB delivers meaningful conservation outcomes within the offset framework, strengthens ecological connectivity, and is supported by professional management to maximise success.	No change to PD required	Not applicable
		Impacts to PBTL		[redacted] states he has concerns regarding impacts to PBTL (specifically in regards to urban, industrial and infrastructure development).	No specific concern or question raised. It is acknowledged that listed threatening processes to the PBTL, as outlined in the recent Conservation Advice for the species (DCCEEW 2023), describe the potential impact from urban, industrial and infrastructure development. Extensive targeted on-ground survey work has been undertaken to identify and avoid individuals and known 'hot spot' areas. The PD provides an extensive assessment regarding the current population of PBTL within the Project's Disturbance Footprint and estimates across the broader Project Area, and considered all viable potential direct and indirect impacts to PBTL arising from the Project. Residual impacts are proposed to be offset, in line with DCCEEW's offset policy, and as outlined in the PBTL Offset Management Plans (x2).	No change to PD required	Not applicable

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		Plains Wanderer		[redacted] states he has concerns regarding impacts to the Plains Wanderer (stating he doesn't agree with the assessment that the species is unlikely to be present in the highly disturbed/grazed grasslands).	Regarding Plains Wanderer (*Pedionomus torquas*), Neoen acknowledges that the Australian Government's PMST reports that the species or species' habitat may occur across the GWNF Project Area (WF and OTL). A likelihood of occurrence assessment for all MNES which could potentially occur within the Project Area was undertaken in Attachments 2 and 3 to the PD (in Appendix A of the Ecological Assessment Report and in Table 4.6, page 84 of the Significant Impact Assessment report). The likelihood assessment for the species was undertaken by taking into consideration whether potentially suitable habitat occurs within the GNWF, combined with a search of known BDBSA and/or ALA records (this included any and all known records, historical and recent, noting few BDBSA records exist for the species in South Australia at all, and thus relying upon potentially unverified ALA records), and that there have previously been a number of regional annecdotal sightings, however, these have not been confirmed by DEW or made publicly available. Neoen note that the Plains Wanderer may be considered a rare and elusive species (DotE 2015), however, despite extensive ecological surveys and search effort across a number of years and seasons both within the Project Area (sett Preliminary Doucmentation Table 2.2 and Table 3.1) and broader region, the species has not been identified within or near the GNWF Project Area (Umwelt 2025). Survey effort specific to the current GNWF Project Area includes eight seasonal Bird and Bat Utilisation Surveys, which were undertaken across the Project Area, in line with DCCEEW's DRAFT onshore windfarm guidance (DCCEEW, 2024). The Plains Wanderer was not identified during any of these surveys or considered to be likely to occur. As such, Plains Wanderer was not considered to be an at risk EPBC listed species. Umwelt acknowledges that surveys to date have not been targeted to this species (i.e. nocturnal transect surveys), and thus detection would be limited to flushing Plains Wanderer from suitable habitat during the course of other daytime surveys. While the conservation significance of this species is recognised, the available evidence does not indicate its continued occupation within the Mid-North region. In light of the very low likelihood of occurrence, and consistent with standard survey practice, targeted surveys were not undertaken. Resources were instead directed toward species with a higher probability of presence, ensuring that survey effort was proportionate and scientifically justified. Neoen has consulted with DEW and the Northern and Yorke Landscape Board (NYLB) and is aware of a study currently underway in Mokota Conservation Park to investigate the potential presence of Plains-wanderer using acoustic recording devices. At this stage, no results or further information from that study have been made available to provide additional justification for undertaking targeted surveys. The Plains Wanderer was not considered a controlling provision for the Project, and no additional information was requested regarding this species in the RFI received from DCCEEW. Despite recent interest in this species from State government, the risks to the species are considered very low, based on a low likelihood of occurrence.	No change to PD required	Not applicable
		Australian Bustard		[redacted] states he has concerns regarding impacts to the Australian Bustard (stating there are Bustard records in the general locality).	Regarding the Australian Bustard (*Ardeotis australis*) - this species is not listed under the EPBC Act and thus no response required (non-EPBC related matter).	No change to PD required	Not applicable
18/11/2025	PBTL Recovery Team	Successful and unsuccessful search areas for PBTL clearly defined	Comment is broadly supportive of the PBTL assessments and avoidance measures put forward. Comment is constructive surrounding MNES.	Recovery Team would like to see successful and unsuccessful search areas for PBTL documented, which are then applied to the immediate pre-development micro-siting surveys to learn about presence/absence patterns.	Figure 4.3 (page 104) indicates the searched areas for PBTL showing both successful and unsuccessful search areas. Additional data will become available from the pre-clearance micrositing surveys which are being undertaken for the current geotechnical investigations and for the broader wind farm construction. PCC surveys will include a GPS location of all searched holes regardless of their contents. PBTL will be marked separately and the GPS location of their capture and relocation site (if required) will also be recorded. Neoen and their ecological consultant will also consider the feasibility of collecting any specific additional data requested by the PBTL recovery team, in addition to the abovementioned methodlogy. Neoen are happy to share data with the PBTL recovery team when available to assist with better understanding presence/absence population patterns.	No change to PD required	Not applicable
		PBTL habitat fragmentation		Main issue relating PBTL is fragmentation, and it's their opinion that far more PBTL will be impacted. They would like to see longer term measures in place to reconnect areas post construction to help with connectivity. Suggest that measures are put in place during road construction to test if having corridors built across roads would help with connectivity. The team are unsure about impacts of construction on the stress to lizards and spiders.	Population fragmentation was considered during the assessment of PBTL as a low to moderate risk of division and isolation of PBTL sub-populations by construction of vehicular access tracks (as per Table 7.2 of the PD). Further, Table 7.10 of the PD summarised the significant impact assessment for PBTL and states "For the purposes of this assessment the typical road width is assumed to be nominally 11 m (variable across site) excluding site specific cut and fill requirements and temporary disturbance corridors either side. It is noted that PBTLs are understood to exhibit limited dispersal (Schofield et al. 2012), with males typically dispersing further than females, and females typically moving distances of less than 20 m from their burrows, and though relatively uncommon, some individuals have been recorded dispersing up to 200 m (Milne 1999; Smith et al. 2009 cited in DCCEEW 2023). Project areas such as WTG hardstand areas and new roads and tracks may hinder the movement of some PBTL within the population, however, the Project is unlikely to inhibit the movement of this species completely nor restrict gene flow or genetic exchange between individuals in the population. Additionally, it is noted that a number of existing roads and tracks already occur within the Project Area, and where practicable, these will be utilised by the Project." A recent unpublished thesis paper provided by the PBTL Recovery Team (Wallace, 2025), after development of the PD, provides data which indicates that while PBTL movement and therefore gene flow may be inhibited by bitumenised (sealed) roads, there was no evidence for restricted gene flow across an unsealed road. The access tracks around the GNWF are all unsealed roads/tracks, and Neoen has proposed a road design where rocky substrate deployed in road gutters to manage surface water flows and erosion is only required where sloes exceed 8 degrees, with remaining areas across much of the access road network proposed only 'grassed swales' as road gutters, which will readily enable PBTL crossing. Neoen has also committed to up to five 'engineered crossing points' specifically for PBTL as a trial measure. The 'Other Compensatory Measures' component of the PBTL offset for GNWF includes a research project which is focused on mitigation strategies for PBTL (differing from the impact assessment focus of the GS research). As noted above, Neoen have committed to trialling up to five 'engineered crossing' points for PBTL at key track locations post-construction of the WF (once heavy vehicle movements are completed). These trial 'engineered crossings' will enable the research program to conduct trials using population genetics methods to determine whether gene flow occurs across tracks. The PD, PBTL Offset MPs and PBTL MP have been updated to reflect these changes, and to include the research objectives regarding these crossing treatments.	Yes	Section 2.2.6 of the PD and Attachment 1 (Project Description) have been updated to provide more detailed information which is now available regarding access track design. Design updates reflect proposed 'grassy swale' gutters which are proposed across the majority of the access road network, except where slopes are greater than 8 degrees. Updates have been made to Attachment 13 of the PD (the PBTL Management Plan), in part in response to comments received on the draft versions of the MP, but also to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of the proposed on-ground offset properties. Table 1.3 in Section 1.5 of the PD has been updated to reflect the additional attachments. Attachment 03 of the PD (the SIA) has also been updated to include the above: - Section 4 and Table 4.6 (PBTL) (including additional mitigations) - Section 4 and Table 4.6 (FRWL) Also within the PD document: - Section 7.1.6 and Table 7.10 (PBTL) - Section 7.4.3 and Table 7.23 (FRWL) updated to incorporate the findings of the Wallace (2025) research thesis, and reference to the proposed 'other compensatory measures',
		Relocation of PBTL		Use of short distance relocation for PBTL is untested. Strategy used for Goyder South, but no follow-up assessments on the fate of the lizards which is a gap.	Salvage translocations or short distance responsible relocation of PBTL identified during pre-construction surveys is proposed as a mitigation measure for PBTL for the GNWF, and would be undertaken in accordance with state and Commonwealth regulatory requirements, including scientific research permits (state), and in accordance with EPBC Act Policy Statement Translocation of Listed Threatened Species (Department of Suistainability, Environment, Water, Population and Communities, 2013). Currently there are no guidelines for fauna translocations within South Australia. However, we re-iterate that the residual impacts to PBTL and subsequent offset requirements do not consider a reduction in impact as a result of this mitigation strategy. Until data is available to confirm the success (or otherwise) of the short distance relocation, it was considered that the conservative approach of not accounting for this mitigation was most appropriate. The proposed research component of the offset for PBTL is planned to focus on mitigation strategies (rather than impact assessments which are the focus of the Goyder South research) and assessing the success of relocations is part of the research objectives. The research objectives are outlined in the PBTL Offset Management Plans ([redacted] and [redacted] which are now attached to the PD. Section 9 of the PD has been updated to reflect the PBTL offset package in total.	Yes	Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline the Offset Proposal for PBTL, which includes a summary of the Other Comsensatory Measures component of the overall offset package which comprises a research component focused on better understanding translocation/relation success. Table 1.3 in Section 1.5 of the PD has been updated to reflect the additional attachments. Section 9 of the PD has also been revised and summarises the research objectives of the Other Compensatory Measures re translocation and relocation success, and how the other compensatory measures (and research plan) will fulfil the EPBC Offset Policy.
		Relocation of spiders		During construction, the Team would like to see spiders (specifically trapdoor) relocated, as they are main drivers of lizard presence, noting this is an untried field strategy.	No spider relocation is currently proposed within the PBTL Management Plan. Table 9.3 of the PBTL Management Plan does propose that during pre-construction surveys that any spiders identified in burrows within the Construction Footprint will be 'vacated' and then collapsed to force spiders to move away (without being killed). Discussions with [redacted] from the PBTL Recovery Team on 4 Dec 2025 indicate that the intent of this comment was that trials be undertaken, not that all spiders in the disturbance footprint be relocated. The PBTL MP notes that a total of 186 PBTL have been recorded from approximately 21,641 spider burrows during targeted PBTL surveys in GNWF. This equates to lizards occupying approximately 0.86% of spider burrows searched, incidating that spider burrows do not appear to be the limiting factor for PBTLs. Given that the search areas to date have focused primarily on the disturbance envelope, there are expected to be many thousands of additional holes in the broader Project Area and beyond. Preliminary studies on potential for spider translocation have indicated that trapdoor spiders may be able to re-dig their burrows if translocated with the top portion of their burrow, includng the lid or 'trapdoor'. However, these studies were undertaken in a controlled environment using a bucket of sand as the translocation substrate.These studies do not provide sufficient confidence of a positive result given the added challenges of translocation into a natural environement, includng variable soil type and risk of predation with short term occupation of shallow burrows. Thus, the investment by Neoen to undertake spider translocations / relocations as a mitigation strategy is not justified on a broad scale. Neoen confirm they are happy to work with Flinders University to facilitate involvement of researchers during the pre-clearance surveys, to enable the Flinders team to collect a sub-set of spiders/burrows from the disturbance footprint prior to disturbance, to enable that team to conduct the requested spider-relocation trials. This does not form part of the proposed scientific research related to the compensatory measures component of the GNWF PBTL EPBC Offset, and has been agreed with [redacted].	No	Not applicable

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		Cumulative effects		Cumulative effects need to be understood in the context of population size effects and fragmentation.	Cumulative impacts have been assessed in the Preliminary Documentation (Section 5.4), and specifically for PBTL in Section 5.4.1.3 where other EPBC referrals impacting PBTL have been reviewed. To our knowledge, survey effort at GNWF for PBTL has been more extensive than any other current or historical referral, and the habitat assessment applied is likely to be conservative compared to other applications. Neoen has committed to pre-clearance surveys and relocation of any PBTL detected within the Disturbance Footprint. While survivorship of relocated individuals has not yet been verified, some individuals are expected to survive, reducing the actual impact to PBTL in the Project Area and the overall PBTL population. Relocation as a mitigation measure will also be incorporated into a mitigation-focused research project as part of the GNWF EPBC Offset Package compensatory measures. Given the naturally restricted dispersal of PBTL, owing to their extremely limited home ranges and minimal movement between habitat patches, the cumulative effects of fragmentation are expected to be minor within the relatively short generational timeframe of the WF asset life (approximately 25–30 years). Roads are proposed to remain unsealed, and while tracks may contain rock rubble in gutters to manage surface water flows and erosion risk where required, Neoen commits to ensuring there are clear areas to facilitate easy crossings by fauna. New roads to be established will nominally be up to 11 m in width, excluding site-specific cut and fill requirements which are more extensive in steeper terrain and a temporary disturbance of 5 m on each side (e.g. a road section may have a maximum 21 m width during construction, and nominally 11 m width post-construction, though road widths vary extensively due to topography and civil design requirements - see the Disturbance Footprint spatial layer for proposed road widths). It is acknowledged that roads, particularly sealed roads, have the potential to create barriers to PBTL genetic flow, however, a recent study (Wallace 2025) found that while PBTL gene flow was negatively influenced by sealed roads (i.e. bitumenised), no restricted gene flow was identified across an unsealed (i.e. dirt) road. As the GNWF Project does not intend to seal any roads, the likelihood of a fragmentation impact caused by roads, may be reduced. It is also noted that only roads/tracks in areas which exceed 8 degrees in slope require uninterrupted sections of rocky rubble in the gutters to control surface water flows and erosion. Remaining roads across large portions of the access track network include only grassed 'swales' as gutters, with intermittent rock checks, which are included in the total road width and which will be readily crossable by small reptiles. The entire assessment, including the Preliminary Documentation and supporting studies, has been undertaken with regular consultation with DCCEEW. Offsets are proposed for residual impacts in accordance with the EPBC Act Offsets Policy and guidance, and these will be subject to approval by DCCEEW. The proposed offset package, described in Section 9 of the PD is considered proportionate to the impact as the DCCEEW Offset Assessment Guide (OAG; calculator) was used to calculate the offset requirements. Inputs into the OAG were guided by habitat quality assessment guidelines supplied by DCCEEW to determine the quality of habitat at the impact site and the proposed offset sites. The offset sites are to be delivered in connection with the GNWF, so although there may be some loss of individuals as a result of the GNWF, PBTL population gains are expected elsewhere, including at properties managed exclusively for conservation outcomes. The 'Other Compensatory Measures' component of the PBTL offset for GNWF includes a research project which is focused on mitigation strategies for PBTL (differing from the impact assessment focus of the GS research). Neoen has committed to trialling up to five 'engineered crossing' points for PBTL at key locations post-construction of the WF (once heavy vehicle movements are completed), which would enable the research program to conduct trials using population genetics methods to determine whether gene flow occurs across tracks.	No	Not applicable
		Indirect impacts of construction on lizards and spiders		Little is known on the effect of the construction phase on the lizards and spiders (both short and long term).	We acknowledge that the potential short-term impacts of construction activities on species such as the Pygmy Bluetongue Lizard (PBTL) and spiders are not fully understood, particularly in relation to noise and vibration. Other potential impacts during construction include dust or sediment deposition within spider and PBTL burrows. These impacts are discussed in more detail in the PD Section 5.1.2, 5.2.4 and 5.2.7 respectively. The construction phase is expected to last approximately 2–3 years, after which the wind farm will become operational. During construction, noise and vibration will primarily result from machinery, vehicle use, and intermittent blasting. Once operational, these factors will relate to the wind turbine generators. At this stage, the potential impacts of both phases remain uncertain. To address potential disturbance during construction, the Project has developed a PBTL Management Plan (PBTL MP) that includes specific controls to minimize impacts. These measures ensure that all reasonable and practicable noise mitigation strategies are implemented in accordance with the Construction Noise and Vibration Management Plan (a sub-plan of the CEMP). Key actions include regular servicing and maintenance of vehicles and machinery, and ensuring vehicles not in use are turned off to reduce unnecessary noise and vibration. Dust and sedimentation are considered short-term potential impacts during construction and are unlikely to cause long-term effects on PBTL with the implementation of dust management and erosion and sediment control measures (detailed in the Soil Erosion and Dust Management Plan; SEDMP). The PBTL MP requires adherence to the SEDMP, prompt rehabilitation of exposed or disturbed soil, and regular checks to ensure sediment controls remain effective. The impact of dust and sedimentaion during the operational phase is expected to be minimal, as traffic will be minimal and rehabilitation of temporary cleared areas will commence, therby reducing the area of exposed soil. On roads which may be more frequently trafficked, such as the main access road, the CEMP includes provisions for application of road surface binding solution, which effectively maitains the nature of the unsealed road, but prevents excessive dust. A preliminary study at GSWF (Umwelt 2025) observed trends in PBTL occurrence and habitat near infrastructure, indicating that in the short term, PBTL persist in the presence of construction activities and wind farm infrastructure. However, the lack of comparable pre-construction data limits the ability to draw definitive conclusions about the potential contributing factors to these patterns. This is discussed in the PD in Section 7.1.2.1.	No	Not applicable
19/11/2025	NYLB (Northern and Yorke Landscape Board)	PBTL habitat fragmentation	Comment is neutral regarding the project/Neoen, with constructive concerns raised relating to MNES.	For PBTL, the NYLB have concerns regarding construction impacts, fragmentation particularly due to service tracks. References M Gardener (LEGCS Lab Flinders University) research re a 100-year old sealed road and lack of PBTL gene flow. The NYLB note there has been no investigation of re-engineering or re-design of service tracks to allow movement of PBTL and FRWL. They would like to see conservative approach for population viability analysis for each patch of lizards potentially being fragmented into new populations. Unviable populations post-infrastructure added to cumulative impact of development assessed by DCCEEW.	Approximately 40 km of existing roads and access tracks have been directly utilised within the WF (and OTL), and 6.76% of the Disturbance Footprint (36.31 ha) occurs within existing cleared areas (such as existing roads). Although not all proposed access roads are able to exactly follow the small curves and contours of the existing minor roads, where possible, they follow the general alignment in order to intersect as much as possible and minimise fragmentation. Furthermore, the design has considered the location of existing major roads and infrastructure such as the GSWF OTL, to minimise disturbance required for access to the OTL. Utilising these existing roads for primary access, with only shorter side tracks required to access the OTL towers, has significantly reduced the overall footprint, by removing the need for an access track traversing the length of the OTL. The Disturbance Footprint for WTGs includes by necessity internal wind farm roads which will be required for WTG construction and operation for the life of the asset. Roads are proposed to remain unsealed, and while tracks may contain rock rubble in gutters to manage surface water flows and erosion risk where required, Neoen commit to ensuring there are clear areas to facilitate easy crossings by fauna. New roads to be established will nominally be up to 11 m in width, excluding site specific cut and fill requirements which are more extensive in steeper terrain and a temporary disturbance of 5 m on each side (e.g. a road section may have a maximum 21 m width during construction, and nominally 11 m width post-construction, though road widths vary extensively due to topography and civil design requirements - see the Disturbance Footprint spatial layer for proposed road widths). It is acknowledged that roads, particularly sealed roads, have the potential to create barriers to PBTL genetic flow, however, a recent study (Wallace 2025) found that while PBTL gene flow was negatively influenced by sealed roads (i.e. bitumenised), no restricted gene flow was identified across an unsealed (i.e. dirt) road. As the GNWF Project does not intend to seal any roads, the likelihood of a fragmentation impact caused by roads, may be reduced. It is also noted that only roads/tracks in areas which exceed 8 degrees in slope require uninterrupted sections of rocky rubble in the gutters to control surface water flows and erosion. Remaining roads across large portions of the access track network include only grassed 'swales' as gutters, with intermittent rock checks, which are included in the total road width (nominally 11 m but typically more in steeper terrain where cut and fill requirements are more onerous) and which will be readily crossable by small reptiles. The 'Other Compensatory Measures' component of the PBTL offset for GNWF includes a research project which is focused on mitigation strategies for PBTL (differing from the impact assessment focus of the GS research). Neoen have committed to trialling up to five 'engineered crossing' points for PBTL at key locations post-construction of the WF (once heavy vehicle movements are completed), which would enable the research program to conduct trials using population genetics methods to determine whether gene flow occurs across tracks. The PD and supporting documents have assessed the risk of fragmentation into sub-populations of PBTL within the WF as low to moderate due to construction of vehicular access. PBTL are naturally sedentary with small home ranges, rarely dispersing more than 20 m from their burrow, and with evidence of high levels of genetic structure on a fine scale (<400m) (Smith et al 2009). A large portion of the access tracks within the WF lead to WTG and are 'dead end track' meaning that over time (multiple generations) we would still expect genetic flow across the WF (predominantly facilitated by males / male biased movement) despite additional tracks. i.e. gene flow on either side of access tracks would eventually meet beyond the end of the 'dead end tracks' even in the unlikely event that no lizards ever crossed the tracks. Possible decomissioning of the WF after 25-30 years would include rehabilitation of the access tracks, therefore, if the roads do present a barrier to movement, gene flow would be restored after decomissioning. A population may be considered unviable when demographic trends (low recruitment, skewed age structure), genetic indicators (loss of heterozygosity, high inbreeding), and ecological constraints (fragmentation, insufficient habitat) collectively suggest that long-term persistence is unlikely. These factors are typically assessed through population viability analysis, which provides a quantitative estimate of extinction risk over relevant timescales. PBTL are a naturally pilopatric species, with low levels of dispersal and gene flow, meaning restricted gene flow within any fragmentated population may take longer to adversely effect the sub-population, and relevant timescales for extinction risk may exceed the life of the project (25-30 years). Additionally, while gene flow may be restricted, it is not expected to be completely stopped, with occassional crossings over access tracks enabling a degree of cross over of genetic material.	Yes	Added information regarding the Wallace (2025) research thesis has now been added to Attachment 03 (the SIA), specifically: - Section 4 and Table 4.6 (PBTL) (including additional mitigations) - Section 4 and Table 4.6 (FRWL) This information has also been summarised in the PD (Section 4.1.2.1 and Section 7.1), specifically: - Section 7.1 Table 7.2; Section 7.1.3 Table 7.9; Section 7.1.6 and Table 7.10; (for PBTL) - Section 7.4.3 and Table 7.23 (for FRWL) Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program. Section 2.2.6 of the PD and Attachment 1 (Project Description) have been updated to provide more detailed information which is now available regarding access track design. Design updates reflect proposed 'grassy swale' gutters which are proposed across the majority of the access road network, except where slopes are greater than 8 degrees.
		INTG Impacts INTG rehabilitation INTG fragmentation		For INTG TEC clearance, concerned with 6.14 ha of Class B INTG TEC, TEC already under pressure with warming and drying of the Mid North (climate change), concerns re lack of clear pathway to re-establish the community, issue of particular weeds such as Horehound and Cutleaf mignorette. NYLB do not believe fragmentation impacts have been adequately addressed.	We acknowledge the concern regarding the clearance of 6.14 ha of Class B INTG TEC, particularly given the pressures already faced by this community due to warming and drying trends in the Mid North region. The risk of ongoing and future climatic change has been explicitly considered in the INTG EPBC Offset approach. The offset approach for INTG is designed to avoid reliance on a single location by distributing offsets across multiple properties situated in different climatic portions of the Mid North. This approach aims to enhance resilience in more northerly properties, such as the SEB Offset at 92 Civilization Gate Road, through targeted management, while also mitigating risk by securing properties in higher rainfall areas to the south and west of Goyder's Line (e.g., [redacted] and [redacted]). While it is recognised that these areas will also be subject to climate change, property acquisition is constrained by market availability and the need to balance ecological outcomes with proximity to the project area, ensuring that local populations are appropriately compensated. With respect to re-establishing the community, Neoen acknowledges the purported difficulty and limitations in rehabilitating or restoring areas of INTG, which is why areas proposed for temporary clearance (3.72 ha) are being compensated for, in full, by the INTG EPBC Offset and Native Vegetation Clearance Application (total of 6.14 ha comprising 2.43 ha of permanent and 3.72 ha of temporary clearance of Class B INTG). Neoen has incorporated a rehabilitation plan as part of the INTG Management Plan (INTG MP), for areas of temporary impact, which will be in addition to the Offsets secured for the Project. Although there is a risk that rehabilitation may not achieve the desired objective, to return the temporarily cleared areas to their former state, a targeted monitoring program will be used to inform the trajectory of this rehabilitation and proposes triggers to implement additional management, such as revegetation or grazing management. These adaptive management actions will be further supplemented by the best practice knowledge at the time, through ongoing consultation with relevant experts. Regarding weeds, the Construction Environmental Management Plan (CEMP) and INTG MP include a comprehensive weed management and monitoring program, regarding both the broader Project Area, and specifically, the areas of temporary INTG clearance proposed for rehabilitation. This involves a baseline survey of the Disturbance Footprint, followed by regular (three-monthly) on-ground audits (internal) of cleared areas within INTG to identify and map weed presence, incursions and extent compared to the baseline, and to inform control measures. This ensures that outbreaks are detected early and treated appropriately. All Declared weeds, including Horehound and Cutleaf Mignonette have previously been identified as priority concerns, and will be prioritised for control. Fragmentation impacts are addressed in subsequent comments and responses.	No change to PD required	Not applicable
19/11/2025	[redacted]	INTG impacts (Stage 3) PBTL impacts	Comment is anti-project, however constructive concerns are raised around MNES.	Part 1- PBTL will be affected by reducing INTG. Stage 3 should be considered at the same time as vegetation communities including 60% Lomandra grasslands (her estimate from maps) disturbances are similar. This is an extremely rare ecosystem threatened by clearing, grazing, weed invasion and fragmentation.	Stage 3 impacts are not considered in the PD or supporting documents as the Stage 3 project is not proposed, was not referred, or being assessed here. There is no current plan by Neoen to develop further stages of the GNREF. If any further stages were to be progressed in the future, they would be subject to a full EPBC referral and assessment and stakeholder engagement.	No change to PD required	Not applicable

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		Conservation areas, Tiliqua Nature Reserve, Mokota Conservation Park, HA 1264 (Mongolurring Nature Reserve), Mimbara Conservation Park		Part 2 - Additionally, PBTL co-exist with INTG in addition to the other listed nationally and state species. The impact in the development envelope will have flow-on effects on conservation areas including HA1264 (Mongolurring), Mimbara Conservation Park. Known threats from proposal will continue into Stage 3.	Direct and indirect impacts to all MNES potentially present within the Project Area have been considered within the PD and supporting documents. Where residual impacts are expected, offsets are proposed to compensate for those impacts, with draft INTG and PBTL Offset MPs now with DCCEEW for review. State listed species are not considered in the PD or supporting documents, as they are not the protected under the EPBC Act and therefore not the subject of this documentation. Conservation reserves are considered in the PD, in particular in relation to potential indirect impacts as a result of shadow flicker which extends beyond the disturbance footprint for WTGs. Table 7.8 on page 346 of the PD provides the area and duration (per year) of shadow flicker expected within conservation reserves. Neoen engaged with NFSA and PBTL Recovery Team regarding WTG set-backs from Tiliqua Nature Reserve and potential impacts to PBTL, with 500 m set-backs agreed (Table 7.9, page 353 of PD). Neoen have committed to 450 m set backs from Mokota CP (noting the closest WTG to Mokota CP has been set back to 470 m), and set backs are ~480 m from the boundary of HA 1264 (Mongolurring Nature Reserve). Stage 3 impacts are not considered in the PD or supporting documents as the Stage 3 project is not proposed or being assessed here. There is no current plan by Neoen to develop further stages of the GNREF. If any further stages were to be progressed in the future, they would be subject to a full EPBC referral and assessment and stakeholder engagement.	No change to PD required	Not applicable
		On-ground SEB offset		Part 3 - On-ground SEB protects almost no Lomandra grassland and the remaining vegetation types suggest a different soil type not suitable for INTG. As such, it's not a like for like substitution.	Neoen acknowledge the concern that the on-ground SEB area is perceived to protect little Lomandra grassland and that the remaining vegetation types may not be suitable for INTG, raising questions about whether the offset represents a like-for-like substitution. The SEB Area at 92 Civilization Gate Road, in fact protects approximately 44 ha of Lomandra Grassland that meets the description outlined in the Conservation Advice. This mapping is considered conservative, as Lomandra species also forms a dominant component of several other vegetation associations mapped across the property that have likely been historically modified by agricultural land use. Lomandra species, including *L. effusa* and *L. multiflora* , occur as understory components within VA1 *Callitris / E. porosa / E. leucoxylon* Woodlands, VA4 *Bursaria spinosa* Shrubland, and VA5 *Maireana aphylla* Shrubland. Further, mapping undertaken by the Northern and Yorke / Murraylands Landscape Boards (2018 and 2020 surveys) identifies more extensive areas of INTG, including Class A, within the Heritage Agreement (HA1551) located centrally to the SEB Area, as well as extensive areas adjoining land to the southeast. This evidence supports the suitability of the property for INTG. Likely influenced by the above, NV clearance approval has been granted by the NV Council for the GNWF, including the Stage 1 SEB offset at 92 Civilisation Gate Road. In addition to the above, a separate EPBC Offset package is proposed for the Project, which includes an INTG-specific offset at [redacted] (documented in the INTG Offset Management Plan, [redacted] which was not acailable at the time of public comments). This property, located in a more temperate climate, south west of Goyders Line, adjoining mapped INTG at GNWF (northern GNREF section), contains significant areas of Lomandra Grassland, including Class B and Class C INTG. Taken together, the overall offset package for GNWF will secure and manage a minimum of 132 ha of INTG for conservation in perpetuity. This represents 15-times the clearance of 8.59 ha of Lomandra grassland associated with the Project, ensuring that the offsets provide meaningful ecological gain and long-term protection. In summary, while concerns about soil type and vegetation suitability are noted, the SEB Area demonstrably supports Lomandra Grassland and INTG, and the broader offset package ensures a substantial and enduring conservation outcome.	Yes	Substantial updates to Section 9 of the PD have been made, updating from a high level Offset Strategy to a more detailed Offset Proposal. Details regarding EPBC related INTG offsets have been updated within Section 9.5 of the PD. Draft INTG Offset Management Plan is now available as Attachment 21 of the PD which outline details for each of proposed on-ground offset property for INTG (document was not previously available). Table 1.3 in Section 1.5 of the PD has been updated to reflect the additional attachment. No changes made regarding SEB component of the offset, as this is not the focus of the PD.
		NV Act approval		Summary -The report lists its own proposed activities as Seriously at Variance with the principles of the NV Act and NC Regulations. Table 4.34 Remnancy Figures uses an inappropriate scale for recording the locations of INTG patches. Damage to 546.6ha cannot be considered Incidental clearing. Table 4.2 outlines disturbance (temp and permanent) yet no previously successful rehabilitation projects are listed and the technology required is undeveloped. It is estimated that good restoration will cost over $60m, a SEB payment of $8,586,127 is grossly inadequate.	The NV Act and Regulations are not the subject of the EPBC focused PD or supporting documents, and so are not addressed within. The tables which are referred to are from the Native Vegetation Clearance Data Report (February 2025) (pages 37 and 115) which was not part of the EPBC Preliminary Documentation package of documents which were available for public comment. However, we note that NV clearance approval has been grated by the NV Council, and an on-ground SEB has been proposed and approved (for Stage 1) by the NV Council, rather than the SEB payment of $8,586,127. It is unclear where the estimate of $60m comes from for restoration, and over what area this covers. We are unsure where the reference to 'Incidental clearing' comes from. It is not in the PD or associated documents. We assume the comment is also in regards to the Native Vegetation Data Report (which is not an attachment to the PD, or part of the EPBC assessment process). The word 'incidental' is used in the Native Vegetation Regulations which states " Clearance is sought under Regulation 12, Schedule 1; Clase 34 – Infrastructure, which allows: 1. Clearance of vegetation – a. **Incidental** to the construction or expansion of a building or infrastructure where the Minister has, by instrument in writing, declared that the Minister is satisfied that the clearance is in the public interest; or... Given the uncertainty around whether INTG can be successfully rehabilitated back to a condition which represents the TEC (i.e. Class A or B), the full areas of temporary disturbance of INTG are considered to be permanantly impacts for the sake of the residual impacts and offset calculations. An INTG Offset MP (draft) is now available for DCCEEW review, to offset the residual impacts to INTG.	No change to PD required	Not applicable
19/11/2025	[redacted]	Visual impacts to Burra and National Heritage Township. Burra World Heritage bid. Community consultation regarding visual impacts.	Comment is generally supportive of the project, however constructive concerns raised about visual impacts.	[redacted] view is visual integrity of Burra will be forever changed by the visibility of turbines thus demising the view and character of the State and National heritage township. It is possible that Burra's World Heritage bid could be challenged if the GNWF goes ahead without modification to tower array in southwest corner (area closest to Burra). [redacted] disagrees with GBD visual effect grading matrix as the turbines would present a highly negative visual impact. She supports removal of more turbines so there is no visual impact, specifically turbines 001, 002, 003, 004, 005, 006, 013, 014, 015, 016, 017, 020. There has not been sufficient community consultation on the matter of visual impact, and little direct effort to engage with Burra property owners, businesses and associations (noting the consultation effort in October 2023). She recommends establishing formal community engagement process with clear and transparent communication, including public meetings with models of the development site and visual impact on Burra.	The visual impacts of the GNWF on the National Heritage listed Australian Cornish Mining Sites (Burra township) were considered in the EPBC referral for the GNWF, and were also were assessed through the State Development Application process. The referral was supported by visual modelling and assessment undertaken by Biosis (2024) which concluded that the National Heritage Listed township of Burra was approximately 2.7km from the Goyder Renewable Energy Facility at it's closest point. Views from the township of Burra are not cited in the National Heritage criteria, or the State Heritage statement of significance. and the Goyder North Project was determined to not have a significant impact on the Nationally-Listed Heritate site, as defined by the Significant Impact Guidelines 1.2. The Heritage Listed site was not included as a controlling provision in the 'controlled action' decision from the referral, and further assessment of the Heritage -Listed site was not requested in the Request for Information for the Preliminary Documentation. With regards to Burra's future World Heritage bid, the Preliminary Documentation did not consider this future possibility (which may or may not eventuate), as the township has not yet been listed, and is therefore not protected as a World Heritage MNES. This would be akin to fully assessing currently common species in the event that they were listed as nationally threatened in the future. Removal of 12 WTG at this stage of project development would have significant implications to the wind generation potential of the project, on the established power-purchase agreement, on all of the impact assessment work and ecological studies undertaken to date, and on the approved (SEB) and planned environmental offsets, and is not considered realistic. Visual amenity itself is not a MNES, and is not covered through the referral and EPBC assessment process. Neoen have conducted extensive on-going community engagement on a range of issues throughout the development of the GNWF Project, with ongoing Neoen staff presence at the Neoen office within the Burra township, and will continue to engage with the community.	No change to PD required.	Not Applicable
19/11/2025	[redacted]	Impacts to PBTL, INTG and SHNW. Community consultation regarding the sacred sites. Visual impacts to Burra and National Heritage Township. Burra World Heritage bid. Community consultation regarding the GNWF	Comment is anti-project and anti-Neoen.	Concern that the grassland, PBLT and SHNW will be further impacted by the project. Burra's local environmental experts need to be consulted on these matters and their knowledge and experience respected. Concern that there has been little consultation regarding the Ngadjuri sacred sites and storylines that weave through the region. Consultation needs to be conducted with Ngadjuri people. Knowledge of sites can potentially be destroyed including those that have already been allegedly destroyed during the Goyder South WF development. Burra is on tentative list for UNESCO World Heritage status. Already State and National Heritage listed. Concern that the WF will destroy visual integrity of Burra. Turbines provide visual pollution in the township. [redacted] has previously been promised by Neoen representative that turbines for the Goyder South would not be visible from the centre of Burra, but this is a false promise. Now Neoen has informed turbines only visible from elevated sites around township. Burra community has never been offered a Town Hall community meeting to discuss development (South or North), instead short hours of consultation offered in Burra's Neoen office. Neoen community fund offered giving out small grants is not an ideal way to support community.	Neoen acknowledges the residual impacts to INTG and PBTL arising from the GNWF Project, and has undertaken a thorough program of ecological surveys and assessments to fully understand the extent of the impacts, and to enable design modification to reduce impacts as far as practicable. Neoen have been fully transparent with both state and commonwealth agencies throughout this process, and have recently received approval for the Project under the Native Vegetation Act. Substanital effort has been made to engage with PBTL recovery team and landscape boards regarding the residual impacts, and in relation to proposed offsets for the residual impacts to these MNES. Draft PBTL and INTG Management Plans and Offset Plans are now available for these MNES, for consideration by DCCEEW. Proposed offsets follow the DCCEEW Offset Policies and are in-line with the required offseting process under the EPBC Act for unavoidable impacts to MNES. SHNW is not a MNES and was therefore not considered specifically in the GNWF referral, and was not requested to be addressed in the RFI for the Preliminary Documentation. Neoen acknowledges the presence of SHNW within the GNWF Project Area, with known occurences mapped within an Ecological Assessment Report (Umwelt 2025), which identified at least 35 active SHNW locations. Neoen commits to minimising impacts on this native species, and has addressed potential management of SHNW within the CEMP. This includes developing a specific Southern Hairy-nosed Wombat Management Plan for the Project using best practice methods to first avoid and then minimise impacts to SHNW. This will inlcude identification of active SHNW warrens during Pre-clearance Check surveys, and ongoing identification of active areas throughout construction; micrositing of infrastructure around identified locations if possible; and relocation of SHNW if required using best practice methods as guided by relevant experts. Neoen has met with local environmental experts and received feedback on the implementation of the Wombat Management Plan for Goyder South Windfarm. Learnings from this discussion will be incorporated into the SHNW MP for GNWF, including, but not limited to, development and review of the MP by subject matter experts. Cultural heritage and sacred sites are not MNES and were therefore not considered in the GNWF referral, nor were they requested to be addressed in the RFI for the Preliminary Documentation. Neoen notes that cultural heritage matters are sensitive and are being addressed through in-depth consultation with the Ngadjuri Nation Aboriginal Corporation (NNAC) and the Mid-Murray and Mallee Aboriginal Council (MMAC), as well as an ongoing approvals process with the South Australian Government, which includes its own consultation processes carried out directly with Traditional Owners. The visual impacts of the GNWF on the National Heritage-listed Australian Cornish Mining Sites (Burra township) were considered in the EPBC referral and further assessed through the State Development Application process. The referral was supported by visual modelling and assessment undertaken by Green Bean Design (2024), with a specific heritage assessment by Biosis (2024) overlaying the existing visual assessment. The Heritage Impact Assessment notes that the National Heritage-listed township of Burra is approximately 2.7 km from the GNREF at its closest point and concludes that the Goyder North Project would not have a significant impact on the nationally listed heritage site, as defined by the Significant Impact Guidelines 1.2. The heritage-listed site was not included as a controlling provision in the 'controlled action' decision from the referral, and no further assessment of the heritage-listed site was requested in the RFI for the Preliminary Documentation.	No change to PD required.	Not Applicable

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					With regard to Burra's prospective World Heritage bid, Neoen recognised early in project development Council's aspiration to elevate Burra on the world stage. In response, Neoen engaged extensively with key stakeholders during the Development Application consultation phase to minimise any potential effect of the GNREF on a future bid. These stakeholders included: •The Regional Council of Goyder; •Barry Gamble, World Heritage consultant to Council and member of ICOMOS - one of the three formal advisory bodies to the World Heritage are Committee; •Swanbury-Penglase, authors of the Burra & Moonta Conservation Management Plan; and •Biosis, Neoen's heritage consultant. The site layout was collaboratively reviewed with particular attention to turbines in the southwest of the project area, given their proximity to Burra and the Cornish Mining Site. Following multiple design iterations, eight turbines were removed from the initial layout over approximately 12 months of engagement. Ultimately, both specialists and key stakeholders agreed that the resulting configuration would not adversely affect the World Heritage bid, nor would it constitute a significant impact on the currently nationally listed site. Neoen also notes that visual amenity in itself is not a MNES, but was a key consideration for the State Commission Assessment Panel as part of the Development Application. Throughout this process, and continuing across the project's development, Neoen has undertaken extensive community engagement on a wide range of issues, with visual amenity being a common theme. Multiple community days have been hosted over the past three years, and Neoen's Burra office is open 2–3 days per week for anyone wishing to raise concerns or seek information. Community members also had the opportunity to provide comment on the State Development Application, and Neoen responded to all concerns raised during that formal consultation process. Neoen has taken a comprehensive, collaborative, and transparent approach to cultural heritage, visual amenity, and heritage-related considerations to ensure the project proceeds responsibly and with strong regard for community and stakeholder values.		
19/11/2025	[redacted]	Mitigation hierarchy	Comment is anti-project due to locality and interaction with MNES.	Supporting citations - fragmentation theory (Fahrig 2003, Haila 2002), metapopulation theory (Hanski 1998), and landscape ecology (Turner 1989). Neoen should apply avoidance of clearing native habitats, prioritise corridors and other connecting habitat, and identify important microhabitats. Largest portion of Project Area Disturbance Footprint - almost 85% (Table 1.5) is occupied by native vegetation, 40% of which is temporarily disturbed. Little effort made to use siting to reduce impacts.	The comment states that avoidance should of habitat should be applied, and siting to reduce impacts, implying that the mitigation hierarchy has not been used. The mitigation hierarchy has been applied throughout the planning and development phase of the GNWF, with iterative design and approvals documents. Further micrositing prior to construction is planned to further alleviate impacts to key MNES. Section 6 of the PD (pages 291 - 322 , i.e. over 30 pages) outlines in detail the measures to avoid, minimise and then mitigate impacts, and includes data regarding the amount of reductions to native vegetation clearance which have been achieved since the earlier referral (e.g. from 595.78 ha in the October 2024 referred design to the current 453.87 ha - see page 302 of the PD). Design modifications have focused on reducing impacts to the most important habitats, such as PBTL habitat or INTG TEC (or potential TEC (Class C INTG). Reductions in disturbance area are highlighted on Figure 6.2 (maps 1 to 3, pages 304-306 of PD). Application of the mitigation hierarchy is one of the key principals of the Native Vegetation Act 1991, and approval for the clearance has been granted by the Native Vegetation Council, indicating their satisfaction that the heirarchy has been applied.	No change to PD required.	Not applicable
		Site rehabilitation		Rehab via speard of topsoil is more likely to encourage invasive species than to restore disturbed plant communities.	Management measures, including rehabilitation of areas which are temporarily disturbed, are outlined in the CEMP (including risk assessments), as well as the INTG MP specifically of areas of INTG temporary disturbance. Respreading topsoil is an industry wide best practice which is commonly applied to disturbance areas after construction, as a first measure in allowing areas to naturally rehabilitate following disturbance. If this measure was not included, it would almost certainly be noted as absent during reviews by environmental agencies.	No change to PD required.	Not applicable
		PBTL impacts		Over 368ha of known and likely PBTL habitat stands to be directly impacted, affecting over 200 lizards, possibly as many as 274. Neoen makes no attempt to outline the consequences direct impacts may have on lizards, whether it will entail loss of body condition, reduced fecundity, or increased mortality rates. Ballpark estimates should be given so impact of the proposal is better assessed. Indirect impacts are listed but not quantified (Table 4.2). These include damage and destruction of PBTL habitat with associated mortality implying the disturbance footprint is an understatement of the actual disturbance footprint. Does not understand why loss of PBTL habitat and PBTL mortality due to clearing or being run over by vehicles as indirect impacts, identical events a few metres away would be classified as direct. Area of likely and known PBTL habitat in disturbance footprint is double the area of unlikely/unsuitable habitat, how is this consistent with Neoen's stated objective of minimising habitat impacts?	The entire Disturbance Footprint is included within the offset proposal, ensuring that residual impacts are fully accounted for. In addition, PBTL identified within the Disturbance Footprint during pre-clearance surveys will be relocated or translocated, as outlined in the PBTL Management Plan. This mitigation measure is implemented alongside the offsets, recognising the uncertainty in relocation outcomes and ensuring that multiple layers of mitigation are in place. Understanding the consequences of relocation and translocation on PBTL—including potential effects on body condition, fecundity, and mortality—is a key research objective within the "other compensatory measures" component of the offset. Research studies are proposed to be undertaken by Flinders University to specifically address these questions as part of the GN Project offsets. It is therefore not accurate to suggest that Neoen has made no attempt to outline or understand the consequences of direct impacts. Population estimates used in the assessment are conservative and have been reviewed and agreed upon with the PBTL Recovery Team, ensuring that the scale of impact is appropriately considered, with suitable methodlogy and assumptions utilised to survey and obtain estimates. With respect to vehicle strike, this is classified as an indirect impact because it arises from increased traffic associated with the project, rather than from the clearance footprint itself. While classification could be debated, both direct and indirect impacts are considered in the overall assessment, and the residual impacts from the entire Disturbance Footprint are incorporated into the offset proposal. Further, as the project design has concentrated alignment of roads with existing roads and tracks, this indirect impact is considered to already present a risk in these areas. Neoen recognises that the roads proposed are wider, and likely to be trafficked more heavily than farm tracks, especially during construction. However, upon comissioning of the WF and transition into operational activities, access tracks will be seldom utilised except for maintenance, monitoring and business as usual access by landholders. Therefore this indirect risk is considered a short-term increase in the existing level of risk to PBTL caused by road traffic. The mitigation hierarchy has been followed throughout, as evidenced by approval from the Native Vegetation Council. The presence of large areas of PBTL habitat within the Disturbance Footprint reflects the species' broad utilisation of grassland habitats in the region, rather than a failure to minimise impacts. In summary, the project offsets the entire Disturbance Footprint, incorporates relocation and translocation measures, supports targeted research into ecological consequences, and applies the mitigation hierarchy to ensure that impacts are responsibly managed and compensated.	No change to PD required.	Not applicable
		Metapopulation impacts - PBTL		Metapopulation theory (summarised in public comment) should be a guide for assessing effects of disturbance, where disturbance in one patch has knock-on effects on other patches. Source population is crucial to long-term survival of surrouding sink populations. INTG exists within the Project Ara amongst PBTL populations. Proposals are assessed piecemeal, ignoring the impacts to INTG and PBTL over the last 20 years, and without considering potential impacts of other project applications. Additional stages (all Goyder North) should be considered when assessing the current proposal. Aside from monitoring, what is contingency plan if things go awry? The area contains some of the largest PBTL populations (source population), and the proposal will directly affect large numbers of PBTL and indirectly affect more.	Regarding meta-polulation structures, Neoen assume the comment is referring to PBTLs. Without a thorough assessment of PBTL distributions and abundance across their broader Extend of Occurence (or at least regionally around the Project Area), we are unable to tell whether the lizards identified within the GNWF Project Area represent a 'source population' or a 'sink populations' (or both). Unfortunately, this data is not available, with more focused survey effort only available from other project development sites, specific study areas, or conservation reserves. PBTL are a naturally philopatric species characterised by low levels of dispersal, which presumably means that any meta-population structure which exists would require sub-populations within close proximity. Whilst our assessment is unable to determine whether the PBTL present within the Project Area form part of, or represent, a source population, our assessment does consider the potential impacts of habitat and population fragmentation on PBTLs. We note the overall assessment considered fragmentation as a low-moderate risk, on the basis that recent studies have identified no evidence of gene low restriction across unsealed roads (which are proposed for GNWF) and that even occassional track crossings will enable some transfer of genetic material into inherently genetically-viscous sub-populations. Trial engineered crossing points and research studies to assess their effectiveness are proposed as part of the offset plan. Cumulative impacts are addressed in Section 5.4 of the PD, which reviews all other projects which have been referred under the EPBC Act within a 50km radius of the Project Area as well as those which intersect with the PBTL Extent of Occurence. Any projects with possible impacts to MNES should have been referred, and this approach is therefore expected to capture impacts from other projects with potential or real impacts to INTG and PBTL. Stage 3 impacts are not considered in the PD or supporting documents as the Stage 3 project is not proposed, was not referred, and is not being assessed here. There is no current plan by Neoen to develop further stages of the GNREF. If any further stages were to be progressed in the future, they would be subject to a full EPBC referral and assessment and stakeholder engagement. Neoen note that we carry forward a contingeny option for PBTL offsets at the 92 Civilisation Gate Road SEB offset property, which is over and above the EPBC offset requirements which are met by the [redacted] and [redacted] EPBC offset properties with the Other Compensatory Measures proportion incorporated, described in the PBTL Offset Management Plans, [redacted] and [redacted]. Large numbers of PBTL have been identified, and/or are estimated at the GNWF largely as a result of the intensive survey effort conducted within this area compared with surrounding areas within the species Extent of Occurancy. Residual impacts to the species are offset, in accordance with the DCCEEW Offset Policy and procedures.	Yes	Added information regarding Wallace (2025) research thesis to Attachment 03 of the PD (the Significant Impact Assessment). Specifically: - Section 4 and Table 4.6 (PBTL) (including additional mitigations) - Section 4 and Table 4.6 (FRWL) Updates have also been made to Section 4.1 and Section 7.1 of the PD, specifically: - Section 4.1.2.1, Section 7.1 Table 7.2; Section 7.1.3 Table 7.9; Section 7.1.6 and Table 7.10; (for PBTL) - Section 7.4.3 and Table 7.23 (for FRWL)
		Tourism		Heysen trail and Mawson Trail tourism draw cards both routed to minimise exposure to built up areas. Will proposed development affect trail access? Will trails need to be re-routed during construction? To what extent will trail experience be degraded by presence of infrastructure? No reference in document	The Heyson and Mawson Trails are not MNES, and as such were not considered in the Projects referral or the RFI from DCCEEW for the Preliminary Documentation. Both trails will be impacted by the Project during construction, and were show on the figures in the Development Application. Neoen have engaged with Hugh Greenhill (the manager for these sections of the Heyson trail) early in the project development, and again in November of 2025 to discuss options for re-routing some sections of the trail during construction. Neoen are planning a similar process with DEW regarding the Mawson Trail prior to construction.	No change to PD required.	Not applicable

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19/11/2025	MRLB (Murraylands and Riverland Landscape Board)	INTG impacts	Comment is neutral, with constructive concerns regarding MNES.	Avoiding impacts for INTG TEC should be first principle when developing in this habitat. Large patches of footprint are in INTG TEC (Class A, B & C). Remnant patches are pivotal to the survival of this habitat, it is not possible to successfully offset the habitat. Any loss reduces the total extent remaining. Spring 2024 survey updated understanding, reclassified Class C to B. Prelim Doc, mitigated impacts to INTG from 29.64 ha to 12.43, with a further 2 ha possible. First requirement of mitigation hierarchy is avoidance of impact. This is an opportunity. Attachment 1 details comments on potential micro siting and track re-routing which could further reduce impacts on Class B and C (refer to this attachment for full list of details upon response).	Avoiding INTG has been a 'first principle' throughout the development of this project. A summary of the mitigation hierarchy elelements considered for INTG and the associated reduction in impacts to INTG is presented in Section 7.15.2, Table 7.59 of the PD. Key elements of Neoen's application of the mitigation hierarchy for INTG include: - inital site selection - extensive vegetation surveys to better characterise the extent of INTG to facilitate avoidance - alignment of project disturbance footprint with existing disturbance whereever feasible - design and construction to include non-conventional stringing methods to reduce temporary disturbance footprint during construction of OTL - rehabilitation of temporarily disturbed areas, and associated monitoring - offsetting of impacts to INTG, including for temporary disturbance, given the uncertainty with the success of rehabitation of the TEC. Neoen note that the Project has now received Native Vegetation Act 1991 clearance approval by the Native Vegetation Council, indicating that they are satisfied that the mitigation hierarchy has been applied. Regarding impacts to 12.43 ha of INTG, the comment received has incorrectly referenced the initial referral rather than the disturbance area presented in the PD where further reductions have already been achieved (aligning with the commenter's suggestion). Section 7.15.1 of the PD outlines the residual impacts to INTG, noting a total of 6.14 ha of impact (including both temporary and permanant disturbance) to INTG TEC, with an additional 2.44 ha of impacts to Class C INTG. Additional details are provided in the response to [redacted] above.	No change to PD required	Not applicable
		INTG impacts		Cumulative impacts does not address the condition or loss of the INTG in the broader context of loss across the state. Section could consider relative value of habitat in the landscape, what its loss will mean for species and communities it supports. Indirect impacts (stock movement, changes to grazing patterns) can lead to deterioration. Feedback from farmers is that weed incursions around WF are an issue, new weeds appear post construction that have never been present before. For INTG habitat, there is no demonstrated method to successfully rehabilitate it, hence temporary clearance (assumed to be rehabilitated) will not actually occur. It should be considered permanent clearance under the NV Act in terms of impacts and offsetting requirements. Area can be rehabilitated but it will not be INTG that replaces it.	Currently the EPBC Act does not account for or provide provisions or guidance for cumulative impact assessments for MNES (this is a flaw in the legislation that has been identified in both the Samuel Review (2020) and the Wentworth Group of Concerned Scientists (2023)). However, a robust cumulative impact assessment has been undertaken for all MNES identified in DCCEEW's RFI (dated 5 December 2024), including INTG TEC. Whilst there is no formal guidance for how to undertake cumulative impact assessments under the EPBC Act, the cumulative impact assessment provided in Section 5.4 of the PD has taken into consideration all potential and known impacts to those MNES which are potentially relevant to the GNWF and up to a 50 km radius from the boundary of the Project Area, and using the extent of occurrence (EOO) for PBTL, using publicly available information from DCCEEW's EPBC Act Public Portal. Potential cumulative impacts to INTG, including impacts of other projects in the region, were captured and assessed based upon publicly available information on the EPBC Act Public Portal, which includes all referrals that include impacts or potential impacts to INTG, as outlined in Section 5 of the PD, and specifically for INTG, in Section 5.4.1.1. It is expected that any and all projects which impact INTG should be referred, thus Neoen believes the cumulative impact assessment captures the pertinent data re cumulative impacts. The draft INTG Offset Management Plan has been made avialable to DCCEEW for review, but was not available at the time of public comment.Neoen have committed to offsetting both permanent and temporary impacts to INTG at the proposed [redacted] INTG EPBC Offset site to ensure that any potential indirect impacts are captured, and the offset exceeds requirements. This also ensures that if areas of temporary disturbance do not eventually rehabilitate to to point of representing INTG TEC, that they are covered by a commensurate offset. Within the draft INTG Offset Management Plan, the impacts to INTG are summarised in Table 2.4 and include at total of 6.14 ha of INTG across the two stages of construction, which is comprised of 6.14 ha of Class B (i.e. TEC) (of which 2.43 ha is permanently impacted and 3.72 ha will be temporarily impacted). An additional 2.44 ha of Class C (not considered to meet the criteria for TEC) will be disturbed, of which 1.14 ha will be permanently impacted, and 1.30 ha will be temporarily impacted.	No change to PD	Not applicable
		INTG impacts		Recommendations in June 2025 INTG TEC Assessment Sect 4 is confusing. Two points accept impacts on Class B, with intent to refine design to reduce impact, while also promoting avoidance of Class C as much as possible. Reference to two previous recommendations, there is only one.	Neoen and Umwelt acknowledge that Section 5.4 of the June 2025 INTG TEC assessment may appear confusing. In particular, the reference to "two previous recommendations" is an error in this version of the report, as only one recommendation is listed. This error arose because an earlier version of the assessment considered impacts for two design options, including an alternate OTL route. In that earlier version, the second recommendation was: "*Avoid areas mapped as Class A INTG along the Proposed OTL Alternate, if selected* ." It is also noted that previous reports had recommended avoidance of INTG wherever possible. However, at the stage of this report version, it was clear that complete avoidance was not feasible within the constraints of the wind farm construction requirements. Accordingly, the recommendation was updated to reflect the status of the WF design at the time of writing, ensuring that guidance remained relevant and practicable. This report was also prepared prior to a further update to the design, and therefore lists the area of clearance as 12.43 ha, including 7.70 ha of clearance to Class B INTG. As the report represents a point in time, it has since been superseded. To clarify, the clearance now proposed is 8.59 ha of Lomandra Grassland, including 6.14 ha of Class B INTG. With respect to the recommendations on Class B and Class C INTG, the intent is consistent with the mitigation hierarchy: - Class B: Impacts are acknowledged, with design refinements proposed to reduce them as far as practicable. - Class C: Avoidance is promoted wherever possible, recognising that avoidance is the preferred outcome under the hierarchy. We agree that avoidance of Class B impacts should also be maximised, and this principle has guided ongoing design refinements. The recommendations should therefore be read as complementary, with avoidance prioritised wherever feasible and minimisation applied where avoidance cannot be achieved.	No	Not applicable
		On-ground SEB offset		NVC Clearance Application identified and secured area of land at 92 Civilization Gate Road as offset site. Not known what condition INTG and Austrostipa grassland at this site. Area known to MRLB and has mix of INTG condition classes. MRLB will need to review SEB Management Plan when available to ensure it promotes long term sustainability beyond 10 yr of monitoring. MRLB would be interesting in reviewing monitoring and management reports over the next 10 yr.	The SEB offset area at 92 Civilisation Road has been approved by the Native Vegetation Council for the Stage 1 native vegetation impacts, including impacts to INTG. The area is not currently proposed as an EPBC offset for INTG. The current SEB MP for 92 Civilization Gate Road includes a model for regular consultation with MRLB (and / or NYLB). This includes an on-ground start up meeting between relevant experts, Neoen and the on-ground SEB Area land manager to broadly assess the sites and discuss grazing management such as indicators and triggers; periodic engagement to review monitoring results and periodic engagement (biennial suggested) for on-ground meetings to assess progress. A stand alone EPBC offset for INTG is proposed at the [redacted] property which is now outlined in the INTG Offset Management Plan, [redacted] (which was not available at the time of public comment). The INTG Offset MP is provided with the updated PD package and available for review by DCCEEW. Section 9 of the PD which outlines the proposed approach to the EPBC offset requirements (including for INTG) has been updated to reflect the EPBC specific approach to INTG offsets.	Yes	Section 9.5 of the PD (INTG Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to INTG from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft INTG Offset Management Plan is now available as Attachment 21 of the PD which outlines details for proposed on-ground offsets for INTG. The Offset MP outlines how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		Mitigation measures - MRLB involvement		MRLB would like to build understanding of how effective mitigation measures are within footprint. Financial commitments supporting PBT monitoring? Periodic meetings could be facilitated with eco contractor managing site. Information provided in terms of mitigation and avoidance is difficult to see where existing tracks have been followed or new ones created. Makes difficult to visualise mitigations applied and what the outcomes were for INTG.	Neoen appreciate MRLB's interest in understanding the effectiveness of mitigation measures and in ensuring transparency around their application. The INTG Management Plan (MP) incorporates a comprehensive suite of mitigation measures designed to prevent indirect impacts to INTG outside both the permanent and temporary disturbance footprint. This document is currently undergoing review, follwing feedback from DCCEEW, including strengthening of language, increased monitoring and more defined triggers and corrective actions. Regarding monitoring commitments at GNWF, monitoring will include rehabilitation monitoring within the disturbance footprint, as well as targeted monitoring of nearby sites subject to potential indirect impacts (such as dust), alongside unimpacted control sites. This approach ensures that both direct and indirect effects are tracked and managed. Neoen welcomes feedback on proposed monitoring methodlogy and the MRLBs suggestion of periodic meetings with the ecological contractor managing the site, and will explore opportunities to facilitate ongoing dialogue to ensure stakeholders remain informed about monitoring outcomes and mitigation effectiveness. Regarding application of the mitigation hierarchy and its effectiveness, preliminary mapping was undertaken to avoid, wherever possible, overlap between the Disturbance Footprint and areas of Lomandra grassland. Subsequent on-ground assessments and targeted INTG surveys enabled more detailed mapping and informed the application of the mitigation hierarchy. Class A and B INTG TEC areas were prioritised for avoidance, with Class C Lomandra grasslands also avoided where feasible. The initial EPBC Referral Application (2024) identified 29.64 ha of potential impact to Lomandra grassland. Following design and construction reviews, the March 2025 EPBC variation submission reduced this to 12.43 ha — a 58% reduction. In response to feedback on the NVC clearance application (February 2025), Neoen reaffirmed its commitment to continued application of the mitigation hierarchy. Further design refinements were implemented in August 2025 — including alternate siting of ten towers along the OTL and re-routing of the access track to WTG 110 — to achieve a further 3.85 ha reduction (-30.97%) in total impact. This includes: - Class B TEC: reduced from 7.70 ha to 6.14 ha (-1.56 ha). - Class C Lomandra Grassland: reduced from 4.73 ha to 2.44 ha (-2.29 ha). A new map (Figure 4.41) has been prepared to more clearly show where the Disturbance Footprint, particularly in areas of INTG, overlaps with existing roads. In addition, Table 4.51 provides a clear breakdown of impacts to each patch, making the application of mitigation and avoidance measures more transparent. Further to this, minor discrepanciesin alignment with existing rural tracks (for example as a result of mismatch between state road data and actual onground location of existing tracks) are likely to be rectified during construction micrositing process, to align in the most logical location with existing tracks. This is likely to result in further minor reductions to the impact to Lomandra grassland in some locations.	Yes	A new map (Figure 4.41) has been prepared to more clearly show where the Disturbance Footprint, particularly in areas of INTG, overlaps with existing roads. Updates to related text also.
		Avoid and minimise impacts		Attachment 1 - Site ID 51 should be microsited to avoid direct impact of two species. Site ID 24 - please confirm - access road to turbine moved west in design iteration, avoiding segregation of INTG? Site ID 32 - Alternative routing of access track could avoid impacts (broken down into large explanation and detailed maps provided, refer to comment). MRLB wants to know if Neoen are willing to consider what has been put forward in Attachment 1.	Neoen thanks MRLB for the detailed suggestions provided in Attachment 1 and acknowledge the effort taken to identify potential refinements. Many of the proposed options have already been considered at various points in the design phase; however, they were determined not to be feasible due to engineering, access, or environmental constraints. Neoen remains committed to applying the mitigation hierarchy throughout the project lifecycle, including the use of micro siting during construction where on-ground conditions allow further reductions in impact. Some comments whic specifically address MRLBs suggested alternatives are presented below: - Patch 24: We confirm that this area was addressed as part of the August 2025 design refinements. The access track was moved further west to avoid intersecting this patch of INTG, thereby reducing potential impacts. - Patch 32: Alternative routing of the access track was examined during the design process. MRLB's recommendations are similar to options explored in June-August 2025, including proposals to access from the east. However, access from the northeast is not feasible as it would require upgrades to a large regional road network, and the existing track to the east is narrow, steep, sided by Mallee vegetation, and unsuitable for heavy vehicles. Additionally, other options suggested to avoid patch 32 were not adopted due to constraints around the length of the electrical cable. If those road options were adopted, electrical cabling would still require clearance through the patch (albeit narrower and temporary) if decoupled from the road. This was assessed as resulting in a greater impact from a PBTL perspective. - Patch 51: This patch will be considered a priority for micro siting during pre-construction surveys, subject to the layout of the land and feasibility of adjustments at that stage. - Other suggestions: Considerations have also been made in relation to topography and existing road networks. In the southeast, steep and rocky hills present constraints, and while closure of certain tracks may appear beneficial, these are regularly used by landholders. Closure would likely not be supported and could influence grazing patterns, watering points, and other land management practices, thereby posing indirect risks. Additionally, in this southeastern location, one length marked for removal includes electrical cabling (not a track) and cannot be removed from the design or aligned with proposed roads due to technical constrains (i.e. length of electrical cable from substation). Neoen values MRLB's input and will continue to explore opportunities for refinement during construction, applying micrositing and adaptive management where feasible to further minimise impacts.	No change to PD required	Not applicable

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
19/11/2025	[redacted]	Hydrology	Comment is anti-project, anti-Neoen and is derogatory to Neoen and their consultants.	Hydrology - no quantitative or qualitative information supplied on how construction of turbines will decrease water captured in this region. Removal of hilltops for concrete base result in decreased land surface area and area of water capture. Decrease in hill height decrease gravitational potential. These losses decrease volume of water captured and extent the volume can travel across ground surface. Blasting of hill tops increase sedimentation in captured water, which as well as fouling the water further decreases the area of surface flow due to increased friction. Depth of water courses become less over time due to aggradation of water course, with sediment filling fractures leading to the water table. Changing topography will divert from historical drainage channels, meaning co-evolved and reliant species are no longer supported.	Hydrology in and of itself is not a MNES and was therefore not considered in the GNWF referral, and was not requested to be addressed in the RFI for the Preliminary Documentation. Flood modelling was undertaken by WGA (2023) to assess the flooding for the existing condition, establish and delineate catchments contributing to the associated civil infrastructures, apply the Rain-on-Grid (RoG) approach, and develop and run flood models. Thereby, aiding in the identification of potential flood risks, inform Project design, and ensure resilience and compliance with regulatory requirements. Changes in hydrology and subsequent indirect impacts to MNES have been considered through the referral and Preliminary Documentation. Broadly, changes to surface water flows from access tracks and hard stands will be managed through design measures such as culverts where tracks cross waterways and drainage lines, in accordance with best practive and regulatory requirements. Without these measures in place, tracks and hard-stands would be subject to erosion risk. As the overall quantiy of surface water is expected to be the same, or only marginally reduced, no subsequent indirect impacts to MNES are expected from changes in hydrology. With respect to MNES —Iron-grass Natural Temperate Grassland (INTG) and PBTL—are not specifically associated with drainage lines for their persistence. INTG typically occurs on gentle slopes, while PBTL occupies grassland habitats and relies on soil structure rather than hydrological connectivity. Changes to hydrology of this nature (e.g., water quality and sedimentation accumulation in drainage lines) are not listed as specific threats for either INTG or PBTL in their respective conservation advices. The PBTL Conservation Advice notes that development can cause changes to hydrology from increased water runoff, which could impact soil structure and vegetation composition of PBTL habitat. These potential threats are being managed through specific mitigation measures outlined in the Construction Environmental Management Plan (CEMP), the PBTL Management Plan, and associated sub-plans (to be developed). These measures will be accompanied by regular internal auditing and periodic external auditing to ensure controls are effective. This approach ensures that any localised changes do not result in broader ecological impacts and aligns with EPBC Act requirements and best practice environmental management. Potential erosion and sedimentation will be managed through routine construction and operation management measures as outlined in the CEMP, and it is in Neoen's best interest to avoid erosion of hard stands (WTG pads) and access tracks over time to protect the asset and avoid impacting the Project's infrastructure. As such, it is not expected that 'depth of water courses will become less over time'. As such, no signficant changes to surface water flows or altered hydrology are expected as a result of the construction or operation of the GNWF, as outlined in Section ES1.7 Indirect Impacts, Section 3.3.3 Hydrology, Section 5.1.3 Erosion and sedimentation (including land slippage), Table 5.4 Potential indirect impacts associated with the Project, Section 5.2.7 Changes in Surface Water Flows / Altered Hydrology, and throughout a number of subsections in Section 7 including PBTL and INTG of the PD.	No change to PD required	Not applicable
		Hydrology		Prelim Enviro Site Assessment (Agon Enviro) specified "water occurrence within the local area is dependent on topography within area". This assessment identified major issue which has been ignored. Should have resulted in investigation into the projects impact on water occurrence. Landowners have not been advised this loss will occur.	Whilst water supply is not a MNES, direct and indirect impacts have been considered during the design process of the Project, with a number of considerations outlined in the response above. The bulk of the water demand is during construction phase. Neoen are currently finalising a groundwater study to inform potential use of groundwater, should a sustainable supply be determined. A portion of the water required during construction is for the production of concrete which requires a quality that is acceptable for concrete batching. Pending the results of the groundwater study, carting this requirement in from Burra to meet this portion of the water demand as a minimum could emerge as the most viable option. Further, Neoen have been developing studies associated with understanding the topography of the Project Area, and have undertaken and continue to develop the following: - LiDAR surveys (with data provided by Aerometrex) to understand detailed contours of land including waterways (currently unpublished works by Alexander & Symonds Pty Ltd, 2023) - WGA Goyder North Wind Farm Flood Modelling (2023), with ongoing development of 3D civil designs, incluidng drainage, to determine the potential impact on existing natural flow paths, noting this process will also optimise road placement to avoid creeks where possible and utilise the natural land contours to minimise earthworks and flow impacts These studies will inform detailed civil and drainage design to finalise the placement of roadside drainage, and culverts where necessary; and any additional future works which may be required prior to construction.	No change to PD required.	Not applicable
		Water allocation for construction		Need to address the no cap on water allocation that this construction will take from local bores and water courses.	The bulk of the water demand is during construction phase. Neoen has also engaged expert hydrologists to undertake a construction water sourcing assessment to ensure that any groundwater used during construction is sourced sustainably. A portion of the water required during construction is for the production of concrete which requires a quality that is acceptable for concrete batching. Pending the results of the groundwater study, carting this requirement in from Burra to meet this portion of the water demand as a minimum could emerge as the most viable option.	No change to PD required.	Not applicable
		Giant undescribed worm		Worm - Initial eco assessment found undescribed giant worm. This is significant discovery that needs to be researched as species are susceptible to damage from earthworks and construction. Important in areas of poor soil/low nutrient value.	We acknowledge the comment regarding the discovery of an undescribed giant worm during the initial ecological assessment and recognise the importance of further research into species that may be susceptible to disturbance from earthworks and construction, particularly in areas of poor or low-nutrient soils. The giant worm is not listed as a Matter of National Environmental Significance (MNES) and was therefore not considered within the GNWF referral, nor was it requested to be addressed in the Request for Information (RFI) for the Preliminary Documentation. Specimens were collected by Umwelt in consultation with relevant experts and lodged with the South Australian Museum for further analysis and identification. At this stage, no further progress or communication has been received regarding the status of the specimen. Neoen will continue to monitor updates from the South Australian Museum and relevant experts, and remains committed to applying the mitigation hierarchy to minimise impacts to ecological values across the project footprint.	No change to PD required.	Not applicable
		INTG impacts INTG rehabilitation		INTG main distribution in Flinders-Lofty Block Bioregion, with only 1% of the original INTG footprint remaining in the state. What is in the region is already fragmented. Iron grass communities are susceptible to damage from soil disturbance, which can result in weeds that outcompete over 100 inter-tussock community species. To undertake restoration, it is estimated that, at the lower range, eight million plants are required and a minimum cost of 100 million dollars ([redacted].	DCCEEW have received the draft INTG Management Plan and have had the opportunity to review the mitigation measures which are proposed to avoid soil disturbance and weed incursion into areas of INTG. Concurrently, CEMP and OEMP measures will be in place throughout the Project's construction and operation phases. Neoen acknowledges the residual impacts to INTG and PBTL arising from the GNWF Project, and has undertaken a thorough program of ecological surveys and assessments to fully understand the extent of the impacts, and to enable design modification to reduce impacts as far as practicable. Neoen have been transparent with both state and commonwealth agencies throughout this process, and have recently received approval for the Project under the Native Vegetation Act, despite impacts to INTG. An INTG Management Plan and draft INTG Offset Plan are now available for consideration by DCCEEW. Proposed offsets for INTG address both permanant and temporary disturbance to the TEC and will result in the establishment of a conservation covenant over areas of INTG providing protection for this TEC into the future, along with management measures designed to improve the quality of INTG. The Offset Plan follows the DCCEEW Offset Policies and is in-line with the required offseting process under the EPBC Act for unavoidable residual impacts to MNES. Data from [redacted], a fellow opponent of the Project, is cited regarding restoration of INTG, but the statement does not detail the area of restoration this refers to and cannot be verified. Restoration actions (and monitoring) which are proposed for areas of INTG which are temporarily disturbed are detailed in the INTG MP (Section 11).	No change to PD required.	Not applicable
		SHNW		SHNW - undertaken previous field assessment on GSWF. Disagreement with the management of SHNW on Goyder South which was raised with appropriate personnel. Matters discussed over 2024/2025. Notes that a similar Wombat Management Plan for Goyder South will be adopted at Goyder North.	SHNW is not a MNES and was therefore not considered specifically in the GNWF referral, and was not requested to be addressed in the RFI for the Preliminary Documentation. Neoen acknowledges the presence of SHNW within the GNWF Project Area, with known occurences mapped within an Ecological Assessment Report (Umwelt 2025), which identified at least 35 active SHNW locations. Neoen commits to minimising impacts on this native species, and has addressed potential management of SHNW within the CEMP. This includes developing a specific Southern Hairy-nosed Wombat Management Plan for the Project using best practice methods to first avoid and then minimise impacts to SHNW. This will inlcude identification of active SHNW warrens during Pre-clearance Check surveys, and ongoing identification of active areas throughout construction; micrositing of infrastructure around identified locations if possible; and relocation of SHNW if required using best practice methods as guided by relevant experts. Neoen has met with local environmental experts and received feedback on the implementation of the Wombat Management Plan for Goyder South Windfarm. Learnings from this discussion will be incorporated into the SHNW MP for GNWF, including, but not limited to, development and review of the MP by subject matter experts.	No change to PD required.	Not applicable
		PBTL impacts (shadow flicker)		PBTL - Outlines stressors relating to the species and population numbers. Raises concern of shadow flicker, placing PBTL at significant risk because they use spider burrows for refuge, and if shadows flicker across burrow entrances this severely impacts their daily activities. May lead to disruption in foraging/hunting, thermoregulation and breeding cycle. Reliant on Wolf and Trapdoor spider for its burrow. Impact on WF on spider populations have not been assessed. Disagrees with PBTL Management draft stating WT typically installed on hill slopes and crests which are often not optimal for PBTL habitat, which she believes contradicts expert advice.	The impacts of shadow flicker have been assessed in detail in the Preliminanary Documentation, and notably presented to both the PBTL recovery team and Nature Foundation (WRT set back distances of WTG from Tiliqua and Mokota conservation reserves). Both stakeholders agreed with the approach which was developed and noted that it is likely conservative in terms of impacts to PBTL. Residual indirect impacts to PBTL as a result of shadow flicker have been included in the overall residual impacts to PBTL and are therefore covered by an EPBC offset specifically for PBTL. The comment rightly notes that we do not yet properly understand the potential impacts of shadow flicker on spiders. The research project which is comencing for the Goyder South Project aims to better understand potential impacts to both lizards and spiders in proximity to WTGs.	No change to PD required	Not applicable
		Ecological assessments		Ecological Assessments - not independently undertaken. Assessments utilise Clean Energy Council Guidelines which [redacted] believes are formulated to maximise project approvals. While NVC accredited consultants are required for veg assessments, there is no equivalent for wildlife assessments. [redacted] goes on to discuss concern for assessments undertaken by appointed ecological contractor previously (refer examples 1-10 in comment).	In field ecological assessments have been undertaken over several years by EBS Ecology (now Umwelt) as an independent consultant. Desktop assessments have also been undertaken by Lathwida Environmental. Both companies are well respected within industry and with state and Commonwealth regulators and have many years of combined experience. During this period, engagment has occurred with relevant organisations such as the Landscapes Board(s), the PBTL recovery team, state and Commonwealth regulators regarding the survey methods employed, methods for estimating population numbers, outcomes of INTG assessments, shadow flicker assessments, and in all instances, agreement has been reached that the studies undertaken are sound, based on robust data, and in many cases are conservative in their approach regarding impact assessments. The Clean Energy Council Best Practice Guidelines (CEC 2018) were used to support field surveys and to fulfil regulatory requirements. These guidelines provide a framework for planning and environmental approvals, including the minimum survey requirements during the initial stages (such as bird and bat utilisation surveys). Additional, site specific survey requirements are then determined by ecological consultants based on initial findings. For GNWF this has included a comprehensive suite of targeted surveys for species such as PBTL, INTG, FRWL, MBC, and other threatened flora and fauna, as well as vegetation surveys conducted to the standards of the South Australian Government's Native Vegetation Council. All surveys have been undertaken in accordance with the relevant best practice and State or Commonwealth survey guidelines for each species or group, where available, and have produced robust, high-quality datasets for the site. This comment reflects a misconception that consultants are not independent because they are paid for by the proponent. In reality, any consultant who did not provide independent and realistic survey outcomes and/or advice would quickly be identified by regulators and would not be in business for very long. It is unrealistic to expect the amount of survey effort and assessment reporting which is required by state and Commonwelath governments for project approval to be paid for by anybody other than the proponent, as the costs of the 'approvals process' are substantial.	No change to PD required	Not applicable

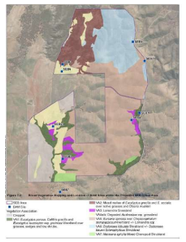
Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		On-ground SEB offset Mitigation hierarchy		SEB - Site does not present like for like. Does not support SHNW, contains minimal iron grass and will therefore not offset loss of Lomandra grassland. She doesn't believe what is put forward is trackable, or measurable. [redacted] believes the mitigation hierarchy has not been followed.	The SEB site is required under the Native Vegetation Act, not the EPBC Act, and is not the focus of the Preliminary Documentation or supporting documents which are part of the EPBC assessment process. The SEB site is established for the loss of native vegetation, not for SHNW. The SEB site has already been approved by Native Vegetation Council as a suitable offset for impacts to native vegetation (and the habitat it represents), including to INTG. It is noted that an additional EPBC offset is proposed specifically for INTG which is in addition to the SEB. Details regarding the SEB are at a high level only in the Preliminary Documentation, as this document addresses EPBC MNES protected under the EPBC Act 1999, not the *Native Vegetation Act 1991* requirements. Regarding the SEB site, the approval of the clearance and offset by Native Vegetation Council suggests that the mitigation hierarchy has been applied to the satisfaction of the Council. Application of the mitigation hierarchy is one of the key principals of the Native Vegetation Act 1991, and approval for the clearance has been granted by the Native Vegetation Council, indicating their satisfaction that the heirarchy has been applied. The mitigation hierarchy has been applied throughout the planning and development phase of the GNWF, with iterative design and approvals documents. Further micrositing prior to construction is planned to further alleviate impacts to key MNES. Section 6 of the PD (pages 291 - 322 , i.e. over 30 pages) outlines in detail the measures to avoid, minimise and then mitigate impacts, and includes data regarding the amount of reductions to native vegetation clearance which have been achieved since the earlier referral (e.g. from 595.78 ha in the October 2024 referred design to the current 453.87 ha - see page 302 of the PD). Design modifications have focused on reducing impacts to the most important habitats, such as PBTL habitat or INTG TEC (or potential TEC (Class C INTG). Reductions in disturbance area are highlighted on Figure 6.2 (maps 1 to 3, pages 304-306 of PD).	No change to PD required.	Not applicable
19/11/2025	[redacted]	Visual impacts to Burra and National Heritage Township. Impacts to landscape and habitat for native animals.	Comment is anti-project	The comment received is against this project and hopes it does not go ahead. Commenter is concerned the WTGs are too close to the heritage listed town and will ruin the landscape and habitat for native animals	The visual impacts of the GNWF on the National Heritage listed Australian Cornish Mining Sites (Burra township) were considered in the EPBC referral for the GNWF, and were also were assessed through the State Development Application process. The referral was supported by visual modelling and assessment undertaken by Biosis (2024) which concluded that the National Heritage Listed township of Burra was approximately 2.7km from the Goyder Renewable Energy Facility at it's closest point. Views from the township of Burra are not cited in the National Heritage criteria, or the State Heritage statement of significance, and the Goyder North Project was determined to not have a significant impact on the Nationally-Listed Heritate site, as defined by the Significant Impact Guidelines 1.2. The Heritage Listed site was not included as a controlling provision in the 'controlled action' decision from the referral, and further assessment of the Heritage -Listed site was not requested in the Request for Information for the Preliminary Documentation. No specific concerns to address regarding landscape and habitat for native animals. Impacts to flora and fauna are assessed through thorough investigations over several years, and through the Native Vegetation Act and EPBC Act assessment processes, with offsets either already approved (SEB) or proposed (EPBC Act) to account for residual impacts, as per the NV Act and EPBC Act processes.	No change to PD required.	Not applicable
Comments received after Close of Business (5pm) 19 November 2025							
19/11/2025	[redacted]	EPBC Offset Strategy	Comment neutral, yet raises constructive concerns around offset strategy	[redacted] concern surrounds the EPBC Offset Strategy for INTG and PBTL. Comments surround the requirements of the EPBC Act Environmental Offsets Policy 2012 (the Policy) and the How to use the Offset Assessment Guide (the Guide). [redacted] outlines Neoen has failed to demonstrate suitable direct offsets for protected matters. There are no tangible, physically direct offsets proposed, and the offset strategy does not detail the method used by Neoen to score from 0-10 INTG and PBTL quality.	Broadly, the comments received here identify gaps in the (high level) Offset Strategy (which was provided with the Preliminary Documentation for Public Comment) which are now covered in the Offset Management Plans - a subsequent step in the development of the EPBC offsets which was not available at the time of public comment. This process of Offset Strategy followed by more detailed Offset Management Plans follows the draft DCCEEW guidance, and has been agreed with DCCEEW from early on in the approval process, which the commenter may not be aware of. Draft INTG and PBTL Offset Management Plans are now with DCCEEW for review which provide the details which are flagged as insufficient or missing by the commenter. Specifically: - suitable direct offsets for Stage 1 impacts to PBTL are outlined in the Pygmy Blue-tongue Lizard Offset Management Plan - [redacted]. Section 4.1 Table 4.1, Section 4.1.5 and Section 4.2. - suitable direct offsets for Stage 2 impacts to PBTL are outlined in the Pygmy Blue-tongue Lizard Offset Management Plan - [redacted]. Section 4.1 Table 4.1, Section 4.1.5 and Section 4.2. - suitable direct offsets for Stage 1 and 2 impacts to INTG are outlined in the Iron-grass Natural Temporate Grassland Offset Management Plan - [redacted]. Section 4.1 Table 4.1, and Section 4.2. Habitat quality scores are outlined each of the Offset Management Plans in Sections 3.3.4 for PBTL impact sites, Section 3.6.4 for INTG impacts sites, Sections 4.2 for PBTL offset sites, and Section 4.4 for INTG offset site. The PD has been updated to reflect the current status of the offset management plans.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		EPBC Offset Strategy		For INTG, impact site quality is incorrectly derived and no commitment to ensuring offset sites attain and maintain minimum INTG Class B condition. Proposed/potential indirect offsets [impacts?] should be assessed as direct offsets [impacts?]. For PBTL, the strategy points to offset scarcity, and to compensate for this speculates on various ambiguous offset project ideas.	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. More specific details are now available in the INTG and PBTL Offset Management Plans. Section 3.6.4 Table 3.8 of INTG OMP assesses the INTG impact sites in line with the DCCEEW Offsets Assessment Guide. Both permanent and temporary impacts to INTG (Class B) are included in the offset calculations for INTG, which are presented in the INTG Offset Management Plan (draft with DCCEEW for review), which was not available at the time of Public Comment. No Class A INTG is impacted by the GNWF. PBTL Offset Management Plans (for Stages 1 and 2) now clearly articulate the plan to achieve PBTL offset requirements which meet the offset policy requirements. The earlier high-level options provided in the Offset Stratgey were presented as the final offset options were being developed, as discussed with DCCEEW on several occassions. The PD has been updated to reflect the current status of the offset management plans.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		EPBC Offset Strategy		Statements Neoen have developed with respect to offsets for both give no confidence there is a viable pathway to secure and manage suitable offsets. Reference made to 2022 approval for Goyder South, stating Neoen must have become aware of the offset scarcity.	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. More specific details are now available in the INTG and PBTL Offset Management Plans. Whilst offset options have been challenging to identify, Neoen now have tangible on-ground offsets proposed for both PBTL and INTG (for both Stages 1 and 2 development), coupled with research focused on better understanding effectiveness of mitigation strategies for PBTL, and contigency options to meet the GNWF's offset requirements. The draft INTG and PBTL Offset Management Plans which are now with DCCEEW for review include: - for Stage 1 impacts to PBTL: the Pygmy Blue-tongue Lizard Offset Management Plan - [redacted] - for Stage 2 impacts to PBTL: the Pygmy Blue-tongue Lizard Offset Management Plan - [redacted] - for Stage 1 and 2 impacts to INTG: the Iron-grass Natural Temporate Grassland Offset Management Plan - [redacted]. The PD has been updated to reflect the current status of the offset management plans.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		EPBC Offset Strategy		The quality score are required for the impact site, offset site at commencement and during the future with and without offset. It is therefore critical to offset evaluation that the same quality scoring method, metrics and thresholds are used. Table 2.9 and 3.9 score INTG and PBTL quality at impact sites, however, the lack of a documented quality scoring method, with precise metrics and threshold values is a failing of the strategy. The strategy should be revised to comply with the guide. Suggested SMEs are engaged to derive or review the quality scoring framework.	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. More specific details are now available in the INTG and PBTL Offset Management Plans. Draft INTG and PBTL Offset Management Plans which are with DCCEEW for review provide the details for the habitat assessment scores which were used in the Offset Calculator, which use the DCCEEW Offset Assessment Guidelines, and which apply DCCEW's draft PBTL habitat assessment matrix (results of which have been reviewed with DCCEEW). Specifically: For PBTL Stage 1 impacts, refer to the PBTL Offset Management Plan, [redacted] Habitat quality scores for the PBTL impacts sites are in Sections 3.3.4 (Table 3.7), and for the offset site at commencement and under future scenarios in Sections 4.2 (Table 4.4), with Offset Assessment Guide Scores in Section 4.2.1 (Table 4.5) and further details in Appendix E. For PBTL Stage 2 impacts, refer to the PBTL Offset Management Plan, [redacted] Habitat quality scores for the PBTL impacts sites are in Sections 3.3.4 (Table 3.7), and for the offset site at commencement and under future scenarios in Sections 4.2 (Table 4.4), with Offset Assessment Guide Scores in Section 4.2.1 (Table 4.5) and further details in Appendix E. For INTG Stage 1 and Stage 2 impacts, refer to the INTG Offset Management Plan, [redacted] Habitat quality scores for the PBTL impacts sites are in Sections 3.6.4 (Table 3.8), and for the offset site at commencement and under future scenarios in Sections 4.4 (Table 4.5), with Offset Assessment Guide Scores in Section 4.4.1 (Table 4.6). The PD has been updated to reflect the current status of the offset management plans.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		EPBC Offset Strategy		INTG - The Guide does not require species stocking rate to be considered when assessing quality of an ecological community. They go onto discuss the questions listed within the Guide. Goes onto state the keystone/diagnostic species endemic to INTG are assessed through the site condition component. Other than for Goyder South, the EPBC notices page shows limited instances of TEC offsets in SA to benchmark this approach. Evaluation target species habitat quality are not a feature of quality assessments for TECs in other jurisdictions. Does not request Neoen adapt assessments in other jurisdictions, rather note that the species stocking rate is not required and this should be redone to comply with the Guide. Table 2.9 incorrectly calculates a total score of 6/10 which should be 7/10. If start quality is Class C, then to compensate for impacts to diagnostic Class B, the offset must at minimum attain the quality of the listing criteria and Class B within the time to ecological benefit. This commitment should be made in the strategy and offset management documents, and metrics for diagnostic INTG Class B underpin monitoring, reporting. This proposal is for on-ground direct offsets, and should be subject to securement and offset assessment principles and practices used for the minimum 90% direct offset, rather than through financial contributions.	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. More specific details are now available in the INTG and PBTL Offset Management Plans. The INTG Offset Management Plan, [redacted] addresses the specific habitat scores applied to the INTG impact areas and offset location for both INTG Stage 1 and Stage 2 impacts. Habitat quality scores for the PBTL impacts sites are in Sections 3.6.4 (Table 3.8), and for the offset site at commencement and under future scenarios in Sections 4.4 (Table 4.5), with Offset Assessment Guide Scores in Section 4.4.1 (Table 4.6). It is acknowledged that this information was not available at time of public comment. For INTG, 100% of the offset requirements are achieved through on-ground offsets, as outlined in Section 2.4 (Tables 2.6 and 2.7) of the INTG Offset Management Plan - [redacted]. The PD has been updated to reflect the current status of the offset management plans.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		EPBC Offset Strategy		PBTL - Strategy commits to offsets for impacts to 20.04 ha of known and 348.06 ha of likely habitat. Strategy gives no confidence that suitable offsets are available (goes on to list the reasons why).	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. More specific details are now available in the INTG and PBTL Offset Management Plans. The two PBTL Offset Management Plans ([redacted] and [redacted]) combined with proposed research-based compensatory measures, enable the full PBTL offset requirements to be met. Section 2.4 (Tables 2.6 and 2.7) of both PBTL Offset Management Plans provides an overview of the overall approach to achieving the required offsets for PBTL for the GNWF. We also note that a contingency additional potential PBTL offset property has already been secured by Neoen, i.e. the offset property located at 92 Civilization Gate Road, Mount Bryan East, covering approximately 1,297.23 ha to the north of the GNWF Project Area. This property has been approved by the Native Vegetation Council as a Significant Environmental Benefit (SEB) offset under the Native Vegetation Act 1991 for a portion of the native vegetation impacts arising from the Project. It also includes potentially suitable habitat for PBTL, totalling 305.87 ha (comprising native grassland, historically cropped grassland more than 20 years old, and Lomandra grassland), as well as 44.94 ha of Class B and Class C INTG. This site provides an additional contingency for PBTL offsets within the overall proposed GNWF offset package, ensuring flexibility should any currently unrealised impacts arise during the project. The PD has been updated to reflect the current status of the offset management plans.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		EPBC Offset Strategy		Commenter states that the PD claims there are six patches of Class C INTG within GNWF Project Area which are being considered for the offset. Appendix 1 of the Strategy , the total area of INTG Class C patches in the same area totals 308 ha. A total 2,114.72 ha of surveyed PBTL habitat is present in the GNWF area. Concerns are raised surrounding 'research component equivalent to 10% of the offset...to investigate the relocation success of PBTL'. Commenter suggests that this and other research proposals required to design and implement direct offsets are not indirect offsets, but intrinsic to delivering some of these and direct offsets for future stages.	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. The high level Offset Strategy considered a number of potential offset options, some of which have now been abandoned as more suitable options have firmed up. More specific details are now available in the INTG and PBTL Offset Management Plans. The Offset Managament Plans now define the proposed INTG offset area as the [redacted] property. The 6 patches previously considered in the Offset Strategy as an offset option are no longer being considered. Class C INTG patches do not meet the criteria for the TEC. Regarding the 10% research component of the PBTL overall offset, we note that DCCEEW have indicated throughout the engagement process that other compensatory measures, even beyond 10%, would be considered by DCCEEW given the value they provide, particualrly regarding PBTLs. Section 2.4 of the Offset Management Plans provides an overview of the overall approach to offsets for the GNWF, and outlines the % of on-ground offset for PBTL and the remaining research components (15.43% of the PBTL offset requirement). The research focus targets the effectiveness of proposed mitigation measures for PBTL (relocation and controls regarding population fragmentation). The PD has been updated to reflect the current status of the offset management plans.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		EPBC Offset Strategy		Other Matters - the Strategy may constrain subsequent decision making, in particular where subordinate offset management plans are conditioned in the approval to be consistent with the Strategy. The OMPs will include a detailed monitoring program, but Neoen appears to seek to limit offset monitoring obligations, despite providing no information on offset start and future qualities, effectiveness of measures and precautionary timeframes for demonstrating offset completion. Expected outcomes for INTG and PBTL offsets including to maintain and increase the condition/quality of the offset areas. If this outcome isn't possible, then the offset is not suitable. Seek to pre-empt offset quality outcomes otherwise serviced from evidence-based assessments. Page 20 states 7.75 ha area of temporary INTG disturbance, which will be rehabilitated using best practice methods. Has Neoen provided DCCEEW evidence of the nature of the temporary disturbance? With supporting evidence, demonstrating INTG will be rehabilitated to pre-disturbance condition over the short term? Why does this impact not require offsetting?	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. More specific details are now available in the INTG and PBTL Offset Management Plans. Condition of EPBC approval are expected to link to the (currently draft) Offset Management Plans rather than the high-level Offset Strategy proivided with the PD. The Offset Managament Plans do provide detailed monitoring and evaluation programs (Section 6 in all three plans). A statement of objectives for each of the EPBC offset properties is provided in Section 4.5 of the INTG Offset Management Plan and in Section 4.3 of the two PBTL Offset Management Plans and includes the objective of maintaining or improving the quality of the offset area for the target MNES. The objectives are considered achieveable with the management measures proposed. Both perm and temprary impacts to INTG TEC (i.e. Class B) are considered as residual impacts to INTG and used in the calculation for offsets, based on the uncertainty regarding whether INTG will successfully rehabilitate following disturbance. i.e. a conservative approach has been taken. A summary of the impacts to INTG and the required offsets is provided in the INTG Offset Management Plan, [redacted]. The PD has been updated to reflect the current status of the offset management plans. Above and beyond meeting the required offset obligations for INTG, Neoen also proposes to rehabilitate the temporary INTG disturbance footprint at the project site in accordance with the INTG MP. This is in addition to also meeting 100% of the offset obligations on-ground.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
		EPBC Offset Strategy		The risk assessment at Table 4.5 is not fit for purpose as it confuses risk with consequence, does not address offset scarcity, nor potential failure to improve the quality of Class C INTG offsets to diagnostic criteria and Class B quality by the time to ecological benefit.	As above, the comments provided refer to the (high level) Offset Strategy which was presented in the PD for Public Comment. More specific details are now available in the INTG and PBTL Offset Management Plans. Revised risk management plans are presented in Section 7 of each of the Offset Management Plans, to manage risks which may prevent achievement of the environmental outcomes expected to be achieved by the offset sites. Some of the risks associated with securing of offset properties have been presented to and reviewed by DCCEEW previously.	Yes	Section 9 of the PD (Offset Section) has been comprehensively revised to reflect the now proposed mechanisms (on-ground offsets and other compensatory measures) of achieving the offsets for residual significant impact to MNES from the Project, noting that Section 9 previous provided a high level Offset Strategy only. Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of 3 proposed on-ground offset properties. The Offset MPs outline how habitat condition has been scored at both impact and offset sites, and the plan's alignment with DCCEEW's offset Policy and principles.
24/11/2025	South Australian Government (DEW) - [redacted]	Administrative	Formal government comments - letter	A review of the documentation has been undertaken and comments have been collated and attached to this letter: - Enclosure 1 EPBC Act Matters - Attachment A State Matters	Covering letter only for comments raised in Enclosure 1 and Attachment A (each addressed below). No response required.	No change to PD required.	Not applicable.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
24/11/2025	South Australian Government (DEW) - [redacted]	WTG setback from INTG	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 1 Table 6.1, S 6.1.2, Pg 295 **WTG Setbacks from INTG** The PD states in Table 6.1 to set back WTG from Mokota Conservation Park by 450m to avoid impacts on conservation values and significant populations of INTG. Given a buffer has been applied of 450m to avoid impacts, should consideration of a buffer also be extended to other stands of INTG in order to mitigate impacts where clearance is not proposed for INTG within the Project Area?	The mitigation heirarchy has been applied as far as practicable throughout all stages of Project development to date, and will continue to be applied through pre-construction clearance surverys for MNES, and residual impacts, both direct and indirect, will be offset, including for temporary disturbance to INTG. Particular attention was provided to the conservation values within conservation reserves, given they already have conservation protection and are presumably of higher value (or have the potential to be of higher value). Further design changes at this stage would have significant impacts to the already finalised power purchase agreements, the Project's investment decisions, and to all impact assessment documentation and are not considered feasible. The application of the mitigation hierarchy has been achieved to the satisfaction of the Native Vegetation Council, who have provided approval for the Project under the Native Vegetation Act 1991.	No change to PD required.	Not applicable.
		Mokota CP - support from Neoen	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 2 Table 7.49, P 437 Offsetting **NEOEN Volunteering Conservation of YMN NPWS' Mokota Conservation Park** Table 7.49 of the PD, under heading Operation - Offsetting states that Neoen are exploring ways they might be able to enhance the values or contribute to future preservation of Mokota Conservation Park including where a known population of Trailing Hop-Bush occurs. This is an above and beyond measure proposed by Neoen, as no impact is expected and thus no offset is required. DEW welcome support for the Mokota CP, regarding INTG, and would like to discuss this further.	Comment only, no response required Neoen maintains its commitment to explore ways to enhance the values or contribute to the future preservation of Mokota CP, and will continue to engage with DEW and the NPPL team.	No change to PD required	Not applicable.
		INTG condition assessments	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 3.i INTG Assmnt Rpt Figure 5.1, Pg 26 **Accuracy of INTG Condition Class Mapping** DEW recognises that Neoen may not have access to all data on INTG to accurately consider condition classes. Several aspects of the description of INTG surveys suggest Condition Class mapping may not have the greatest confidence. Condition Class Mapping of INTG for Mokota CP by Umwelt (Figure 5.1) is different to the preliminary draft mapping undertaken by the Murraylands and Riverland Landscape Board (MLRLLB) (copy figure provided in comment) with the latter identifying Class A INTG and producing finer detail in the classification, contray to Figure 5.1 which maps INTG uniformly as Class B.	NTG condition class assessments were initially targeted to areas within the disturbance footprint and did not include detailed surveys within Mokota Conservation Park, which was excluded from the Project design. The material difference between the two mapping approaches is minor: areas mapped as Class C INTG would not be considered impact to the TEC, whereas Umwelt's precautionary mapping (Class B overall) results in higher consideration of the TEC in this location. The data comparison between Umwelt and DEW was presented to DCCEEW for review. While there may be some discrepancies between the dataset presented in the preliminary documentation and mapping provided by DEW, the methods used by Umwelt were targeted and project-specific, refined to the project area. These minor differences represent trade-offs between areas, where impacts may appear greater in some areas and less in others; however, overall, the mapping is considered conservative. Overall, the survey methodology and advice outlined in the Recovery Plan and EPBC Act Policy Statement 3.7 were followed, and the surveys undertaken by Umwelt adhere to valid and correct processes as described in Section 3.1.2.3 of the Preliminary Documentation.	No change to PD required	Not applicable.
		INTG condition assessments	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 3.ii INTG Assmnt Rpt Table 4.2 DEW recognises that Neoen may not have access to all data on INTG to accurately consider condition classes. Several aspects of the description of INTG surveys suggest Condition Class mapping may not have the greatest confidence. Table 4.2 states the assessment of INTG on GNWF was not undertaken in good seasonal conditions or within two months of effective rain as per the recommendations in the Survey Methodology in the Conservation Advice and National Recovery Plan. The condition classification depends upon broad leaf, seasonal species being detected and the number influences the condition class assigned. Surveying in suboptimal conditions could mean areas of INTG are classified into a lesser condition or not classified as INTG at all. As illustrated by comment regarding figures above and that no A class has been identified.	Umwelt has compared its mapping with that provided by the Landscape Boards and, in most cases, finds that the condition class assessments applied by EBS/Umwelt are conservative in comparison. The INTG Assessment Report focuses on the targeted INTG assessment period; however, it is important to note that condition classes were informed by multiple surveys undertaken across three years, including periods of ideal conditions (2022) and less-than-ideal conditions. Table 3.3 in the Preliminary Documentation details the adequacy of the survey methodology against relevant criteria. Despite suboptimal conditions during the targeted survey in October 2024, the survey was conducted within two months of effective rainfall. Spring annuals were present—albeit drying off. Umwelt utilized all available information, including data from multiple seasons, and applied a precautionary approach when assigning condition classes. In cases where seasonal conditions may have influenced detectability, INTG was upgraded to the nearest higher classification (e.g., Class A or B). Given the survey methodology and guidance in the Recovery Plan and EPBC Act Policy Statement 3.7, the surveys undertaken by Umwelt follow valid and correct processes as described in Section 3.1.2.3 of the Preliminary Documentation.	No change required to PD	Not applicable.
		INTG condition assessments	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 3.iii INTG Assmnt Rpt Table 4.2, S 3.2 DEW recognises that Neoen may not have access to all data on INTG to accurately consider condition classes. Several aspects of the description of INTG surveys suggest Condition Class mapping may not have the greatest confidence. Table 4.2 states INTG surveys should be undertaken at least two months after a disturbance such as grazing, however it is stated this occured during high levels of livestock grazing and that grasses were difficult to distinguish to species level Section 3.2 states that native grasses were often grazed to ground level, were highly modified in structure and with no mature seeds available for identification. This is highly likely to lead to inaccuracies in assessing INTG condition class, as the number of grass species influences the condition class results and could result in patches of INTG classified into a lesser condition or not classified as INTG at all	Umwelt has compared its mapping with that provided by the Landscape Boards and, in most cases, finds that the condition class assessments applied by EBS/Umwelt are conservative in comparison. The INTG Assessment Report focuses on the targeted INTG assessment period; however, condition classes were informed by multiple surveys undertaken across three years, including periods of ideal conditions (2022) and less-than-ideal conditions. Table 3.3 in the Preliminary Documentation details the adequacy of the survey methodology against relevant criteria. Despite high levels of livestock grazing during the targeted survey in October 2024, the survey was conducted within two months of effective rainfall. Spring annuals were present—albeit drying off—and grasses were identifiable to genus level and, in many cases, to species level. Where identification was limited due to grazing or lack of seed heads, if available, other survey information was used to supplement species determination within the patch. Typically, the number of grass species was not a limiting factor in condition class assessment, and where uncertainty remained, the precautionary approach was applied. As the entire Project Area occurs on agricultural grazing land, it is not possible, nor will it ever be possible, to undertake surveys under completely ungrazed conditions. In cases where grazing or seasonal factors influenced assessments, EBS/Umwelt upgraded INTG to the nearest higher classification (e.g., Class A or B). Umwelt utilized all available information, including multiple seasons of surveys, and applied the precautionary approach to ensure conservative outcomes. Given the survey methodology and guidance in the Recovery Plan and EPBC Act Policy Statement 3.7, the surveys undertaken by Umwelt follow valid and correct processes as described in Section 3.1.2.3 of the Preliminary Documentation.	No change required to PD	Not applicable.
		INTG condition assessments	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 3.iv INTG Assmnt Rpt S 3.2 DEW recognises that Neoen may not have access to all data on INTG to accurately consider condition classes. Several aspects of the description of INTG surveys suggest Condition Class mapping may not have the greatest confidence. Section 3.2 states that to mitigate these issues, areas with Lomandra species covering more than 10% of the assessed patches were considered Lomandra Grassland if the factors conveyed in points (ii) and (iii) were also present. By using the term Lomandra Grassland, it is difficult to know if this was included specifically as INTG	Umwelt has compared its mapping with that provided by the Landscape Boards and, in most cases, finds that the condition class assessments applied by EBS/Umwelt are conservative in comparison. As previously stated Umwelt utilized all available information, including multiple seasons of surveys, and applied the precautionary approach to ensure conservative outcomes. Given the survey methodology and guidance in the Recovery Plan and EPBC Act Policy Statement 3.7, the surveys undertaken by Umwelt follow valid and correct processes as described in Section 3.1.2.3 of the Preliminary Documentation. The terms Lomandra Grassland and INTG can be used interchangeably, however typically Lomandra grassland refers to areas which do not meet the listing criteria to classify as the Threatened Ecological Community (i.e. Class C INTG).	No change required to PD	Not applicable.
		INTG condition assessments	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 3.v INTG Assmnt Rpt S 3.2 DEW recognises that Neoen may not have access to all data on INTG to accurately consider condition classes. Several aspects of the description of INTG surveys suggest Condition Class mapping may not have the greatest confidence. Section 3.2 states the estimate of Lomandra plants were subjective and could vary from surveyor to surveyor.	Umwelt has compared its mapping with that provided by the Landscape Boards and, in most cases, finds that the condition class assessments applied by EBS/Umwelt are conservative in comparison. As previously stated, Umwelt utilised all available information, including multiple seasons of surveys, and applied the precautionary approach to ensure conservative outcomes. Given the survey methodology and guidance in the Recovery Plan and EPBC Act Policy Statement 3.7, the surveys undertaken by Umwelt follow valid and correct processes as described in Section 3.1.2.3 of the Preliminary Documentation. With regard to limitations, variation between surveyors is a standard consideration in vegetation surveys. Multiple surveyors were utilised across the various surveys, and this does not reduce the confidence of the condition class assessment. The precautionary approach and use of multiple data sources further mitigate any potential variability.	No change required to PD	Not applicable.
		INTG condition assessments	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 3 DEW recommends Neoen contact DEW to arrange access to the complete data that DEW has access to	We believe this data is the same as that previously received from the Landscape Boards, and a comparison between our dataset and this data was presented to DCCEEW. Broadly speaking, the data used in the Preliminary Documentation is more conservative than the DEW dataset. Umwelt is happy to review any additional data provided by DEW; however, given the advanced stage of the approval process and the targeted, project-specific surveys already undertaken by Umwelt within the project area, it is unlikely that additional data would be incorporated into the assessment process.	No change required to PD	Not applicable.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		Plains Wanderer	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 4 Table 4.1 of PD **EPBC Critically Endangered Plains-wanderer (*Pedionomus torquatus*)** Table 4.1 identifies that it is unlikely that the EPBC Critically Endangered Plains-wanderer would occur in the PA. DEW advises that Mokota CP is a site that is part of the Plains-wanderer partnership between BirdLife Australia, Bush Heritage and the South Australian Arid Lands Landscape Board which is funded by the Saving Native Species grant under the Federal Natural Heritage Trust program which aims to update and revise data on the current distribution of species across SA. Two song meters are installed in the Mokota CP aiming to establish the EPBC listed species presence in remote areas of its former range. There are historical and ancdotal records of the presence of this species in Hallet, Nackara, Nantawarra and Willowie. First round of data will be retrieved from the song meters in the near future and will be analysed by the Project team. If the species is detected by the Mokota CP song meters, the species should be reconsidered for its potential to occur in the GNWF Project Area. DEW can connect Neoen with the Project team.	Neoen acknowledges that the Australian Government's PMST reports that the species or species habitat may occur across the GWNF Project Area (WF and OTL). Neoen confirms the likelihood assessment for the species was undertaken by taking into consideration whether potentially suitable habitat occurs within the GNWF, combined with a search of known BDBSA and/or ALA records (this included any and all known records, historical and recent, noting few BDBSA records exist for the species in South Australia at all, and thus relying upon potentially unverified ALA records), and that there have previously been a number of regional annecdotal sightings, however, these have not been confirmed by DEW or made publicly available. Neoen note that the Plains Wanderer may be considered a rare and elusive species (DotE 2015), however, despite extensive ecological surveys and search effort across a number of years and seasons (see Preliminary Document Table 2.2 and Table 3.1), the species has not been identified within or near the GNWF Project Area (Umwelt 2025). Survey effort specific to the current GNWF Project Area includes eight seasonal BBUS, which were undertaken across the Project Area, in line with DCCEEW's DRAFT onshore windfarm guidance (DCCEEW, 2023). The Plains Wanderer was not identified during any of these surveys or considered to be likely to occur. As such, Plains Wanderer was not considered to be an at risk EPBC listed species. Umwelt acknowledges that surveys to date have not been targeted to this species (i.e. nocturnal transect surveys), and thus detection would be limited to flushing Plains Wanderer from suitable habitat during the course of other daytime surveys. While the conservation significance of this species is recognised, the available evidence does not indicate its continued occupation within the Mid-North region. In light of the very low likelihood of occurrence, and consistent with standard survey practice, targeted surveys were not undertaken. Resources were instead directed toward species with a higher probability of presence, ensuring that survey effort was proportionate and scientifically justified. Neoen note that a number of pest species listed under the NPW Act have been recorded across the GNWF, and that the presence of species such as feral cats, rabbits and foxes can be detrimental to the landscape and grassland habitat being conducive to Plains Wanderer habitat (DotE 2015). Grazing by sheep, cattle, rabbits and kangaroos is cited in the Action Plan for Australian Birds 2020 (Garnett and Baker 2020), and is currently considered as having the greatest influence on the species. Further, Neoen notes that the closest known Plains Wanderer records include three records near Eudunda more than 5 km south of the OTL (ALA 2025, one record from 1931 and two undated records), and one record near Redhill (ALA 2025, undated record) more than 60 km west of the western boundary of the GNWF Project Area. Garnett and Baker 2020 cite that the species was once widespread in south-eastern Australia, however, records in the last decade have been restricted to north-central and central victoria, north-eastern South Australia, and the Riverina of southern New South Wales and west-central Queensland. Within South Australia, it is reported seven birds were detected on Boolcoomatta Station Reserve (over 200 km north-east of the GNWF northern boundary) in 2017, but few since (Bush Heritage Australia cited in Garnett and Baker 2020). Additionally, it is noted that further information regarding the potential presence of the Plains Wanderer in or near the GNWF Project Area was not the subject of DCCEEW's RFI (dated 5 December 2024), nor updated RFI (dated 26 September 2025). Neoen is interested to receive information from DEW regarding the song meters that are currently passiveley surveying Mokota CP, and notes it may have been advantageous to swap the meters over with replacement ones, and analyse the current data prior to the submission of Neoen's PD so that any potential records could have been included in the likelihood assessment.	No change required to PD	Not applicable.
		FRWL	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 5 S 4.4, Pg 133-140, Table 3.1, FRWL Assmt Rpt **Flinders Ranges Worm Lizard (FRWL) Survey Methods** DEW pleased to see multuple observations of FRWL across GNWF were made, even though surveys occurred in Autumn which is outside optimal survey time. DEW notes that whilst surveys captured multiple observations, it is not recommended that these surveys alone be used to assist micro siting infrastructure to avoid impacting FRWL. The main concern is that current surveys may not accurately reflect the population within the PA and further surveys carried out during optimal conditions may identify additional individuals in other locations across GNWF. DEW also advises that recent survey work has found that surveys carried out in Winter, immediately following heavy rainfall is a more optimal time for surveying for the FRWL and recommends Neoen contact DEW to obtain these details to assist in future surveys.	Neoen notes that the Conservation Advice for the species includes a range of vegetation associations (DEWHA 2008), and includes a number of vegetation associations found within the GNWF Project Area (Umwelt 2025 Eco Report, Umwelt 2025 FRWL targeted survey). Vegetation mapping undertaken by Umwelt (Umwelt 2025) indicates there is a total of 13,631.84 ha of potentially suitable habitat in the GNWF Project Area, of which approximatley 3,152.81 ha of potentially suitable habitat occurs within the Development Envelope, and a maximum of 412.4 ha is inside the GNWF Project Disturbance Footprint and potentially impacted by the Project (Umwelt 2025). Refined habitat mapping including a rocky surface layer estimates actual impacts from the GNWF are approximaltey 153.10 ha (or 4.86%) of the GNWF Project Area. This area includes both Permanent Disturbance and Temporary Disturbance, the latter which Neoen has considered as permanent disturbance to this species, in considering the species is an entirely ground dwelling species, and thus any Temporary Disturbance has been assessed as likely to result in a loss of or disturbance to the rocky surface layer and would be considered a permanent impact (or long-term impact) to this species. Neoen notes that impacts to this species are principally associated with VA11 (11a and 11b) Mixed *Austrostipa* spp. and *Rytidosperma* spp. Grassland. The species is considered to be reasonably common, but knowledge regarding the species ecology and home range is considered to be limited due to their cryptic nature and small size (Chapple et al. 2019; DEH 2008), as such, it is likely the species is more abundant / widespread than current records suggest. Neoen notes the recent study by Woinarski et al. (2023) suggests that the Flinders Ranges Worm-lizard population is now considered stable, and the species no longer meets eligibility criteria for a threatened listing, noting recovery efforts for have been successful in part due to reservation and curbing the rate of habitat loss within its limited range. Despite this, Neoen acknowledges that the FRWL may be considered to be a relatively cryptic and difficult species to survey. It is noted that the FRWL targeted survey was undertaken during the months of March/April, which is noted as being aligned with the requirements described in the Survey guidelines for Australia's threatened reptiles (Australian Government 2011), with some minor variations noted. It is recognised that DEW's recent survey work regarding optimal survey timing being during winter, following heavy rainfall events, was not disseminated / publicly available at the time of survey undertaken by Umwelt. Section 7.4.1, Table 7.21 of the PD notes that individual FRWL which are opportunistically detected within the Disturbance Footprint during pre-clearance surveys will be relocated to adjacent areas of suitable habitat by qualified fauna spotter catcher, prior to ground clearing activities.	No change required to PD	Not applicable.
		Cumulative impacts - INTG	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 6 S 4.3.6, Pg 125, Table 4.6 **Cumulative Impact on MNES** INTG TEC DEW notes the concerns over cumulative impact on INTG TEC which is undersood to be addressed through the assessment of this project and consideration of Neoen's application made to DCCEEW and the NVC	Potential cumulative impacts to INTG, including impacts arising from other projects in the region, were captured and assessed based upon publicly available information accessed via the EPBC Act Public Portal, which includes all referrals that listed impacts or potential impacts to MNES, including INTG, as outlined in Section 5 of the PD, and specifically for INTG, in Section 5.4.1.1. It is expectd that any and all projects which impact INTG should be referred, thus Neoen believes the cumulative impact assessment captures the pertinent data re cumulative impacts.	No change to PD required	Not applicable
		Cumulative impacts - PBTL	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 6 S 4.3.6, Pg 125, Table 4.6 PBTL Table 4.6 of the PD states an estimated total or average population of PBTL on GNWF is ~6519.04 individuals with an estimated number of PBTL in the Disturbance Footprint of 191.75 – 273.78 individuals (Table 4.7). This represents high number of PBTL that will either suffer from mortalities or eviction from their habitat as a result of the proposed wind farm. DEW notes the concerns over cumulative impacts on PBTL which is understood to be addressed through the assessment of this project and consideration of Neoen's applications made to the DCCEEW and the NVC.	The estimates provided in Tables 4.6 and 4.7 of the Preliminary Documentation reflect a precautionary approach informed by extensive survey effort. The relatively high population estimate is, in part, due to the significant amount of survey effort undertaken at this site, and likely high population numbers as a result of optimal preceding conditions, ensuring a robust dataset for assessment. The population estimate methodology has been discussed and reviewed by the PBTL Recovery Team, who agree with the approach applied and concur that it is likely to be a conservative estimate. Cumulative impacts have been assessed in the Preliminary Documentation (Section 5.4), and specifically for PBTL in Section 5.4.1.3, where other EPBC referrals impacting PBTL have been reviewed. To our knowledge, survey effort at GNWF for PBTL has been more extensive than any other current or historical referral, and the habitat assessment applied islikely to be conservative when compared to other applications. Neoen has commited to Pre-clearance surveys and relocation of PBTL detected within the Disturbance Footprint. Although the survivorship of relocated PBTL has not yet be verified, it is likely that at least a portion of the relocated lizards survive, representing a reduction in the actual impact to PBTL. The use of relocation as a mitigation measure is also likely to be incorporated into a mitigations focused research project as part of the GNWF EPBC Offset Package compensatory measures. The entire assessment, including the Preliminary Documentation and all supporting studies, has been undertaken with regular consultation with DCCEEW. Offsets are proposed for residual impacts in accordance with the EPBC Act Offsets Policy and guidance, and these will be subject to approval by DCCEEW.	No change to PD required	Not applicable.
		Southern Whiteface	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 6 S 4.3.6, Pg 125 Southern Whiteface Section identifies that up to 263 Southern Whiteface individuals were observed in the PA across 47 observations which may be higher given the inclusion of the SWF under the EPBC Act in March 2023, although could include repeat observations of the same individuals over different survey periods. It is noted the SWF likely nest in the Project Area or nearby and targeted surveys have not been undertaken in the OTL areas although individuals have been recorded in the OTL areas with suitable habitat present (Figure 4.9 of the PD). The Project also proposes to establish a high voltage OTL of 275 kV or 333 kV between GNWF and Bundey Substation (48 km in length). SWF is a species that has regularly been identified as being impacted in other developments in this region, including Goyder South (in construction and operation), Twin Creek (not yet constructed, in approvals phase) and Whyte Yarcowie (not yet constructed, in approvals phase). DEW recommends that cumulative impacts on SWF should be considered as part of the project assessment.	A cumulative impact assessment was undertaken for the GNWF, using an extensive array of public documentation that was available via DCCEEW's EPBC Act Public Portal at the time of preparation of the PD. As such, cumulative impacts are provided in Section 5.4, Table 5.7 and Section 5.4.1.5 of the PD for all MNES identified as relevant to the GNWF as outlined in DCCEEW's RFI, inclusive of those MNES which were impacted or potentially impacted by other EPBC referred project's within a 50 km buffer, and within a 50 km buffer plus the known area of occupancy for PBTL. EPBC referred Project's included within the cumulative impact assessment included the Morgan Whyalla Pipeline Stage 1 (up to 33.12 ha of SWF habitat); Solar River Project (up to 34.78 ha of SWF habitat); the GNWF Project as described herein (up to approximately 57.97 ha of SWF habitat, however, significant impacts were not expected for this species due to the construction and operation of the GNWF); the Whyte Yarcowie WF (up to 139.61 ha of SWF habitat); and Razorback Iron Ore Project (up to 1,484.8 ha). For the GNWF and Razorback Iron Ore Project, these areas of impact include all areas of potential habitat (inclusive of, but not limited to critical habitat) where impacts were not considered to have a significant residual impact according to the impact assessments undertaken for these projects. Nonetheless, potential impacts of these two projects have been included here as potentially part of the cumulative impact from multiple projects. Section 5.4.1.4 of the PD states: "For Southern Whiteface, cumulative impacts are likely to result in the disturbance or clearance of approximately 1,750.28 ha for all known projects that occur either wholly or partially within a 50 km buffer of the GNWF, with the GNWF expected to contribute 57.97 ha or 3.31% of the cumulative clearance of potential habitat for this species (noting that the species was not considered by earlier projects which were assessed prior to its listing under the EPBC Act in 2023). The species entire AOO is estimated to be 70,000 km^2 / 7,000,000 ha across an EOO of 4,190,000 km^2 / 419,000,000 ha (DCCEEW 2023a). The AOO estimate for the south-east subspecies is 60,000 km2 / 6,000,000 ha within an EOO 3,800,000 km2 / of 380,000,000 ha (Garnett and Baker 2021). From a bioregional perspective the Flinders Lofty Block IBRA Bioregion AOO is 4,400 km2 / 440,000 ha (within an EOO of 116,885 km^2 / 11,688,500 ha), and the Murray Darling Depression IBRA Subregion AOO is 5,168 km2 / 516,800 ha (within an EOO of 75,089 km^2 / 7,508,900 ha) (as calculated within ALA spatial portal using IBRA shapefile import, 0.02 degree grid (ALA 2025). As such, the clearance of approximately 1,750.28 ha of potentially suitable habitat for all known projects within a 50 km radius of the GNWF represents approximately 0.025% of the reported Area of Occupancy of the species broadly across Australia. Further, within the Flinders Lofty Block and Murray Darling Depression the species' AOO is estimated to be 440,000 ha and 516,800 ha (ALA 2025), representing a maximum of 0.40% and 0.34% respectively. For SWF, while the species is largely understood to be relatively sedentary and remain within a somewhat limited home range throughout the year, it should be noted that this species has broad habitat requirements. This species is not expected to be significantly impacted by the GNWF (as reflected by the significant impacts assessment against the Significant Impact Guidelines 1.1 (DotE 2013a) in Section 7.3.3), or by cumulative impacts from the projects considered here."	No change to PD required	Not applicable.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		PBTL relocation/translocation	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 7 Table 7.9 Pg 353 - 356 **Offsets for MNES: PBTL (and INTG)** <u>Relocation and translocation methods</u> Table 7.9 identifies two options of uncertain effectiveness to offset impacts to PBTL. Firstly relocating to another area away from the construction footprint, the effectiveness of which is unknown, as the survivorship of individuals was not ascertained during occasions when this was implemented in the past. Secondly translocation, which is the other alternative method highlighted for larger populations of PBTL. Whilst it states the first two years of the Worlds End translocation has demonstrated short term success with evidence of breeding, this trial has not released translocated individuals into the wild as yet, with the barrier of the PBTL enclosure still in place. It is generally considered that translocation projects can only be considered successful when individuals are fully released into the wild and they become a self-sustaining population. DEW has concerns over relying on outcomes of this translocation given it has not yet been demonstrated as a success.	A PBTL Management Plan (which has been reviewed by DCCEEW) outlines procedures to assess potential relocation sites and maximise chance of survivorship, based on available literature on translocations of PBTL. Procedures prior to any relocation of PBTL, includes: - Conducting surveys at any proposed relocation sites in advance to evaluate the current population density and location of resident PBTL at the proposed relocation site and the resource availability (availability of suitable burrows). - Conducting relocations at favourable times based on PBTL ecology, especially during autumn and spring, where practicable. - Preparing a relocation site to increase suitability by: orecording micro-habitat details of PBTL to be relocated (i.e. proximity to grass tussock, aspect, depth of burrow) oinstalling artificial burrows to replicated micro-habitat conditions of PBTL to be relocated (Michael et al. 2024) oensuring adequate resource partitioning (>1m between lizards) to avoid competition with resident PBTL (Ebrahimi and Bull 2014b) opreparing and installing soft-release enclosures to limit dispersal of relocated individuals in the first 1 to 2 days following relocation (Ebrahimi and Bull 2013) oemploying soft release methods such as provision of supplementary food immediately following relocation. The proposed mitigation measures to relocate or translocate individuals is a means to reduce impacts to PBTL as far as reasonably practicable. This mitigation measure has not resulted in a reduction in the overall area of PBTL impacted, or any reduction in the PBTL offset requirements, on the basis that there remains uncertainty about the outcome. i.e. a conservative approach has been taken, whilst still attemnpting to reduce impacts wherever possible. Research objectives, as part of the PBTL offset package, for the GNWF focus on assessing the effectiveness of mitigation measures, including a study into the effectiveness of PBTL relocations. These objectives are outlined in the PBTL Offset Management Plan(s) which are now available in draft for review by DCCEEW (but were not available at the time of the public comment)	Yes	Draft PBTL Offset Management Plans (x2) are now available as Attachment 19 and 20 of the PD which outline details for each of proposed on-ground offset properties. The Offset MPs for PBTL include the overarching PBTL Offset proposal which includes Other Compensatory Measurse as approximatley 15% of the overall offset package. The research objectives are briefly outlined and are focused on better understanding translocation/relation success. Section 9.4 of the PD has also been revised regarding the PBTL offset approach (updating the high level Strategy which was previously provided) and summarises the research objectives in Section 9.4.5 of the Other Compensatory Measures component of the offset package which includes a focus on better understanding translocation and relocation success.
		PBTL relocation/translocation	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 7 Table 7.9 Pg 353 - 356 <u>Translocation</u> If deemed a translocation process is most appropriate, DEW recommends the DCCEEW and IUCN Guidelines be followed including exit strategies. DEW notes construction time pressures and permanent alteration of environment may be in conflict with Guidelines, i.e. implementing an exit strategy with minimal ability to return the lizards or find alternative habitat if the process is not achieving necessary milestones. It is also noted that identifying a suitable translocation site is limited given competition for land in the region, challenges for new developments, conservation and offset sites in area has limited suitable habitat remaining.	The PBTL Management Plan (reviewed by DCCEW) outlines procedures to assess potential relocation sites prior to any relocation of PBTL. These management plans have been reviewed by DCCEEW, and revisions are currently being made to ensure alignment with regulatory requirements and best practice. We reiterate that offsets are proposed for the entire residual impacts to PBTL, and relocation/translocation measures are considered additional mitigation and are not included in offset calculations. Neoen has already secured an offset site to fulfill a portion of its Significant Environmental Benefit (SEB) obligations under the Native Vegetation Act. This site, located approximately 10 km north of the GNWF Project Area, contains up to 300 ha of potentially suitable habitat for PBTL, including Lomandra grasslands, Austrostipa spp. grasslands, and historically cropped land (>20 years) that has regenerated as Austrostipa sp. grassland. While surveys have not yet detected PBTL at this site, suitable habitat indicators—including wolf spiders and trapdoor spiders—were recorded. This site has been considered by the PBTL Recovery Team and DCCEEW as a potentially suitable translocation site. Additionally, Neoen is in the process of securing land for the EPBC offset for MNES (PBTL and INTG). This includes a nearby property, [redacted], which adjoins the northwestern boundary of the GNWF Project Area and provides up to 524.73 of suitable habitat for PBTL. Low numbers of PBTL have been recorded at [redacted], and the site has potential to host a translocated population if determined to be the best course of action by DCCEEW and/or the PBTL Recovery Team. Any translocation process will follow the principles outlined in the DCCEEW translocation approval framework and the IUCN Guidelines for Reintroductions and Other Conservation Translocations. This includes: -Developing clear goals and objectives for translocation. -Undertaking feasibility and risk assessments (biological, social, and regulatory). -Designing and implementing a robust monitoring program. -Establishing an exit strategy to address scenarios where translocation does not achieve milestones, including contingency plans for alternative management or integration into conservation breeding programs. -Ensuring ethical standards, genetic diversity retention, and animal welfare considerations are met throughout the process.	Yes	Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to address DCCEEW comments on the draft version, and to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program, and further details to manage the risk of poaching. Draft PBTL Offset Management Plans (x2) are now available as Attachment 19 and 20 of the PD which outline details for each of proposed on-ground offset properties. The Offset MPs for PBTL include the overarching PBTL Offset proposal which includes Other Compensatory Measurse as approximatley 15% of the overall offset package. The research objectives are briefly outlined and are focused on better understanding translocation/relation success. Section 9.4 of the PD has also been revised regarding the PBTL offset approach (updating the high level Strategy which was previously provided) and summarises the research objectives in Section 9.4.5 of the Other Compensatory Measures component of the offset package which includes a focus on better understanding translocation and relocation success.
		PBTL relocation/translocation	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 7 Table 7.9 Pg 353 - 356 <u>Co-siting offsets</u> Table 7.9 refers to the translocation of PBTL onto Worlds End as a positive outcome. Whilst there is a potential positive outcome for PBTL, this has resulted in the active reduction of another EPBC Endangered species, Acacia spilleriana (Spiller's Wattle), the regeneration of which will now be restricted to allow suitable PBTL habitat. This example shows that co-siting of offsets may cause negative outcomes for some other species and ongoing management regimes that the landowner must maintain (including killing woody native flora indigenous to the site in favour of siting the PBTL offset).	Relocation of PBTL into Worlds End was undertaken as part of the GSWF Project, and is not part of the GNWF Project. Statement acknowledged regarding impacts in receiving sites. The PBTL MP outlines processes for assessing the relocation/translocation sites prior to receiving any relocated individuals. The Draft PBTL Management Plan has been reviewed by DCCEEW. Any translocation process will follow the principles outlined in the DCCEEW translocation approval framework and the IUCN Guidelines for Reintroductions and Other Conservation Translocations. This includes: -Developing clear goals and objectives for translocation. -Undertaking feasibility and risk assessments (biological, social, and regulatory). -Designing and implementing a robust monitoring program. -Establishing an exit strategy to address scenarios where translocation does not achieve milestones, including contingency plans for alternative management or integration into conservation breeding programs. -Ensuring ethical standards, genetic diversity retention, and animal welfare considerations are met throughout the process.	Yes	Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to address DCCEEW comments on the draft version, and to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program, and further details to manage the risk of poaching.
		PBTL relocation/translocation	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 7 Table 7.9 Pg 353 - 356 <u>Long term viability of translocated PBTL</u> It's noted Neoen have invested considerable funds on PBTL, yet in terms of long term viability translocation, a key aspect of IUCN Translocation Guidelines is to consider the impacts on the destination ecosystems of translocating a species to a new site. For Worlds End PBTL translocation project as an exmple, the PBTL only occurs in very low numbers on the western side of Worlds End, as specified in the Worlds End documentation (Managment Plan), likely due to the rocky substrate and subsequent lack of spider burrowns, in this area is naturally relatively unsuitable for PBTL. Long term viability of the translocated PBTL population to Worlds End will depend upon a constant investment to maintain suitable habitat (removing native woody plants, including those which are endangered) and installation and managment of artificial burrows which is expected to be resource intensive. DEW recommends that the progression of a translocation project is best to be carried out over a time frame that will afford the necessary consideration to the translocated species, both source and translocated populations, as well as the destination ecosystem and all of its elements individually and as a whole. The consideration of the land manager and their capacity to sustain the management obligations to enable translocated populations to survive, effectively in perpetuity should also be thoroughly considered.	Relocation of PBTL into Worlds End was undertaken as part of the GSWF Project, and is not part of the GNWF Project. Statement acknowledged regarding impacts in receiving sites. The PBTL MP outlines processes for assessing the relocation/translocation sites prior to receiving any relocated individuals. The Draft PBTL Management Plan has been reviewed by DCCEEW. Any translocation process will follow the principles outlined in the DCCEEW translocation approval framework and the IUCN Guidelines for Reintroductions and Other Conservation Translocations. This includes: -Developing clear goals and objectives for translocation. -Undertaking feasibility and risk assessments (biological, social, and regulatory). -Designing and implementing a robust monitoring program. -Establishing an exit strategy to address scenarios where translocation does not achieve milestones, including contingency plans for alternative management or integration into conservation breeding programs. -Ensuring ethical standards, genetic diversity retention, and animal welfare considerations are met throughout the process.	No change to PD required	Not applicable.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		State Matter - SEB Offset	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 7 Table 7.9 Pg 353 - 356 SEB offset Based on earlier documentation for NVC approval for the SEB Offset, the project appeared to have found a minimalistic SEB Offset site for Stage 1 - which does not contain PBTL habitat with minimal area for Lomandra grassland.  The current PD states that Neoen have found an offset for GNWF (1,300 ha) and the effectiveness of the property is high in providing offsets for PBTL and Lomandra grassland. DEW notes that NVC have reviewed the offset managment plan and ensorse as part offset for Stage 1 of the clearance approval.	Native Vegetation clearance approval for Stage 1 has been granted, and the on-ground SEB for Stage 1 native vegetation offsets has been approved by the NVC. Contrary to the comment, the approved SEB site contains 44 ha of INTG as defined in the Conservation Advice, along with extensive areas containing Lomandra tussocks as understorey. These areas are connected to patches mapped as INTG (including Class A) in the Murraylands and Riverland Landscape Board mapping, including areas within a Heritage Agreement and to the southeast. The SEB property provides up to 300 ha of potentially suitable habitat for PBTL, including grasslands, Lomandra, and historically cropped land (>20 years since last cropping) that has regenerated as Austrostipa grassland. The SEB will be managed to improve outcomes for INTG and PBTL and may be considered as a site for translocation of PBTL if deemed appropriate by the PBTL Recovery Team and DCCEEW. At the time of public comment, only a high-level offset strategy was available for MNES. Draft INTG and PBTL Offset Management Plans are now available for review by DCCEEW, outlining specific on-ground and other compensatory measures proposed to offset residual impacts to MNES. The Preliminary Documentation has been updated to reflect this advancement in position regarding EPBC offsets. Across the proposed Stage 1 and Stage 2 EPBC offsets for PBTL, together with the SEB area, approximately 1,100 hectares are considered suitable habitat for PBTL. In addition, the EPBC offsets for INTG, combined with the Stage 1 SEB offset, provide around 132 hectares of Lomandra grassland	Yes	Draft Offset Management Plans (x3) are now available as Attachment 19, 20 and 21 of the PD which outline details for each of proposed on-ground offset properties, as well as other compensatory measures (research) for PBTL which is focused on better understanding the effectivenss of mitigation measures (translocation/relocation and trail road crossings).
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 **Ecological Asset: Mokota Conservation Park (CP)** - MNES present: Flinders Ranges Worm Lizard (FRWL), Trailing Hop-bush (THB), Iron-grass Natural Temperate Grassland of South Australia (INTG). Table ES 1: Key elements of Neoen's application of the mitigation hierarchy - statement "Avoidance of all conservation areas, including Mokota Conservation Park and Tiliqua Nature Reserve, including August 2025 refinements that achieved a 450 m setback for WTG tower centres." P. ES-8 of the PD.	No response required - statement / section heading. Neoen acknowledges DEW's statement of Mokota CP's historical information and ecological values.	No change to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 DEW has concerns regarding the potential impact of the GNWF on Mokota CP. Below are details of the ecological values and concerns: **Mokota CP's historical information and ecological values:** [... listed in bullet form (6 bullet points) in Enclosure 1...]. Section 4.12.6 (pg 196) of the PD states Mokota CP is within the Development Envelope of the GNWF. Section 3.3.4 (pg 68) of the PD states "No protected areas are proposed to be impacted by the Project [...] **Concerns for Mokota CP:** Proposal DEW has some concerns over the following potential impacts to the Mokota CP and limited assessment of potential impact in some cases: 1. only direct impacts of clearance within a Disturbance Footprint seem to be shown as being assessed	Whilst the Development Envelope appears to overlap with Mokota CP, this is due to issues with georectification whereby the publicly available spatial data does not line up with the true parcel boundaries. Neoen engaged a surveyor to confirm the boundary of Mokota CP and the road reserve, using this data to ensure that the Disturbance Footprint does not impact this area, and that Mokota CP has been specifically excluded from the Project design and any direct impacts resulting from the Project. Section 6.1.2 Construction Exclusion Zones and WTG Setbacks and Table 6.1 Constraints Register - Construction Exclusion Zones and WTG Setbacks lists all nearby areas which have been excluded, including Mokota CP. It is expected there is limited opportunity for any potential indirect impacts, however, where identified, these will be mitigated for or managed in accordance with the CEMP and OEMP (e.g. potential impact of dust, edge effects). The potential indirect impacts of shadow flicker from the movement of WTG turbine blades has been assessed in Section 7.1.2.2 Impact of Shadow Flicker from WTGs on PBTLs, which although was undertaken specifically in regards to potential impacts to PBTLs, has also assessed potential impacts on Tiliqua Nature Reserve and Mokota CP. Further, Table 7.8: Area and duration of shadow flicker within conservation areas in or adjacent to GNWF outlines potential indirect impacts to Mokota CP, noting WTG 011 has been further setback since the assessment was undertaken and thus potential impacts are expected to be less than that stated in the PD.	Yes	Conservation areas (Mokota CP, Tiliqua Nature Reserve, Mongolurring Nature Reserve added to Figure 2.2. Summary at the top of Section 4.12.6 of the PD updated to clearly state Mokota CP is excluded from any direct impacts from the Project.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 2. GNWF proposal almost envelopes Mokota CP, with access roads to the windfarm running north and south of Mokota CP, and within the windfarm proposed for the eastern boundary	Statement only. Noted.	No change to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 3. significant concern for the proposal if ~90% of traffic from the WF directed along the southern boundary of Mokota CP	Neoen confirms that the road/track on the southern boundary of Mokota CP will be utilised as the main access road for the Project, noting that the vast majority of traffic movements will occur during the construction phase of the Project, which is considered to be relatively short-term and is currently expected to occur for approximately 2-3 years depending on how construction is staged. Once constructed, vehicular traffic will reduce significantly within the GNWF, with the tracks accessed during the operational phase for monitoring and maintenance activities. The Full-Time Employees (FTEs) expected during the operational phase will be significantly lower than during construction, spanning approximately 30 years as outlined in Section 3.4 of the Project Description (Attachment 1 to the PD). The table provides indicative lower and upper estimates for Stage 1 and combined Stage 1 and 2 project scenarios. This includes operational staff required for both the wind farm, OTL and substations. Numbers in the table represent annual averages, noting that there may be occasional short-term increases during planned activities such as scheduled high-voltage outages and retrofit works. From time to time, major component replacements may also be required; these are managed promptly and safely with minimal disruption. Most operational work will occur on weekdays. Under the combined GN stage 1 and 2 scenarios (with maximum vehicle numbers) there are estimated to be between 7 and 10 vehicle movements per day noting that this applies to the entire project area including substation and OTL and is therefore not just proposed at the windfarm site. i.e. not a significant increase from the likely current numbers. If only Stage 1 proceeds, then estimates are for between 5 and 7 movements per day during operation across the entire project. The CEMP and OEMP provide a range of environmental mitigation and management measures, including measures focused on managing potential stormwater runoff, dust suppression, weed assessments and controls, etc. A review of monthly wind rose charts available through the Bureau of Meteorology (BoM), based on 9 am and 3 pm wind data from Clare High School (the nearest BoM weather station), indicates that wind direction during the warmer and dryer months of the year (November to March) tend to predominantly be of a northerly wind direction (including north-east and north-west) (BoM 2025). Any potential dust which may occur during the construction phase is expected to be mitigated for as outlined in the CEMP and OEMP, however, based on this wind data, it may be assumed that wind direction may assist in further mitigating dust exposure to Mokota CP.	No changes to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 4. there appears to be approximately 8 WTG surrounding the Mokota CP	Statement only. Noted. Neoen has ensured a blanket exclusion zone and WTG setback of 450 m from boundary of Mokota, with the closest WTG (WTG 011) sited 470 m from Mokota CP.	No changes to PD required	Not applicable.

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		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 5. spacing of proposed WTGs and WF roads is such that the gap provided between the rows of turbines by the Mokota CP does not appear overly different to the gap between rows of turbines elsewhere in the disturbance footprint	Statement only. Noted. Construction Exclusion Zones and WTB Setbacks are presented in Section 6.1.2, and Table 6.1 Constraints Register - Construction Exclusion zones and WTG Setbacks of PD (pages 294 and 295). Broadly, the WF design layout is based on topography and wind modelling, with certain distances required between WTGs to enable effective functioning and no loss in generation potential as a result of turbulance from adjacent turbines. The gap between Mokota CP and the nearest turbines may be similar to the gap between other rows of turbines, but there are no turbines along the boundary of Mokota CP when wind modelling and interaction between turbines would enable this.	No changes to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 6. Potential impacts from road development and widening, transportation of equipment and changes to hydrology on vegetation and fences	As outlined previously above, Neoen confirms that the road/track on the southern boundary of Mokota CP will be utilised as the main access road for the Project, noting most traffic movements will occur during the construction phase of the Project, which is considered short-term and is currently expected to occur for approximately 2-3 years. Once constructed, vehicular traffic will reduce significantly within the GNWF, with the tracks accessed during the operational phase for monitoring and maintenance activities, as outlined above. Neoen acknowledges the importance of the Mokota CP and is committed ensuring any potential direct or indirect impacts to Mokota CP, as a result of the GNWF, are well managed and mitigated. Advisory Note 6 cited in the Plan SA decision notification for the Project states "The applicant/owner/operator is reminded of the general environmental duty, as required by section 25 of the Environment Protection Act 1993, to take all reasonable and practicable measures to ensure that activities on the site and associated with the site (including during construction) do not pollute the environment in a way which causes or may cause environmental harm" and Advisory Note 9 which states "Advisory Note 9 In addition to the above, the proponent should also be prepared to provide the EPA with any further documentation that may reasonably be required to demonstrate the adequacy of the site's environmental controls". As such, a thorough risk assessment has been undertaken, which included provisions for potential impacts associated with road development and road widening activities (e.g. clearance activities), transportation of equipment, and potential changes to hydrology. The risk assessment was undertaken during the preparation of the CEMP, which included identification of risks, and risk(s) to the implementation of the CEMP. As such, the CEMP (and OEMP) address a range of construction management measures and subplans. Specifically, subplans which are be relevant to the protection of Mokota CP (and other nearby conservation areas) include: - Dust (air quality) Management Plan (MP), - Fire and Emergency Response Plan, - Flora and Fauna MP, - INTG TEC MP, - Noise and Vibration MP, - OEMP, - Soil Erosion and Drainage MP, - Waste MP, - Rehabilitation MP. One of the objectives of the CEMP is to ensure that environmental monitoring, reporting and review occurs to manage environmental components of the construction, and allows for adaptive management (i.e. corrective and preventative actions) and continual improvement of the CEMP. This is considered a vital aspect of the success of the implementation of the CEMP, so that should additional management strategies be required, the CEMP has the scope to address these. Neoen is committed to ongoing communication with a key contact from DEW/NYLB/MRLB to assist with identifying any on-ground issues during the construction phase, to enable early resolution of potential impacts to Mokota CP. Neoen also proposes to proactively meet with DEW / Landscape Board to share relevant management plans such as the CEMP and ensure all parties are satisfied with the proposed approach and triggers. Note that in the Executive Summary of the Draft CEMP, it states that Neoen will "ensure that environmental monitoring, reporting and review occurs to manage environmental components of the construction and allows for adaptive management and continual improvement of this CEMP" to fulfill the objectives of the CEMP.	No changes to PD required	Not applicable.
		Mokota Conservation Park, Declared Weeds, WoNS	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 7. Potential increased weed contamination of the park from 14 Declared weeds found on Goyder North (S 3.3.7.5 of PD)	Neoen acknowledges that a total of 106 species of introduced flora (weeds) have been recorded throughout the Project Area during field surveys, as cited in Section 3.3.7.5 of the PD. This includes a total of 14 Declared Weeds under the Landsape South Australia Act, two of which are also Weeds of National Significance listed by the Commonwealth. Regarding weeds, the Construction Environmental Management Plan (CEMP) and INTG MP include a comprehensive weed management and monitoring program, regarding both the broader Project Area, and specifically, the areas of temporary INTG clearance proposed for rehabilitation. This involves a baseline survey of the Disturbance Footprint, followed by regular (three-monthly) on-ground audits of cleared areas within INTG to identify and map weed presence to inform control measures. This ensures that outbreaks are detected early and treated appropriately. All Declared weeds, including Horehound and Cutleaf Mignonette have previously been identified as priority concerns, however, if NYLB identify these specific species as significant threats, they will be specifically included in the INTG MP alongside other Declared weeds to ensure they are prioritised for control. DCCEEW have received the draft INTG Management Plan and have had the opportunity to review the mitigation measures which are proposed to avoid soil disturbance and weed incursion into areas of INTG. Concurrently, CEMP and OEMP measures will be in place throughout the Project's construction and operation phases. Neoen maintains its commitment to explore ways to enhance the values or contribute to the future preservation of Mokota CP, and will continue to engage with DEW and the NPPL team.	No changes to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 8. Potential Shadow Flicker Impact	Comment previously addressed above, which outlines exclusion of direct impacts, assessment for potential indirect impacts, and shadow flicker assessment. The broader context regarding the shadow flicker assessment in relation to the GNWF, is provided in Section 5.2.9 (indirect impacts), with the comprehensive assessment provided in Section 7.1.2.2 and Table 7.8 (specific to conservation areas in or adjacent to the GNWF) of the PD. In regards to potential indirect impacts of shadow flicker occurrence in Mokota CP, up to approximately 6.21 ha for the 'expected case' is modelled to potentially impact Mokota CP in the 101-250 hours per year category (i.e. a maximum of between 8.4 to 20.8 equivalent days), with a small area (of 0.37 ha) potentially impacting Mokota CP within the 251-500 hours per year category (i.e. 20.9 to 41.6 equivalent days per year). Whilst the assessment was principally undertaken to assess potential shadow flicker impacts to PBTL, the results of the assessment provide qualitative informative on the annual duration of potential shadow flicker impacts to Mokota CP. As shadow flicker would be largely constrained to between 8.4 to 20.8 equivalent days per year (based on a 12 hour day), it should be noted that these potential impacts would only occur for some months of the year, and typically for small portions of the day (e.g. predominantly limited to the morning around the time of sunrise). *However, it should be noted that WTG 011 was moved further back from Mokota CP just prior to submission of the PD, with a setback distance of 470 m (i.e. beyond the commited minimum 450 m setback distance). As such, potential impacts are expected to be less than that stated in the assessment in the PD, resulting in a reduction in shadow flicker influence on this reserve.*	No changes to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 9. Potential Bird Strike from the WT surrounding the park	A blanket exclusion zone, and WTG setback of 450 m from boundary of Mokota has been implemented for the GNWF, with the closest WTG (WTG 011) sited 470 m from Mokota CP. Construction Exclusion Zones and WTB Setbacks are presented in Section 6.1.2, Table 6.1, and Figure 6.1 of PD (pages 301 and 305). It is noted that relevant controlling provisions for the GNWF relate to listed threatened species and communities (sections 18 and 18A). The RFI (5 December 2024) required further information on the following avifauna (noting this was requested but not limited to): South-eastern Hooded Robin (Endangered), Blue-winged Parrot (Vulnerable), Southern Whiteface (Vulnerable), and Diamond Firetail (Vulnerable). Eight BBUS surveys were recently undertaken across a period of two years between Spring 2023 and Spring 2025, and in accordance with DCCEEW's Draft Onshore Wind Farm Guidance (2024).Results of the BBUS did not identify any MNES (avifauna or bat species) at risk based on flight heights, with the exception of the Fork-tailed Swift (Migratory), with one individual Fork-tailed Swift recorded at Site 12 as a flyover species. Non-MNES species are not considered under the EPBC Act, and thus are not considered within the PD. The Fork-tailed Swift is a nonbreeding visitor to Australia and is an almost exclusively aerial species. In South Australia, the species is present from October to May but is most common from December to March (DCCEEW 2025). This species may be considered to occur in low numbers in the aerial space above all habitats within the GNWF, however, these habitats are not considered to represent an important foraging area for this species. Whilst this species was not the subject of the RFI (5 December 2024) or Re-issued RFI (26 September 2025), Neoen has included an assessment for this species, which is provided in Section 7.7, and the SIA for the species is provided in Section 7.7.3 and Table 7.35, and Section 7.7.3.1 Acceptability of relevant impacts of the PD. Based on this assessment, no significant residual impacts are expected for the Fork-tailed Swift. Whilst painting one blade black to minise bird strike has been raised and considered by Neoen, the additional visual amenity impact concerns raised by the Burra community were considered to outweigh the potential benefits of this option.	No changes to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 10. Loss of Amenity from wind turbines surrounding the park	As described above/previously within this response document, visual amenity is not a MNES and is not covered under the EPBC Act referral and assessment process, and is therefore not a specific focus of the Preliminary Documentation and/or supporting reports. Visual amenity or visual impacts were not raised as a controlling provision or requested in the RFI (5 December 2024) or Re-issued RFI (26 September 2025) from DCCEEW. However, the visual impacts of the GNWF on the National Heritage listed Australian Cornish Mining Sites (Burra township) were considered in the EPBC referral for the GNWF, and were also were assessed through the State Development Application process. The referral was supported by visual modelling and assessment undertaken by Biosis (2024) which concluded that the National Heritage Listed township of Burra was approximately 2.7km from the Goyder Renewable Energy Facility at it's closest point. Views from the township of Burra are not cited in the National Heritage criteria, or the State Heritage statement of significance. and the Goyder North Project was determined to not have a significant impact on the Nationally-Listed Heritate site, as defined by the Significant Impact Guidelines 1.2. As no other World Heritage Properties, National Heritage Places, or Commonwealth Heritage Places were identified in the PMST, or in the RFI or Re-issues RFI, no further assessments regarding visual amenity have been required to be undertaken. Further, there is no specific South Australian legislation, policies or guidelines regarding the assessment of visual amenity, however, general provisions regarding visual amenity are incorporated in the State's statutory planning framework (such as ensuring appropriate setbacks from involved and non-involved dwellings). As such, further aspects of the Project's visual amenity were considered during the state planning assessment process, and subsequently approved by Plan SA on 3 October 2024 under the PDI Act 2016 (SA). Neoen have conducted on-going community engagement on a range of issues throughout the development of the GNWF Project, and will continue to engage with the community.	No changes to PD required	Not applicable.

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		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 <u>Road status:</u> DEW has concerns regarding impacts on conservation from the proposed road along the southern boundary of Mokota CP (as described above proposing 90% traffic to this road). It is noted there have been some discussions with DEW, Native Vegetation Branch in relation to potential impacts on clearance of native vegetation however no discussions have occured, as yet, with the National Park and Public Lands (NPPL) team.	This comment has been largely addressed in Row 79, the response to DEW's bullet point 6. Additionally, it should be noted that Plan SA set out a number of conditions (i.e. Condition 3 to Condition 11) in the Decision Notification Form regarding the construction, upgrade and maintenance of roads, including stormwater capture. Neoen engaged with National Parks and Wildlife Manager for the Yorke and Mid North region in 2024 regarding proposed infrastructure for GNWF and have been in communication more recently around Goyder South Wind Farm, including offsets. Neoen maintains its commitment to explore ways to enhance the values or contribute to the future preservation of Mokota CP, and will continue to engage with DEW and the NPPL team. Neoen acknowledge that further consultation is required with the NPPL regarding the matters raised, and are committed to further consultation at upcoming meetings currently scheduled and beyond.	No changes to PD required	Not applicable.
		Mokota Conservation Park	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 8 Table ES 1, Pg ES 8, S 4.12.6, Pg 196, S 3.3.4, Pg 68 <u>Consultation:</u> Given the GNWF proposal is anticipated to impact the Mokota CP, DEW NPPL seek further discussion, to work through matters raised above. See **ATTACHMENT A** for further details to potential impacts to Mokota CP (12.1 to 12.5).	Neoen have undertaken extensive community and stakeholder engagement for the project, throughout it's development and believe the State Government has had several opportunities to comment previously, specifically during the review and approval of both the Development Application and Native Vegetation Clearance Application process. For example, realignment of the access road that is proposed over the existing council road beyond the outer southern extent of the Mokotoa Conservation Park boundary was assessed and discounted given it would result in more direct impacts to Lomandra grasslands. Neoen consulted generally with the DEW National Parks and Public Lands team regarding proposed infrastructure for GNWF in 2024 and more recently in relation to Goyder South, however acknowledge that further consultation is required regarding Goyder North and their matters raised, and are committed to further consultation at upcoming meetings currently scheduled and beyond. Whilst ongoing feedback and discussions are welcome, the design process is well developed and power purchase agreements are already in place for Stage 1 of the development. Further discussions at this point will not alter the design. Attachment A raises State related issues which are not specifically relevant to the EPBC referral or assessment addressed in the PD and associated documents. We are unsure what the reference to 12.1 to 12.5 refers to, as commnets in Attachment A only go to comment 6 (in 3 of 3 pages). We have addressed each of the State related comments which were provided in Attachment A below.	No changes to PD required	Not applicable.
		Fragmentation - PBTL, FRWL, INTG	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 9 Table ES1: Alignment with existing infrastructure and cleared areas, thereby avoiding impacts to native vegetation and MNES habitat". <u>Current Statements (Table ES1):</u> The following two statements appear to not address the impact of fragmentation and increased traffic as a result of the proposed roads, on MNES (PBTL, INTG and FRWL): *"Alignment with existing infrastructure and cleared areas, thereby avoiding impacts to native vegetation and MNES habitat"* and *"More than 40 km of existing roads and access tracks have been utilized within WF and OTL. 6.76% of Disturbance Footprint (36.31 ha) occurs within existing cleared areas (such as existing roads), despite only ~1.19% of the GNWF Project Area comprising existing cleared areas."* Whilst DEW appreciates that Neoen have made efforts to minimise clearance by utilising existing tracks, this may in effect cause severe fragmentation and yet unknown consequences to the PBTL populations. Any new roads may create additional fragmentation, noting that the PBTL Recovery Team have identified concerns regarding PBTL ability to traverse wind farm roads (in general) as they are usually elevated, widened and are often bordered by large rocks and stones. Therefore, the likelihood of PBTL being able to cross the windfarm roads to access the wider population for reproduction and dispersal appears also to be low. The fragmentation potential of modifying the current roads and fragmenting the habitat appears it is likely to have considerable impact on the dispersibility of the species across the site. DEW draws Neoen's attention to current research underway by Mike Gardner, Professor of Biodiversity and Ecology at Flinders University, also on the PBTL Recovery Team, on Goyder South and Goyder North, to answer key questions on the impact of windfarms on PBTL including that of roads, such as whether the species can cross the roads and whether this results in reduced genetic diversity and reproduction. The outcome of this research would significantly inform understanding of impacts to the species and would contribute to the assessment of significant impact. There is reason for concern that windfarm roads may impact MNES regarding genetic diversity, reproduction and population. It is notable that many windfarms have proceeded on PBTL populations and habitat before this research has commenced, hence considerable impact to PBTL populations may have occurred. Any construction prior to the outcome of this research will not take all potential impacts into account.	Fragmentation effects have been considered through the assessments, and has been targeted by proposed mitigations and research objectives which form part of the offset strategy (to be applied to PBTL, but which could be extrapolated to apply to FRWL). In considering fragmentation as a potential impact of the Project, the resulting distrubution and subsequent population effects to PBTL are inherently considered. It is not possible to say whether the existing populations will be divided into individual smaller populations because the interaction with individuals from outside of the Project Area is not known, nor are the implications of the access tracks themselves. Whilst it is acknowledged that roads, particularly sealed roads, have the potential to create barriers to PBTL (and FRWL) genetic flow, a recent study (Wallace 2025) found that while PBTL gene flow was negatively influenced by sealed roads (i.e. bitumenised), no restricted gene flow was identified across an unsealed (i.e. dirt) road. As the GNWF Project does not intend to seal any roads, the likelihood of fragmentation impacts caused by roads, may be reduced. The Project Description (Attachment 01) and PD (Section 5.1.3 Erosion and Sedimentation (including land slippage)) have been updated to provide more details on where and how rocky rubble will be used in the access track civil design to manage surface water flows and erosion risks. In summary, typically only sections of track where slopes exceed approximately 8 degrees will require rocky rubble to control run off and erosion. Remaining roads across all flatter areas are to include less restrictive grassed swales as gutters with only intermittent rock checks required depending on gradient. These predominately grassed swales occur across large portions of the access track network, and will enable small reptiles (PBTL, FRWL) to readily cross. Neoen have also committed to trialling up to five 'engineered crossing' points for PBTL at key track locations post-construction of the WF (once heavy vehicle movements are completed). These trial 'engineered crossings' along with large portions of the access track network without rocky strew in gutters, will enable the research program to conduct further trials (on PBTL) using population genetics methods to determine whether gene flow is restricted across tracks. This is outlined as one of the objectives of the 'Other Compensatory Measures' research component of the PBTL offset for GNWF.	Yes	Draft PBTL Offset Management Plans (x2) are now available as Attachment 19 and 20 of the PD which outline details for each of proposed on-ground offset properties. The Offset MPs for PBTL include research objectives as the Other Comsensatory Measures component of the overall offset package which focus on better understanding PBTL road crossings (with trial crossing points proposed) as well as translocation/relation success. Section 9.4 of the PD has also been revised regarding the PBTL offset approach (updating the high level Strategy which was previously provided) and summarises the research objectives in Section 9.4.5 of the Other Compensatory Measures component of the offset package which includes a focus on better understanding PBTL road crossing success. Attachment 1 of the PD (Project Description) has been updated with civil engineering information regarding access road designs and drainage configuration (including a new figure). Based on updates to the Project Description Attachment 1, the PD has been updated where required to supplement existing text, specifically: - Section 2.2.6 of the PD - Section 5.1.3 of the PD - Section 5.2.5 of the PD - Section 5.2.7 of the PD - Section 7.1.6 PBTL impact assessment in PD - Section 7.4.3 FRWL impact assessment in PD Added information has been added to Attachment 03 of the PD (the Significant Impact Assessment). Specifically: - Section 1.3, Table 1.1 (Project elements) - Section 4 and Table 4.6 (PBTL) (including additional mitigations) - Section 4 and Table 4.6 (FRWL)
		Fragmentation - PBTL, FRWL, INTG	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 9 Table ES1 states alignment with existing infrastructure and cleared areas, thereby avoiding impacts to native vegetation and MNES habitat. <u>FRWL and INTG Road Interaction:</u> FRWL is similarly small in size and questionable whether this species can cross WF roads and whether this MNES is also likely to suffer from similar impacts to genetic diversity, reproduction and population as PBTL. For INTG and other vegetation, increased widening may result in further removal of vegetation, disruption of weeds and weed seeds held in the soil bank and combined with increased traffic, could lead to increased distrubution of weeds and degradation of INTG and other vegetation. PD stated there are at least 14 Declared weeds onsite, many of which are WoNS.	Neoen acknowledges that the aspects of the FRWL ecology, such as the species' sedentary nature, the extent of the species' home range, the species' ability to disperse across the landscape, and the species' ability to move across dirt tracks/dirt roads is largely unknown. The Wong et al . (2011) paper states that a similar species from the same genus, *Aprasia parapulchella* , has been recorded moving approximatley 30 m from a source population, and on this basis, Neoen has assessed FRWL as likely to disperse in a similar way/extent. Fragmentation risks to FRWL would be mitigated through similar measures to those applied to PBTL. i.e. Neoen have committed to trialling several 'engineered crossing' points for PBTL at key locations post-construction of the WF (once heavy vehicle movements are completed), and have proposed a design which only includes continuous rocky rubble in road gutters where slopes exceed 8 degrees, with remaining road drainages predominantely made up of grassed swales for gutters which will be readily crossable by small reptiles. These measures are expected to also benefit FRWL, and even occassional crossings of roads by FRWL would also enable gene flow across the areas. A total of 106 species of introduced flora (weeds) have been recorded throughout the Project Area during field surveys, as cited in Section 3.3.7.5 of the PD. This includes a total of 14 Declared Weeds under the Landsape South Australia Act, two of which are also Weeds of National Significance listed by the Commonwealth. Neoen commit to continued engagement with DEW and the NPPL team regarding GNWF and weed management activities in proximity to Mokota CP.	No change to PD required	Not applicable.

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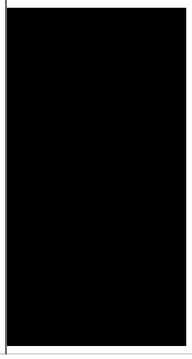
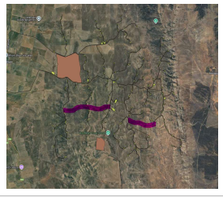
		Fragmentation	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 9 Table ES1 states alignment with existing infrastructure and cleared areas, thereby avoiding impacts to native vegetation and MNES habitat. Additional Roads Further Fragmentation: Regardless of the number of ha or % area of roads that align with current roads, additional roads proposed will result in reduced continuous land mass and land is fragmented into smaller sizes. DEW requests that consideration be given to impacts on the *spatial distribution and subsequent effect* this produces, not just *area* it comprises. First figure is a very approximate overlay of proposed WF and existing tracks recorded in DEW database (second figure). The pink highlight shows the roads which are new. Although these may be relatively small in area (ha), their placement is effectively likely to cause an increase in fragmentation and increases in edges on the formerly larger paddock sizes. Increases in edge effects generally results in increases in weed, light, and wind infiltration to vegetation and possible impact to reptile populations.  	Fragmentation effects have been considered through the assessments, and has been targeted by proposed mitigations and research objectives which form part of the offset strategy (to be applied to PBTL, but which could be extrapolated to apply to FRWL). In considering fragmentation as a potential impact of the Project, the resulting distrubution and subsequent population effects to PBTL are inherently considered. It is not possible to say whether the existing populations will be divided into individual smaller populations because the interaction with individuals from outside of the project area is not known, nor are the implications of the access tracks themselves. In the marked-up image provided, two of the longer highlighted areas running east-west are actually buried electrical cable alignments, which represent narrow, temporary disturbances and do not represent a risk of habitat fragmentation once back-filled. Whisit it is acknowledged that roads, particularly sealed roads, have the potential to create barriers to PBTL (and FRWL) genetic flow, a recent study (Wallace 2025) found that while PBTL gene flow was negatively influenced by sealed roads (i.e. bitumenised), no restricted gene flow was identified across an unsealed (i.e. dirt) road. As the GNWF Project does not intend to seal any roads, the likelihood of fragmentation impacts caused by roads, may be reduced. Neoen has proposed a road design (see Attchment 1 - Project Description) which includes built up shoulders and/or rocky substrate deployed in road gutters to manage surface water flows and erosion only where slopes exceed 8 degrees. Elsewhere, the road 'gutters' proposed are predominantely made up of grassed 'swales' (with only intermittent and largely infrequent rock checks at specified gradients for erosion control) which would readily enable small reptiles (PBTL, FRWL) to cross. Neoen have committed to trialling up to five 'engineered crossing' points for PBTL at key track locations post-construction of the WF (once heavy vehicle movements are completed). These trial 'engineered crossings' will enable the research program to conduct trials (on PBTL) using population genetics methods to determine whether gene flow is restricted across tracks. This is outlined as one of the objectives of the 'Other Compensatory Measures' research component of the PBTL offset for GNWF. Potential impacts as a result of edge effects are noted and have been assessed and discussed within the PD in relation to the specific MNES that are the subject of the RFI and Re-issued RFI. Potential edge effects could occur during the construction phase (which would include both permanent and temporary impacts associated with the development or upgrade of dirt roads/tracks) and the operational phase of the Project, as cited in Section 5.2, Table 5.4, and Section 5.2.2 of the PD. We consider the impact of edge effects as a result of direct clearance activites to be highly localised (i.e. directly adjacent to / or limited to close proximity to the clearance activities), and note that whilst the development of the Wind Farm will result in an increase in dirt roads/tracks, that these impacts are not likely to result in spatially extensive edge effects for most MNES. For PBTL, although research on this species has been limited historically in regards to the species ecology and behaviour in proximity to wind farms, we note the recent short study undertaken at the Goyder South Wind Farm (PBTL Preliminary Study Translocation Success, Umwelt 2025) which indicates a sustained/stable presence of PBTL individuals within a buffer of approximately 200 m adjacent to WTGs and other infrastructure.		Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to address DCCEEW comments on the draft version, and to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point for PBTL (which are linked with the proposed research objective of better understanding effectiveness of these trial crossing locations), as well as further details to manage the risk of poaching. Within the PD, Section 7.1.3, Table 7.9 has been updated to reflect these additional mitigations measures and the associated research re assessing the effectiveness of the engineered crossing points. Additional mitigations have also been added to Attachment 03 of the PD (the Significant Impact Assessment), specifically: - Section 4 and Table 4.6 (PBTL)
		Fragmentation - PBTL	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 9 Table 4.7, Pg 102 Possible PBTL Sub-populations: DEW is concerned that if PBTL are affected by fragmentation from roads and other infrastructure, the estimated pop size of 8,991 individuals could be broken up into multiple sub-populations by the wind farm roads, which may ultimately affect the viability of the population (see below re connectivity post-construction of GNWF). DEW provide further information below and recommends this is taken into account in the assessment process: - Table 4.7, p. 102 of the PD estimates the population of PBTL across the GNWF is between 5,595 and 8,991, which is a significant population that will be fragmented. The map below (left) shows the Project Area with proposed roads taken from the PD, with PBTL BDBSA records overlaid. The map below, right, shows most of the GNWF area is 'Likely'PBTL habitat (yellow). If PBTL cannot traverse windfarm roads, the possible consequence may be that there are numerous subpopulations created on a single windfarm area. The below image illustrates the outcome if PBTL cannot traverse around or over roads, with each possible subpopulation in a different colour. The result of this extreme and approximate estimate is 11 subpopulations. Note, it assumes PBTL cannot 'walk around' long obstructions to reach other populations (see black arrows) and the actual impact of fragmentation may be vastly different; as stated, the exact impact of fragmentatin is yet unknown.  	For gene flow to occur, it does not require PBTL to "walk around long obstructions to reach other populations". Genetic flow within populations occurs across multiple generations, and is not reliant on a single individual's (or cohort's) lifespan. Assuming individuals continue to breed with their neighbours on either side of 'barriers', there will eventually be cross over of genetic material at the ends of the barriers (in this case access tracks leading to WTGs which are 'dead-end tracks') and genetic material can then spread on the opposite side of the barrier. The figure (black arrows) also implies that the PBTL population in the area is entirely restricted to the GNWF Project Area, and that lizards from within the Project Area need to move around the Project Area to to enable successful gene flow, which is clearly not the case. There are numerous records of PBTL within the Project Area due to the amount of survey effort which has been undertaken, but the population also extends outwards from the Project Area in multiple directions, meaning there are significantly more opportunities for gene flow within the Project Area from PBTLs which are outside of the Project Area. It is noted that many of the access tracks proposed for the GNWF are existing roads (approximately 40 km). If we apply the arguement presented here, the PBTL population which is present is already fragmented and impacted to a degree, yet it persists. A recent unpublished thesis paper provided by the PBTL Recovery Team (Wallace, 2025), after development of the PD, provides data which indicates that while PBTL movement and therefore gene flow may be inhibited by bitumenised (sealed) roads, there was no evidence for restricted gene flow across an unsealed road. The access tracks around the GNWF are all unsealed roads/tracks, and Neoen's proposed road drainage design is predominantely lined by grass swales (with only intermittent rock checks for sediment control when gradient calls for it as outlined in the Project Description), aside from where ground slope exceeds 8 degrees and uninterrupted extensive rock substrate lining is typically required for erosion control. The 'Other Compensatory Measures' component of the PBTL offset for GNWF includes a research project which is focused on mitigation strategies for PBTL (differing from the impact assessment focus of the GS research). Neoen have committed to trialling up to five 'engineered crossing' points for PBTL at key locations post-construction of the WF (once heavy vehicle movements are completed), which would enable the research program to conduct trials using population genetics methods to determine whether gene flow occurs across tracks. Even occassional crossings of roads by PBTL would also enable gene flow across the areas, as is likely the case with the existing road network in the area. This research objective is outlined in the PBTL Offset Management Plans ([redacted] and [redacted]), which were not avilable at the time of Public Comment. The Preliminary Documentation, Section 9, has been updated to reflect this commitment. We note that the commenter acknowledges that the actual impacts of fragmentation may be vastly different to that outlined in the comment. Based on the above regarding genetic flow, we believe that will be the case.	Yes	Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to address DCCEEW comments on the draft version, and to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program, and further details to manage the risk of poaching. Draft PBTL Offset Management Plans (x2) are now available as Attachment 19 and 20 of the PD which outline details for each of proposed on-ground offset properties. The Offset MPs for PBTL include research objectives as the Other Comsensatory Measures component of the overall offset package, including a focus on assessing the trial crossing points. Table 1.3 in Section 1.5 of the PD has been updated to reflect the additional attachments. Section 9.4 of the PD has also been revised regarding the PBTL offset approach (updating the high level Strategy which was previously provided) and summarises the research objectives in Section 9.4.5 of the Other Compensatory Measures component of the offset package which includes a focus on assessing the trial crossing points, as well as better understanding translocation and relocation success. Section 2.2.6 of the PD and Attachment 1 (Project Description) have been updated to provide more detailed information which is now available regarding access track design. Design updates reflect proposed 'grassy swale' gutters which are proposed across the majority of the access road network, except where slopes are greater than 8 degrees.

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		Fragmentation - PBTL	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 9 Table 4.7, Pg 102 - There are numerous potential outcomes to the issue of connectivity post-construction of GNWF: * some subpopulations are too small to be viable and may die, thus reducing the overall population size; * some subpopulations, such as larger subpoplations, may continue to survive, but lose genetic diversity, with unknown longterm consequences; *PBTL populations deeper into fragemented areas may be more isolated than those on the outer parts of fragmented portions of the landscape (see green arrow); * Natural topography may or may not compound the fragmentation caused by windfarm infrastructure (see the underlying terrain, such as rocky hills, which may be unlikely to support burrows and function as natural barriers in addition to the windfarm roads, also see map below, right, which shows unsuitble PBTL habitat as green areas, possibly indicating PBTL on the south side of the Project Area will have less dispersability to northern subpopulations with windfarm roads present).	Neoen acknowledge that there is some uncertainty regarding the long term consequences of fragmentation as a result of the GNWF. However, Neoen note the following: There are numerous existing roads throughout the Project Area and region, as well as other features which inhibit movement of PBTL (e.g. actively cropped paddocks, rocky features and other unsuitable habitat), and PBTL's persist in these areas. The species is known to be 'genetically viscous' arising from their limited dispersal, and high relatedness between individuals in close proximity is a feature of the species. In addition, PBTLs from outside of the Project Area are able to readily move into the Project Area, and vice versa, reducing the potential affects for fragmentation within the Project Area. A recent unpublished thesis paper (Wallace, 2025) provided by the PBTL Recovery Team after development of the PD, provides data which indicates that while PBTL movement and therefore gene flow may be inhibited by bitumenised (sealed) roads, there was no evidence for restricted gene flow across an unsealed road. The access tracks around the GNWF are all proposed to be unsealed roads/tracks, and the road design only includes rocky substrate deployed in gutters to manage surface water flows and erosion where ground slope is in excess of 8 degrees, with the remaining large portions of the road network incorporating predominantly grassed 'swales' as road gutters which will be readily crossable by PBTL. Neoen have also committed to trialling up to five 'engineered crossing' points for PBTL at key locations along access tracks post-construction of the WF (once heavy vehicle movements are completed). The 'Other Compensatory Measures' component of the PBTL offset for GNWF includes a research project which is focused on mitigation strategies for PBTL (differing from the impact assessment focus of the GS research). Using the trial of up to five 'engineered crossing' points for PBTL, the research project will conduct trials using population genetics methods to determine whether gene flow occurs across tracks is restricted with and without these mitigation measures. Even occassional crossings of roads by PBTL would also enable gene flow across the areas, as is likely the case with the existing road network in the area currently. This research objective is outlined in the PBTL Offset Management Plans ([redacted] and [redacted]), which were not avilable at the time of Public Comment. The Preliminary Documentation, Section 9, has been updated to reflect this commitment.	Yes	Added information regarding the Wallace (2025) research thesis has been added to Attachment 03 of the PD (the Significant Impact Assessment), specifically: - Section 4 and Table 4.6 (PBTL) (including additional mitigations) - Section 4 and Table 4.6 (FRWL) Updates have also been made to Section 4.1 and Section 7.1 of the PD, specifically: - Section 4.1.2.1, Section 7.1 Table 7.2; Section 7.1.3 Table 7.9; Section 7.1.6 and Table 7.10; (for PBTL) - Section 7.4.3 and Table 7.23 (for FRWL) For section 7.1.3, Table 7.9 has been updated to reflect the additional mitigations measures regarding commitment to install up to five engineered crossing points for PBTLand the associated research re assessing the effectiveness of the engineered crossing points.
		Fragmentation - PBTL	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 9 Table 4.7, Pg 102 Onsite maintenance of connectivity - Mitigation a preferred option - Mitigation measures for fragmentation, has NEOEN thought of ways to enable PBTL connectivity in their design, such as through altering WF roads so they are traversable, or through tunnels under roads that are even with the ground? Outcomes from research undertaken on dispersal on Goyder South WF by Gardner will further inform mitigation measures/	As noted above, research objectives of the GNWF offset (other compensatory measures) include assessing the impacts of access tracks on PBTL fragmentation and the effectiveness of mitigations (engineered crossing points) post construction. These objectives are outlined in the PBTL Offset Management Plans ([redacted] and [redacted]) which are now available as drafts versions for DCCEEW review, but were not available at the time of public comment.	Yes	Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to address DCCEEW comments on the draft version, and to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program which includes assessing the effectiveness of the road crossing trials. Draft PBTL Offset Management Plans (x2) are now available as Attachment 19 and 20 of the PD which outline details for each of proposed on-ground offset properties. The Offset MPs for PBTL include research objectives as the Other Comsensatory Measures component of the overall offset package, including a focus on assessing the trial crossing points. Table 1.3 in Section 1.5 of the PD has been updated to reflect the additional attachments. Section 9.4 of the PD has also been revised regarding the PBTL offset approach (updating the high level Strategy which was previously provided) and summarises the research objectives in Section 9.4.5 of the Other Compensatory Measures component of the offset package which includes a focus on assessing the trial crossing points, as well as better understanding translocation and relocation success.
		Fragmentation - FRWL	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 9 Table 4.7, Pg 102 FRWL - similar situation may also exist for the FRWL in relation to fragmentation and dispersal. DEW suggest fragmentation of the FRWL is also considered as part of the assessment.	Fragmentation effects have been considered through the assessments, and has been targeted by proposed mitigations, as well as by research objectives which form part of the offset strategy (to be applied to PBTL, but which could be extrapolated to apply to FRWL). Mitigation strategies to reduce potential impacts of fragmentation have been considered throughout the design of the Project, and specifically within Table ES 1, Section 5.1 and Table 5.1 regarding Direct Impacts, within Section 5.4 and Section 5.4.1.6 which addressses potential cumulative impacts (the latter specific to FRWL). The assessment of potential impacts of fragmentation specific to FRWL habitat has been considered throughout Section 7.4, with specific assessment of fragmentation of FRWL habitat within Table 7.2.1, Table 7.22, and the SIA in Table 7.23. It is acknowledged that literature regarding the FRWL's ecology and behaviour is limited, however, based on a study undertaken by Wong et al. (2011) which suggested that *A. parapulchella* is able to move across the landscape and occupy new areas to some extent, with some individuals found to be approximately 30 m from possible source populations. It may be suggested that *A. pseudopulchella* may also exhibit a similar range of dispersal, noting this is likely the current known maximum range of dispersal for an *Aprasia sp* . Therefore, whilst populations may be temporarily fragmented during construction works, following the rehabilitation of Temporary Disturbance Footprint, the species may be reasonably expected to be able to cross any remaining permanent roads/tracks (i.e. Batter and drainage design was incorporated into the permanent road widths' 3D civil modelling. Based on this modelling the road width is required to vary across the site depending on topographical requirements. For the purposes of this assessment the typical permanent road width is assumed to be nominally 11 m). Fragmentation risks to FRWL would be mitigated through similar measures to those applied to PBTL. i.e. Neoen have committed to trialling several 'engineered crossing' points for PBTL at key locations post-construction of the WF (once heavy vehicle movements are completed), as well as a road design which includes grassed swales as road/track 'gutters' in all areas (with only intermittent rock checks for sediment control when gradient calls for it as outlined in the Project Description) aside from where ground slope exceeds 8 degrees. These measures are expected to also benefit FRWL, and even occassional crossings of roads by FRWL would also enable gene flow across the areas.	Yes	Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to address DCCEEW comments on the draft version, and to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program.
		Landscape changes	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 S 4 Wording of impact should recognise broader changes to the landscape of the Project Area. Current wording appears to reflect impacts as limited to the Disturbance Footprint only.	Noted. The PD addresses potential impacts to MNES, rather than ladscape changes.	No change to PD required	Not applicable.
		Fragmentation - PBTL and other MNES	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 S4 Section 4 of the PD phrases the impacts to MNES as limited to the Disturbance Footprint area (i.e. the total amount to be cleared) and compares this to the total estimated area of habitat within the Subregional mapping of NVIS. However this comparison does not appear to recognise the substantial impact that can occur to habitat of MNES through fragmentation and other means. Potential impacts to MNES that cannot be accurately captured in this comparison of Disturbance Footprint alone includes (the following species), as listed below	Comment noted. Broad statement only, with comments relating to specific species listed below.	No change to PD required	Not applicable.
		PBTL	Formal government comments - EPBC Act (Enclosure 1)	Comment / reference 10 S4, pg 105 of the PD PBTL - Pg 105 text, does not recognise impact that frgmentation caused by roads/infrastructure are likely to exert on the species. Impacts are not limited to the suitable PBTL habitat that falls within the disturbance footprint, but could be considered to impact all habitat in the Project Area through fragmentation. Total amound of habitat is considered to be 10,971.67 for PBTL to 11,154.14 ha in the Project Area. In consideration of fragmentation by roads, this would result in 7.33% of PBTL habitat in the subregions impacted, considerably higher than the 0.24% claimed.	Neoen disagree with the statement that all habitat in the Project Area should be considered to be impacted by fragmentation arising from the Project. There are numerous existing roads throughout the Project Area and region, as well as other features which inhibit movement of PBTL (e.g. actively cropped paddocks, rocky features and other unsuitable habitat), and PBTL's persist in these areas. The species is known to be 'genetically viscous' arising from their limited dispersal, and high relatedness between individuals in close proximity is a feature of the species. In addition, PBTLs from outside of the Project Area are able to readily move into the Project Area, as vice versa, meaning all habitat within the Project Area is not effected by fragmentation. Neoen's proposed road drainage design where rocky substrate deployed in road gutters to manage surface water flows and erosion is only required where slopes exceed 8 degrees, with grassed 'swales' in all other locations (with intermittent rock substrate checks prescribed for erosion control depending on gradient as outlined in the Project Description) to enable small reptiles (PBTL, FRWL) to readily cross. Neoen have committed to trialling up to five 'engineered crossing' points for PBTL at key track locations post-construction of the WF (once heavy vehicle movements are completed). These trial 'engineered crossings' along with grassed swales will enable the research program to conduct trials (on PBTL) using population genetics methods to determine whether gene flow is restricted across tracks. This is outlined as one of the objectives of the 'Other Compensatory Measures' research component of the PBTL offset for GNWF (see PBTL Offset Management Plans, [redacted] and [redacted], summarised in Section 9 of the PD). As such, considering the entire Project Area to be impacted and unsuitable for PBTLs, and subsequently offsetting for the entire Project Area for PBTL is unrealistic, and is based on an extreme worst case outcome that the entire Project Area will lose it's PBTL population. Our population estimates, including the estimates of numbers and areas impacted, have been reviewed by the PBTL recovery team, who are satisfied with the approach taken.	Yes	Updates have been made to Attachment 13 of the PD (the PBTL Management Plan) to address DCCEEW comments on the draft version, and to reflect additional mitigations proposed to reduce the risk of habitat fragmentation to PBTL (and other small reptiles). Updates include the addition of engineered crossing point trials for PBTL, tied into the proposed research program which includes assessing the effectiveness of the road crossing trials. Draft PBTL Offset Management Plans (x2) are now available as Attachment 19 and 20 of the PD which outline details for each of proposed on-ground offset properties. The Offset MPs for PBTL include research objectives as the Other Comsensatory Measures component of the overall offset package, including a focus on assessing the trial crossing points. Table 1.3 in Section 1.5 of the PD has been updated to reflect the additional attachments. Section 9.4 of the PD has also been revised regarding the PBTL offset approach (updating the high level Strategy which was previously provided) and summarises the research objectives in Section 9.4.5 of the Other Compensatory Measures component of the offset package which includes a focus on assessing the trial crossing points, as well as better understanding translocation and relocation success.

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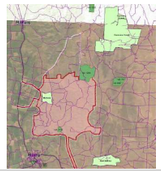
		FRWL	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 S4, Pg 136, Table 4.20, Pg 139, Pg 133 FRWL - Pg 136 states a total of 3,152.81 ha could be considered known and possible habitat in the Project Area, with 152.10 ha in the disturbance footprint. Table 4.20 states the total area of potential habitat impacted is 153.1 ha, referring to the disturbance footprint. Similar to PBTL, this does not consider the potential for impacts from fragmentation through roads and other infrastructure. Pg 133 stats it is noted that a recent study by Woinarski et al (2023) suggests the FRWL population is now considered stable, and the species no longer meets eligibility criteria for a threatened listing. However this species should be considered under the EPBC Act until a formal review of the status confirms otherwise.	Information contained within the PD is correct. Information contained within Umwelt's FRWL Assessment (Umwelt 2025 FRWL targeted survey) represents a point in time, and Neoen note that there are minor discrepancies in the latter document. We believe we have addressed potential impacts through fragmentation within the relevant species sections in the PD, including within Section 5 which lists potential and known direct and indirect impacts, as well as the SIA. We note comments mentioned in the DEW public comment document regarding elevated heights of roads and potential use of windrows/rocky edges of roadway Neoen's proposed road drainage design where rocky substrate deployed in road gutters to manage surface water flows and erosion is only required where slopes exceed 8 degrees, with grassed 'swales' in all other locations (with intermittent rock substrate checks prescribed for erosion control depending on gradient as outlined in the Project Description) to enable small reptiles (PBTL, FRWL) to readily cross. Neoen have committed to trialling up to five 'engineered crossing' points for PBTL at key track locations post-construction of the WF (once heavy vehicle movements are completed). These trial 'engineered crossings' along with grassed swales will enable the research program to conduct trials (on PBTL) using population genetics methods to determine whether gene flow is restricted across tracks. This is outlined as one of the objectives of the 'Other Compensatory Measures' research component of the PBTL offset for GNWF. Neoen confirm that despite the Woinarski et al (2023) paper, that the FRWL has been assesessed using the Australian Government's Matters of National Environmental Significance, Significant impact assessment guidelines 1.1, as referenced accordingly throughout the PD and SIA.	No change to PD required	Not applicable.
		Blue-winged Parrot	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 S 5.2.1, Pg 104, Table 4.23 of the Ecological Assessment Blue-winged Parrot - the BWP was not recorded during field surveys and was not considered to be a regular visitor to the Project Area. Table 4.23 of the PD states the area of potential habitat for BWP relative to that available in the subregion (1,620,063 ha) is relatively low (0.03%). However, similar to other examples, the principle of considering impact to a species should still be the Project Area level, not just Disturbance Footprint level. The PD states 15,540.66 ha of BWP suitable habitat of the 17,700 ha Project Area. To claim majority of this habitat remains suitable for a parrot by only calculating the area of habitat within DF assumes the parrots can safely access the remaining habitat within the Project Area with no reduction in that capacity, which may be unlikely with WTG present. Parrots constitute a large proportion of bird mortalities on wind farms. Parrots constitue the majority (39%) of bird strikes recorded on Hornsdale WF. If installation of turbines made access to habitat in the Project Area unsafe, this would constitute a reduction in habitat quality to nearly 1% of suitable habitat in the subregion, as opposed to just 0.03%. Notably, BWP were observed on Whyte Yarcowie (2) and Twin Creek (3) proposed nearby wind farms, the former constituting 10,026.67 ha (99.603% of the Project Area, 10,066.63 ha)) with BWP area of habitat currently unavailable for the latter. This results in a further 0.62% of BWP habitat fragmented with wind turbines known to cause parrot mortalities, cumulatively totalling 1.62% of BWP-suitable habitat impacted across two proposed wind farms for which it is able to be calculated with available data.	Eight BBUS surveys were recently undertaken across a period of two years between Spring 2023 and Spring 2025, and in accordance with DCCEEW's Draft Onshore Wind Farm Guidance (2024). Results of the BBUS did not identify any BWP, or any MNES (avifauna or bat species) at risk based on flight heights, including BWP, with the exception of the Fork-tailed Swift (Migratory), with one individual Fork-tailed Swift recorded at Site 12 as a flyover species. Non-MNES species are not considered under the EPBC Act, and thus are not considered within the PD. Currently the EPBC Act does not account for or provide provisions or guidance for cumulative impact assessments for MNES (this is a flaw in the legislation that has been identified in both the Samuel Review (2020) and the Wentworth Group of Concerned Scientists (2023)). However, a robust cumulative impact assessment has been undertaken for all MNES identified in DCCEEW's RFI (dated 5 December 2024), including BWP. Whilst there is no formal guidance for how to undertake cumulative impact assessments under the EPBC Act, the cumulative impact assessment provided in Section 5.4 of the PD has taken into consideration all potential and known impacts to those MNES which are potentially relevant to the GNWF and up to a 50 km radius from the boundary of the Project Area, and using the extent of occurrence (EOO) for PBTL, using publicly available information from DCCEEW's EPBC Act Public Portal. This extends to methodology regarding avian species with respect to the aerial space above proposed wind farms, and Neoen notes that in such cumulative assessments undertaken for other nearby wind farm projects, that the disturbance footprint has been the area (ha) used for those assessments rather than the entirety of the project area (i.e. it would set a new precedent to assess this individual species based on the entirety of the Project Area), further acknowledging the species has not previously been recorded across the eight BBUS or other ecological surveys within the GNWF Project Area). DCCEEW reviewed the PD prior to public comment, and appeared satisfied with the approach taken regarding the assessment of cumulative impacts, noting no comments were received in the re-issued RFI dated 26 September 2025. As such, no changes to the cumulative impact assessment for this species are proposed. Potential cumulative impacts to BWP, including impacts of other projects in the region, were captured and assessed based upon publicly available information on the EPBC Act Public Portal, which includes all referrals that include impacts or potential impacts to BWP, as outlined in Section 5 of the PD, and specifically for BWP, in Section 5.4.1.7. It is expected that any and all projects which impact BWP should be referred, thus Neoen believes the cumulative impact assessment captures the pertinent data re cumulative impacts. Neoen notes that this species has not been subjected to controlled actions for the projects included within these EPBC referrals (including the operational Hornsdale Wind Farm), which makes actual or potential impacts to this species difficult to quantify with the limited publicly available records, literature or reports (i.e. specific data on bird mortalities on wind farms). However, Neoen acknowledges that the total area and disturbance footprint has been provided for potential impacts to BWP for in those projects. The other projects mentioned (Whyte Yarcowie and Twin Creek) are also in the approvals phase and are not guaranteed to proceed. Each project will be assessed by regulators on its merits, including consideration of cumulative impacts and the offsets offered by proponents. Neoen considers that its proactive efforts in sourcing and securing options for substantial on-ground offsets prior to any approval decisions demonstrate its commitment to biodiversity outcomes. The offsets selected provide suitable habitat for BWP and, under conservation management, are likely to improve the condition of foraging habitat across large areas.	No change to PD required	Not applicable.
		South Eastern Hooded Robin	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 S 4.2.7, Pg 11 South Eastern Hooded Robin - Section 4.2.7 of the PD states "of the 756,979 ha of potentially suitable habitat in the affected subregions, 41.07 ha is proposed to be impacted, representing 0.005% of potentially suitable habitat available in subregions. Section 6.2.3 of the Ecological Assessment Pg 136 states there is a total of 2,795.87 ha of potentially suitable SEHR habitat in the broader GNREF, with up to three breeding pairs estimated to occur in the OTL disturbance footprint and 25 to 185 pairs in the broader OTL Project Area in suitable habitat. A total of 8 individuals were observed across three survey obervations.	Comment only. No specific concerns raised. Statements noted.	No change to PD required	Not applicable.
		Southern Whiteface	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 Pg 129 Southern Whiteface - The PD states of 831,652 ha of potentially suitable habitat in the affected subregions, 57.97 ha is proposed to be impacted, representing 0.007% of the potentially suitable habitat available in the subregions. No dedicated SWF surveys were undertaken in the OTL, but 9.94ha is mapped in the OTL as habitat for SWF with at least one feature of the listed critical habitat (p. 126 of PD).	The Southern Whiteface is a protected matter that was triggered for under the controlling provision of listed threatened species and communities (s18 and 18A of the EPBC Act), as stated in the Referral decision for a controlled action and preliminary documentation assessment approach, dated November 14 2024. The occurence of Southern Whiteface within the Project Area is discussed in detail in Section 4.3.6 of the PD. BBUS surveys were undertaken over 2 years within the WF (the intent of the BBUS surveys), but did not cover the OTL line. Dedicated avian surveys were conducted along the OTL line (southern end) for the purpose of assessing Mallee Bird Community TEC, and opportunistic observations of species, including Southern Whiteface, were recorded during the course of other survey work such as PBTL surveys and targeted vegetation surveys, as seen on Figure 4.9 in the PD. Habitat is mapped as suitable for the species based on known and published requirements using the vegetation and habitat mapping undertaken which was verified on ground, as indicated in Figure 3.5, 3.6 and 3.7 of the PD. The species is widespread across much of South Australia, and southern Australia (see Section 4.3.7 of the PD), and the impacts from a narrow access track beneath the OTL are not considered significant, so no targeted surveys were undertaken in this location. Regarding potential critical habitat, the SIA for SWF states" These calculations include all areas mapped as these associations as potentially suitable habitat; however, it is likely that not all patches constitute critical habitat. For example, many areas mapped as mallee woodland are lacking a grassy component to the understorey or comprise areas of high tree density which are not preferred for foraging. Additionally, given the long history of disturbance from agricultural grazing practices, most areas are lacking an herbaceous understorey. Based on the critical habitat criteria, up to 28.81 ha in the WF and 9.94 ha in the OTL contain at least one feature of the listed critical habitat." Significant impact criteria specifically for this species are addressed in Significant Impact Assessment for this species, in Seciton 7.3.3 and Table 7.19: SIA for Southern Whiteface, listed as Vulnerable under the EPBC Act. The PD also discusses the Acceptability of Relevant Impacts for this species in Section 7.3.3.1 of the PD. Based on the information presented, Southern Whiteface have been assessed as not a significant impact.	No change to PD required	Not applicable.
		Diamond Firetail	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 Pg 401 The PD states The Disturbance Footprint associated with the Project may impact upon potentially suitable habitat for the Diamond Firetail across the Project Area, resulting in an estimated maximum potential impact area of 23.53 ha in the WF and 7.89 ha along the OTL. Of the 347,531 ha of potentially suitable habitat in the affected subregions, 31.42 ha occurs within the Disturbance Footprint, representing 0.009% of the potentially suitable habitat available in the subregions. Does this consider the suitable habitat in the overall Project Area that could suffer impacts from fragmentation and other sources (see Section 2g of this document)? It is also important to consider the cumulative impact where the DF [species?]has been impacted by other proposals in the region.	A cumulative impact assessment was undertaken for the GNWF, using an extensive array of public documentation that was available via DCCEEW's EPBC Act Public Portal at the time of preparation of the PD. As such, cumulative impacts are provided in Section 5.4, Table 5.7 of the PD for all MNES identified as relevant to the GNWF as outlined in DCCEEW's RFI, inclusive of those MNES which were impacted or potentially impacted by other EPBC referred project's within a 50 km buffer. Potential cumulative impacts specific to the Diamond Firetail are described in Table 5.7 and Section 5.4.1.8 of the PD. The assessment of potential impacts to Diamond Firetail, including potential fragmentation of habitat, are presented in Section 7.6 of the PD, with the significant impact assessment for the Diamond Firetail in Section 7.6.3 and Table 7.31: SIA for Diamond Firetail, listed as Vulnerable under the EPBC Act. The SIA noted that WF access tracks, and access tracks beneath OTL and the OTL itself are not expected to hinder movement for this bird species which would readily fly across narrow tracks, and hench gene flow is not expected to be altered by the project. As such, habitat fragmentation is not expected to represent a high risk to the species. Impacts not considered significant. The Acceptability of relevant impacts is described in Section 7.6.3.1.	No change to PD required	Not applicable.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		Fragmentation - MBC	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 10 S 4.16.6, Pg 238 Mallee Bird Community - Section 4.16.6 of the PD states just 0.76 ha of suitable MBC habitat is in the Disturbance Footprint. It appears based on the description and Figure 4.43 of the PD that impact is considered limited to the Disturbance Footprint and does not consider fragmentation or other impacts.	Potential impacts associated with Fragmentation of the MBC is addressed in Section 7.16 of the PD, specifically in Table 7.63, Table 7.64, and Table 7.65 (the SIA, assessed against the Australian Government's Matters of National Environmental Significance, Significant impact assessment guidelines 1.1, as referenced accordingly throughout the PD and SIA). In the MDD bioregion, to meet the requirements of the Mallee Bird Community (MBC), patches of mallee need to be: - Located in the MDD Bioregion - At least 5 ha of mallee-dominant vegetation within a patch of native vegetation of at least 10 ha in total - The patch can have breaks of up to 100 m between areas that meet the habitat description, as many birds can traverse this distance (as stated in the Conservation Advice) - Records from the last 10 years within 20 km include at least three MBC species Although the Disturbance Footprint (DF) intersects some 'patches' of mallee, the proximity to other patches, the contiguous nature of the native vegetation in total, and the narrow width of the intersection by the DF (6 m – max 50 m for tower footprint) does not change the MBC listing or condition of any standalone patch.	No change to PD required	Not applicable.
		Edge effects	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 11 **Avoidance Behaviours and Edge Effects Mitigation Comments** Section 5.2.2 Displacement of Fauna through Edge Effects or Avoidance Behaviours, of the Preliminary Documentation, p263 This section states that edge effects from wind farm and the potential tendency of fauna to avoid the proposed wind farm are mitigated by the fact its placed adjacent conservation reserves: "Additionally, it is noted that large areas of habitat under conservation directly adjoin the Project Area of the GNWF (i.e. Mokota CP, Tiliqua Nature Reserve, and Mongolurring Nature Reserve), further mitigating the potential impacts of edge effects." This statement appears to soften the description of impacts to fauna as a result of the GNWF and holds assumptions. These assumptions include: * At least some fauna residing on GNWF and some fauna utilising GNWF from other areas travelling to the site, will instead be able to find equally suitable and available habitat in the adjacent reserves instead, thus impacts from the GNWF will be mitigated due to its placement adjacent conservation reserves; * Habitat within the reserves provides the same resources as that present on GNWF; * The reserved habitat is not already full at carrying capacity with fauna already using these reserves with established territories; * Habitat in reserves is superior to that on GNWF, however there are many resources on this site (GNWF) that are not likely to be provided by a reserve; * Suitable habitat nearby GNWF (i.e. reserves) will not act as an attractant, with the adjacent windfarm infrastructure (which they may attempt to pass through) known to cause animal mortalities will not likely act as a sink. An example that challenges these assumptions where particular resources may be present on GNWF (and not easily replicable on reserves) would be in relation to raptors as a fauna group, which require the resource of space surveillance, hunt and undertake aerobatic displays. Although the reserves may support considerably more native vegetation and in better condition than that on GNWF Project Area, they are of restricted size, will be fragmented even further by the landscape with turbines, are often comprised of elevated land masses and treed areas with considerable vegetation ground cover rather than open plains where there is high visibility of prey. The farmland of GNWF (without turbines) currently provides such resources. Raptors comprise a significant proportion of the bird mortalities on wind farms due to the installation of turbines. The installation of turbines, particularly of such high concentration as indicated by the proposal between reserves, is almost certain to cause raptor mortalities. The presence of reserves adjacent the GNWF is not likely to provide alternative habitat that is not already taken up by species. The installation of turbines at GNWF will result in a net loss of open space for raptors to safely hunt. The statement that impacts to fauna species that value the current habitat at the proposed GNWF will be mitigated by the presence of reserves adjacent the GNWF requires justification as to which fauna species this applies to and the addressing of the above assumptions.	Representative habitats for all habitats directly impacted during the construction of the GNWF are found extensively throughout the 17,700 ha GNWF Project Area. Any fauna potentially displaced as a result of clearance and construction activities that are to occur within the Disturbance Footprint would be expected to be able to relocate into adjacent and connected suitable habitat. Construction of the Project is expected to take between 2-3 years across the entire Project Area, however, many areas to be impacted will have a substantially shorter timeframe for construction as the construction activity moves across the site. While we recognise that the displacement of fauna during construction activites can be difficult for individuals animals, most avifauna that occur within the GNWF are highly mobile and would be expected to be capable of nearby relocation. For less mobile species such as the PBTL, pre-clearance surveys will be undertaken to salvage individual animals and relocate or translocate as deemed appropriate by experienced ecologists, and in line with legislative and regulatory guidelines, such as those described within Section 5.4, Section 6.2.2 (and specifically within the PBTL MP), and Section 7.1.2. FRWL will also be opportunistically relocated to outside of the Disturbance Footprint, if detected during PCC surveys, and Neoen will work with Flinders University to enable researches to conduct trials of spider burrow relocations prior to disturbance. Whilst the intent of the referenced sentence was not to suggest that species can flock enmass to the conservations areas due to being displaced by construction activities associated with the GNWF, we do make note that these conservation areas may be referred to as biodiversity sinks, which can often represent areas of higher carrying capacity and genetic variability/diversity within populations, thereby acting as biodiversity hotspots and temporary refuges that could potentially support individual animals that may be impacted by temporary disturbance activities. In regards to carrying capacity, we note that for many species this is particularly dependent upon seasonal conditions (e.g. PBTL), and as seasonal conditions can be highly variable, there is variable carrying capacity between seasons and years, making any assumption of carrying capacity relevant at a point in time only and difficult to predict. We acknowledge that habitat within the aforementioned reserves may not provide the same resouces as that present within the GNWF (e.g. grasslands with spider burrows), however, we have cited the areas within the GNWF that will be retained and not subject to direct disturbances (Section 5.1.1 and Table 5.2 of the PD), which includes a substantial area within the Project Area, totalling approximately 15,192.02 ha of native vegetation, and approximately 1,968.99 ha of other vegetation (comprised of amenity, exotic, cropped, and previously cleared / unsurveyed habitat). We note reference to raptor species and potential displacement and / or mortality of these species in terms of aerial habitat loss due to the operation of WTGs. No MNES raptor species or other birds of prey were recorded during the BBUS surveys or other ecological surveys undertaken within the GNWF Project Area. As such, while these Non-MNES species have been considered, they are not the subject of the EPBC referral or assessment by PD. WTG exclusion zones exceeding 500m have been implemented around the one known WTE nest, which has not been observed to be active during the survey period since 2022. This exclusion zone aims to minimise potential impacts on juvenile WTE as a result of naievity to WTGs as they are developing flight skills. Although WTGs are known to cause mortality of WTEs, WTE in Tasmania have demonstrated distinct avoidance of the turbines, indicating learned avoidance behaviour to reduce risk to individuals (Hull et al 2012). Similarly, although the eagles modified the way the utilised the site, there was no evidence to suggest that invidiuals stopped utilising a wind farm site due to the presence of WTGs, and that WTE (and White-bellied Sea Eagles) continued to breed and forage at the site.		Not applicable.
		Edge effects	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 11 Section 5.2.2 Displacement of Fauna through Edge Effects or Avoidance Behaviours, of the Preliminary Documentation, p263 The statement in Section 5.2.2 Displacement of Fauna MNES through Edge Effects or Avoidance Behaviours, of the Preliminary Documentation, page 263: "Impacts as a result of edge effects associated with GNWF are considered to be minimal, as the Disturbance Footprint is typically narrow and linear and will utilise existing roads, tracks and corridors where practicable, with habitat outside of the Disturbance Footprint expected to remain intact and of the same or improved quality due to improved land management practices." This statement downplays impacts as a result of Edge Effects and Avoidance Behaviours of fauna. Raptors and parrots are known to comprise a significant proportion of mortalities as a result of wind turbines, with Hornsdale windfarm detecting 72 bird deaths from 13 bird species, across 5-7 turbines monitored of the 99 present. 	Potential impacts as a result of edge effects are noted and have been assessed and discussed within the PD in relation to the specific MNES that are the subject of the RFI and Re-issued RFI. Potential edge effects could occur during the construction phase (which would include both permanent and temporary impacts associated with the development or upgrade of dirt roads/tracks) and the operational phase of the Project, as cited in Section 5.2, Table 5.4, and Section 5.2.2 of the PD. We consider the impact of edge effects as a result of direct clearance activites to be highly localised (i.e. directly adjacent to / or limited to close proximity to the clearance activities), and note that whilst the development of the Wind Farm will result in an increase in dirt roads/tracks, that these impacts are not likely to result in spatially extensive edge effects for most MNES. For PBTL, although research on this species has been limited historically in regards to the species ecology and behaviour in proximity to wind farms, we note the recent short study undertaken at the Goyder South Wind Farm (PBTL Preliminary Study Translocation Success, Umwelt 2025) which indicates a sustained/stable presence of PBTL individuals wihtin a buffer of approximately 200 m adjacent to WTGs and other infrastructure. For INTG, potential impacts of edge effects has been assessed in Section 7.15 and Table 7.58 of the PD. Edge effects for INTG, due to fragmentation, have been assessed as a low risk of being ecologically significant, principally due to the narrow corridor widths which will continue to allow genetic dispersal of plant material via wind or water flow. Where infrastructure will intersect with patches of INTG, we note it will predominantly follow existing roads and tracks where minor edge effects already occur (See Preliminary Documentation Section 4.15.7.1, Figure 4.41 and Table 4.51). We acknowledge that one patch of INTG will be fragmented by a road (patch 32, approximatley 447 m), which was unavoidable based on technical constraints related to electrical cabling. The primary risk associated with edge effects to INTG is related to the increased potential for establishment and / or spread of weeds in the disturbed soil, which can then spread into the surrounding patch of INTG and degrade its condition by outcompeting native species and filling the intertussock spaces necessary to suppport herbeacous species diversity. Neoen has developed a specific INTG Management Plan to address the potential risk of indirect impacts, which includes a rigorous monitoring program to enable early detection and treatement. The monitoring program includes, but is not limited to, detailed baseline mapping of Delcared weeds in the impated INTG areas, quarterly audits for Declared weeds in disturbed areas of INTG including photo-points at high risk locations, mandatory reporting of opportunistic sightings of declared weeds or new weed species, and annual monitoring at dedicated 'rehabilitation', 'impact' and 'control' sites by qualified ecological consultants. As per the response above, we note reference to raptor species and potential displacement of these species in terms of aerial habitat loss due to the operation of WTGs. No MNES raptor species or other birds of prey were recorded during the eight BBUS surveys or other ecological surveys undertaken within the Project Area. As such, while these Non-MNES species have been considered within the Ecological Report (Umwelt 2025), they are not the subject of the EPBC referral or assessment by PD. Neoen acknowledges that edge effects can pose a threatening process for some species, such as BWP (listed in the species Conservation Advice; DCCEEW 2023). This species was has not been detected during the eight BBUS surveys undertaken within the GNWF, nor during other ecological surveys of the Project Area, and as such, has been considered unlikely to occur within the Project Area.		Not applicable.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		Bird strike, post-construction / operational monitoring, climate variability	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 12 **Post construction Monitoring** There remains areas where impacts on species require further studies, such as birds. Issues with past post-construction monitoring, as seen with Hornsdale WF include: - short time frames (5yr monitoring does not allow the influence of climate variability on species to be elucidated and distinguished from impacts on species from turbines). - habitat variability (the sample of turbines monitored are selected from a single habitat type rather than enough sampled from variety of habitats that occur on wind farms to enable predictions of avian mortalities per turbine to be derived). DEW recommends this is improved, so that predicions of mortalities of birds per turbine can be ascertained over a 10-20 yr time frame to account for climate variability. A similar approach (considering climate and habitat variability and length of monitoring time) is recommended to be considered for other species (including MNES) monitored post construction also.	Neoen acknowledges that best practice post-construction / operational monitoring would include longer monitoring timeframes and monitoring of potential bat or avian injuries/fatalities, including carcass retrieval, across a range of different habitats that are present within the GNWF. It is noted that there is not a standard one-size-fits-all monitoring method for wind farms, and that modelling of predicted impacts often presents as a complex and often challenging undertaking, which should be adaptable in order to accurately assess operational impacts. Neoen acknowledge DEW's comment regarding the monitoring of individual turbines in regarding to bird strike, which would inform or enable predictions of avian mortalities per turbine to be derived. The requirement for further surveys and monitoring programs, including their timeframes, is guided by regulators during the approvals process and associated conditions. This includes whether a Bird and Bat Adaptive Management Plan (BBAMP) is required, which typically incorporates scavenger trials, turbine collision monitoring, and ongoing Bird and Bat Utilization Surveys (BBUS). Monitoring and reporting timeframes are determined based on the perceived risk of the site and regulatory requirements. We also acknowledge that a more standardized approach among regulators would assist proponents in accurately planning for and accommodating such requirements within project timelines and financial planning. Neoen will comply with all conditions of approval and work with regulators to ensure monitoring programs meet best practice standards and achieve the intended outcomes.	No change to PD required	Not applicable.
		Bird strike	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 13 **Windfarm Design** DEW provides the following for consideration on improved design: - to reduce bird collisions an improvement to paint 1/3 turbine blade black. Trialled in Norway and found a 71.9% reduction in bird strikes. Cost of this is likely minimial if done pre-construction. Experiment now being tested in Oregon State Uni. - detection systems (that run on u/g cables as opposed to wireless technology to avoid artificial EMR emissions on sites) may be useful in improving avian safety (Gemard et al. 2024) Gémard, C., Duriez, O., Chappe, O., Duclos, G., & Besnard, A. (2025). Towards a better understanding of avian collision in wind energy facilities using automatic detection systems. Journal of Applied Ecology, 62, 1437–1448. https://doi.org/10.1111/1365-2664.70055 Lloyd JD, Butryn R, Pearman-Gillman S, Allison TD (2023) Seasonal patterns of bird and bat collision fatalities at wind turbines. PLoS ONE 18(5): e0284778. https://doi.org/10.1371/journal. pone.0284778; Nealon, S. 2024, Scientists studying impact of painting wind turbine blade black to reduce bird collisions, Oregon State University Newsroom, URL: https://news.oregonstate.edu/news/scientists-studying-impact-painting-wind-turbine-blade-black-reduce-bird-collisions>; Schippers P, Buij R, Schotman A, Verboom J, van der Jeugd H, Jongejans E. Mortality limits used in wind energy impact assessment underestimate impacts of wind farms on bird populations. Ecol Evol. 2020; 10: 6274–6287. https://doi.org/10.1002/ece3.6360.	The option of painting one blade black on each WTG was raised at the SCAP hearing associated with the State Development Application (now approved), and it was argued that the visual impacts of doing this could outweigh the potential benefits. As several comments have been received through the public comment process and at community engagement sessions regarding visual ammenity, Neoen intend to leave all blade colours as planned, and not paint one blade black, with the objective of minimising visual impacts. Eight BBUS surveys were recently undertaken across a period of two years between Spring 2023 and Spring 2025, and in accordance with DCCEEW's Draft Onshore Wind Farm Guidance (2024). Results of the BBUS did not identify any MNES (avifauna or bat species) at risk based on flight heights, with the exception of the Fork-tailed Swift (Migratory), with one individual Fork-tailed Swift recorded at Site 12 as a flyover species. (this species is further discussed in Row 82)	No change to PD required	Not applicable.
		Visual impacts to Burra and National Heritage Township. Burra World Heritage bid. WTG layout	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 14 **EPBC Act - National Heritage Places** <u>Australian Cornish Mining Sites: Burra and Moonta</u> Australian Cornish Mining Sites Burra and Moonta are National Heritage Places. Burra site is within the NHP and is also with the Burra State Heritage Area. The Australian Cornish Mining Site (Burra and Moonta) was added to Australia's Tentative World Heritage List on 3 Sep 2024. The proposed WF may impact views from Burra mine site. The WTGs with the most visual impact on the Burra mine site when viewed from Burra are the nine WTGs located in the south/east corner (WTG 001,2,3,5,6,14,15,16,17). DEW considers clarification is needed due to some discrepancies in relation to the number of turbines proposed. The 1 Feb 2024 Heritage Impact Statement states there will be 135 turbines. The variation letter dated 4 Jun 2025 is requesting 99 turbines, increased from 92 turbines. S 2.2.1Pg 19 The Neoen Oct 2025 report states the project will be up to 99 WTGs. However Fig 2.2 Pg 37 shows 138 turbines. Further the citing of WTG and certainty that views of the WTGs are minimised as much as possible shall be incorporated into the assessment.	The visual impacts of the GNWF on the National Heritage listed Australian Cornish Mining Sites (Burra township) were considered in the EPBC referral for the GNWF, and were also were assessed through the State Development Application process. The referral was supported by visual modelling and assessment undertaken by Biosis (2024) which concluded that the National Heritage Listed township of Burra was approximately 2.7km from the Goyder Renewable Energy Facility at it's closest point. Views from the township of Burra are not cited in the National Heritage criteria, or the State Heritage statement of significance. and the Goyder North Project was determined to not have a significant impact on the Nationally-Listed Heritate site, as defined by the Significant Impact Guidelines 1.2. Visual and heritage assessments were conducted on an earlier design, with more turbines. This is the reason for the discrepancy in the number of turbines. The Heritage Listed site was not included as a controlling provision in the 'controlled action' decision from the referral, and further assessment of the Heritage -Listed site was not requested in the Request for Information for the Preliminary Documentation. With regards to Burra's future World Heritage bid, the Preliminary Documentation did not consider this future possibility (which may or may not eventuate), as the township has not yet been listed, and is therefore not protected as a World Heritage MNES. This would be akin to fully assessing currently common species in the event that they were listed as nationally threatened in the future. Visual impacts themselves are not MNES. Neoen acknowledges that changes to the turbine configuration over time, as documented across various approval and assessment materials, may create confusion regarding the total number of wind turbine generators (WTGs) being proposed. Neoen also acknowledges that Figure 2.2 may be difficult to interpret without context regarding the iterative design process undertaken for the Project. The apparent discrepancy arises from the WTG numbering system, which is not sequential due to multiple design revisions during project development. Earlier design iterations included additional turbines (beyond the maximum stated number of 135, which were approved in the original development consent) that have since been removed, which has resulted in gaps in the numbering sequence. Through successive design refinements, the number of proposed WTGs has been reduced to 99, consistent with the variation letter. Although Figure 2.2 displays WTG labels extending to WTG 138, this reflects the retained historical numbering system rather than the number of turbines currently proposed. Only 99 turbine locations are shown in the figure. For clarity, the following WTG numbers are not present in Figure 2.2: 4, 12, 18, 19, 30-36, 48, 49, 54, 55, 60-75, 93, 99-104 and 108.	No change to PD required	Not applicable.
		PBTL population estimate	Formal government comments - EPBC Act (Enclosure 1)	Comment/ reference 15 **Potential Corrections** <u>PBTL population - possible error</u> Table 4.7 Pg 102 Table 4.7 of the PD states the estimated PBTL population is between 8,991.03 and 5,595.55 individuals on the GNWF. However, 0.51 multiplied by 17,703.63 equals 9,028.85. Is this correct?	The difference noted in the calculation in Table 4.7 is due to a rounding issue in Excel. The presented figure of 8,991.03 was based on the actual formula calculation, which included additional decimal places beyond the rounded value of 0.51 shown in the table. When the full precision of the calculation is applied (0.50786), and given the large habitat area (17,703 ha), the result aligns with the figure presented in the Preliminary Documentation. This minor discrepancy is inconsequential to the overall assessment and does not affect the conclusions of the impact assessment, mitigation measures or offsets for PBTL outlined in the Preliminary Documentation.	No change to PD required	Not applicable.
24/11/2025	South Australian Government (DEW) - [redacted]	State Matters - Wedge-tailed Eagle	Formal government comments - State Matters (Attachment A)	Comment/ reference 1 Table 6.1 Wedge-tailed Eagle Nests Turbine Set Back - The proposal states in Table 6.1 of the PD that the buffer distance of turbines from Wedge-tailed Eagle (WTE) nests will be determined in consultation with qualified ecologists based on nest activity and locations. The criteria and basis of the proposed buffer should be detailed in the PD.	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. One Wedge-tailed Eagle Nest was reported in Umwelt's Ecological Assessment Report (2025). The nest was first reported in spring 2022 and has been monitored regularly as part of the BBUS and other surveys in 2023 and 2024, and has not been observed to be active. Neoen has established buffers exceeding 500 m from any WTG, with the closest known nest approximately 676 m from the nearest WTG.	No change to PD required.	Not applicable.
		State Matters - Elegant Parrot	Formal government comments - State Matters (Attachment A)	Comment/ reference 1 Pg 169 GNWF Ecological Assessment State Rare Elegant Parrot Potential Impacts - DEW suggests that impacts on fragmentation of habitat is considered for SA's State Rare Elegant Parrot which has 13 individuals recorded onsite at GNWF.	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. Neoen acknowledges that thirteen individuals of the species were detected across five locations throughout the field surveys in spring 2022, flying over open grassland or chenopod shrublands, with a further observation made in February 2025 on a drainage line in the south-east of the WF (seven individuals observed foraging on the ground for introduced plant species Heliotropium spp. (Potato weed). Neoen acknowledge that it is considered likely that this species utilises the Project Area for both foraging and breeding, with plentiful resources noted in the east of the WF and along the OTL. Results of the BBUS to date indicate this species is not a resident within the Project Area, but rather an infrequent visitor.	No change to PD required.	Not applicable.

Date of comment	Comment received from	Comment topic	Comment type / style	Summary of comments received	Response	Update required to Preliminary Documentation?	Details of updates made to Preliminary Documentation
		NPW Act commitments and permiting requirements	Formal government comments - State Matters (Attachment A)	Comment/ reference 1 Manage, control or destroy protected wildlife - As part of undertaking this action, Neoen will be required to manage, control or destroy protected wildlife under the SA National Parks and Wildlife Act 1972, the proponent should be aware there may be permitting requirements that apply. Further information can be viewed at the Department for Environment and Water's website at https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/permit-types/manage-control-destroy-native-animals	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. Statement regarding permiting requirements noted.	No change to PD required.	Not applicable.
		Burra State Heritage Area	Formal government comments - State Matters (Attachment A)	Comment/ referene 2 Burra State Heritage Area is a State listed Heritage Area under the Heritage Places Act 1993. The proposed WF will impact views from the Burra mine site, which is one of the most significant sites within the Burra State Heritage Area under the Act. It is unclear if any road alterations in or around Burra will be required when transporting the turbines to site. The report states that transportation will be via the Barrier Highway. If Copperhouse Rd will be used, there may be impacts to the surrounding roadsides in this section of State Heritage Area. As described in Enclosure 1, this area is also recognised as a National Heritage Place which is currently on Australia's Tentative World Heritage List.	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. As outlined in Section 2.2 and Table 2.1 of the PD, the primary access route to site will be from the Barrier Highway, utilising existing roads. Two access roads are included – White Hill Road and Belcunda Road. Site access roads will require widening in some locations and trimming of taller vegetation (limited to amenity vegetation only) to accommodate the transport of heavy machinery and large infrastructure components. The Disturbance Footprint includes areas at several intersection upgrade locations along the Barrier Highway to allow for upgrades and blade sweep. This represents estimated areas where vegetation clearing and/or trimming may be required for the transport of equipment to site. An 11 m wide corridor has been allowed for, noting that this includes the existing 7 m wide road, and that the site access roads are currently undergoing further design development in consultation with the Council and will likely be less than 11m. Neoen does propose to use Copperhouse Road which is the heavy vehicle bypass for Burra and there will be road alterations required at this corner on Copperhouse Road. Neoen assessed the vegetation at this location and it was deemed to be non-native vegetation and therefore not included in the Native Vegetation Clearance application. In terms of heritage values, the impacts at this state owned site are limited to only be tree trimming, or at worst, removal of one single (introduced) pepper tree. Heritage Consultant Biosis advised that this tree was likely planted for shade during settlement like most of the older pepper trees and determined that given there are no records of significance and there is no plaque on the tree, its trimming or removal would not be deemed a significant impact to heritage values. This is summarised in the Heritage Impact Aassessment report (refer Attachment 7 of the PD). No other road alternations are proposed in or around Burra, except for upgrades proposed at site entrance and elsewhere along the route to site spanning back to Port Adelaide. The Route to Site survey can be shared with community if helpful.	No change to PD required.	Not applicable.
		NV Act application	Formal government comments - State Matters (Attachment A)	Comment/ reference 3 Any clearance applications must be made pursuant to the Native vegetation Act 1991 to the Native Vegetation Council	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. Statement noted. Native Vegetation applications have been submitted, and approval received, for the GNWF.	No change to PD required.	Not applicable.
		HRE Act application	Formal government comments - State Matters (Attachment A)	Comment/ reference 4 Neoen has submitted an application under the Hydrogen and Renewable Energy Act 2023 for a Renewable Energy Infrastructure Licence which is under assessment at the Department for Energy and Mining	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. Statement noted.	No change to PD required.	Not applicable.
		Aboriginal Heritage Act application	Formal government comments - State Matters (Attachment A)	Comment/ reference 5 The application made by Neoen to the Aboriginal Affairs and Reconciliation Division of the Attorney General's Department for authorisations under sections 21 and 23 of the Aboriginal Heritage Act 1988 is currently being consulted on and pending a decision from the Minister of Aboriginal Affairs.	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. Statement noted.	No change to PD required.	Not applicable.
		Prescribed Wells Area	Formal government comments - State Matters (Attachment A)	Comment/ reference 6 The Project Area is not located within a Prescribed Wells Area or Prescribed Water Resource Area. From the documentation provided, DEW understands water supply for construction and maint. Purposes is being investigated, including local gw supplies. Water supply requirements will incl. a concrete batching plant for construction and operation is anticipated to be accessed at the site through transportation tanks at various facilities. The viability of a number of privately owned gw bores across the Project Area is currently being investigated.	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. Statement noted. The bulk of the water demand is during construction phase. Neoen are currently finalising a groundwater study to inform potential use of groundwater, should a sustainable supply be determined. A portion of the water required during construction is for the production of concrete which requires a quality that is acceptable for concrete batching. Pending the results of the groundwater study, carting this requirement in from Burra to meet this portion of the water demand as a minimum could emerge as the most viable option.	No change to PD required.	Not applicable.
		Burra Creek and Burra Creek Catchment	Formal government comments - State Matters (Attachment A)	Comment/ reference 6 The proposed OTL is discussed as crossing at Burra Creeek. Burra Creek wetlands near Worlds End are briefly discussed as a baseflow dependent wetland currently described by SA EPA as being in fair condition. DEW states please note the following regarding Burra Creek Catchment: - The Burra Creek Catchment is the only tributary from within the SA Murray Region considered connected to the River Murray. - Consequently, North and South Burra Creek Catchments are collectively listed as a Priority Environmental Asset within the Murray Darling Basisn Plan (Matt 8 asset). This requires the SA Government to report on every 5 yrs on the achievement of environmental outcomes as an asset scale under the Basin Plan. - The last Matter 8 was released in 2024 (link provided in Attachment). - DEW notes that the report states OTL is proposed to cross over Burra Creek, however no impacts are anticipated. We note the report also states that any potential localised impacts as a result of the Project will be mitigated through the CEMP/ OEMP and associated erosion and sediment control measures. Further the report is unclear as to whether the western margin of the WF intersects the northern Burra Catchment as described in Matter 8 report, and if so whether impacts have been considered. - The applicant correctly notes a Water Affecting Activity Permit may be required for construction of access tracks along creek lines. DEW understands Neoen will implement standard sediment/ erosion control procedures as part of CEMP which will ensure that actions will not alter natural flow of water within the Project Area and mitigate against sediment and erosion occurring, particularly around creek lines. DEW suggests that on this Preliminary Assessment, these plans consider potential impacts to the Burra Creek Catchment with respect to the area defined as Priority Environmental Asset under the Murray Darling Basin Plan. Future consultation with DEW members familiar with Matter 8 issues is recommended.	Comments received from Government of South Australia in Attachment A (to the letter received on 24 November) specifically relate to "State Matters" which are relevant under the National Parks and Wildlife Act 1972, the Aboriginal Heritage Act 1988, the Landscapes SA Act 2019 and the Heritage Places Act 1993. They do not specifically relate to matters protected under the EPBC Act 1999 and are therefore not specifically relevant to the assessment of the GNWF being undertaken by DCCEEW through the Preliminary Documentation and supporting documents. Neoen acknowledges that the North and South Burra Creek Catchments are collectively listed as a Priority Environmental Asset within the South Australian Government's Murray Darling Basin Plan (listed as a Matter 8 asset). The PD documents that the Burra Creek connects to the Murray River near Morgan, provided in Section 8 Impacts to Non-Ecological MNES and Table 8.1 SIA for Other MNES listed under the EPBC Act. Neoen acknowledges that should any localised impacts occur it would be expected these would remain within the GNWF Project Area, and consequently would not impact the broader Burra Creek Catchment. Neoen commits to ongoing engagement with DEW regarding the Matter 8 issue (Priority Environmental Asset) identified, and note that Neoen will be required to obtain a Crown Land Licence for construction access via DEW to do any construction on land around Burra Creek, as was required for the Goyder South Wind Farm OTL. Neoen have aligned the Goyder North OTL tower placement with the Goyder South OTL and both avoid impact to Burra Creek. Neoen acknowledges DEW's statement that the Project Area is not located within a Prescibed Wells Area or a Prescribed Water Resource Area.	No change to PD required.	Not applicable.

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Attachment 1 Public Comments Received

[redacted]

From: [redacted]
Sent: Tuesday, 18 November 2025 2:20 PM
To: [redacted]
Subject: FW: Goyder North Windfarm consultation
Attachments: Native-vegetation-submission-form (1) words #1.pdf; Conservation Advice for Tiliqua adelaidensis 2023.pdf

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From: [redacted]
Sent: Tuesday, 18 November 2025 11:49:21 am (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Subject: Goyder North Windfarm consultation

Hello NEOEN

Please see attached submission documents related to your EPBC referral public consultation.

You will see that my submission is basically my submission to Native Vegetation Council a few months ago on the project minus a couple of typos and including relevant Pygmy Bluetongue conservation document from 2023..

I am aware of the modifications to the proposal from earlier this year changing some tower locations. The changes do not alter my concerns.

I am happy to provide any additional information if you have any requests.

Kind regards

[redacted]

Representations to Native Vegetation Council regarding native vegetation clearance applications

Submission Form

Government of South Australia

Native Vegetation Council

You're invited to submit your views on applications to clear native vegetation.

Under the *Native Vegetation Act 1991* and *Native Vegetation Regulations 2017*, any person has the right to make representations in writing to the Native Vegetation Council in relation to the granting or refusal of consent to an application to clear native vegetation, within 28 days of receiving the application. The Native Vegetation Council will consider all representations made by the date published on its webpage. Late submissions may not be considered.

If you have any questions or require assistance completing this form, please contact the Native Vegetation Branch on (08) 8303 9777 or email nvc@sa.gov.au.

Name of clearance application that you are responding to:

Goyder North Stage 1 and Stage 2 Wind Farm

Your details

Name [redacted]	
Organisation	
Phone number [redacted]	
Email [redacted]	
The Native Vegetation Council follows the Premier and Cabinet Circular on Information Privacy Principles when collecting, using and disclosing personal information. All submissions will be provided in full to the Native Vegetation Council for consideration. A summary, a part/s of, or full submission may be provided, if requested, to the applicant or members of public, however, your personal information will not be disclosed.	☒ I understand and accept how my submission will be used and disclosed. *If you have any questions about how your personal information will be handled, used and disclosed, please contact the Native Vegetation Council's Secretary on email provided at the end of this form.*
Are you happy to be contacted by the Native Vegetation Branch to discuss your submission?	Yes Preferred time and method of contact Any time. Email or phone
Would you be interested in presenting your submission to the Native Vegetation Council if invited?	Yes

Comments in response to application

Please note: It is not compulsory to answer all of the questions. We recommend that you concentrate on the questions that you can confidently answer and leave the others blank.

1. Please provide a brief summary of the main reasons you are making a submission.

I am in favour of wind farm and other large scale renewable energy projects in South Australia. This does not need to be at the expense of remnant native vegetation, particularly Critically Endangered Irongrass Native Temperate Grassland. The impacts on native grasslands in the first wind farm at Snowtown were low – small areas for tower pads and modest impacts of tracks and transmission lines. Some more recent ones such as Goyder South appear to have much larger footprints and higher impacts. Some of the landscape impacts are also much more dramatic. The major increase in size and height of the towers is a significant factor. What needs to change is selection of areas and sites so that environmental negatives are minimised.

The Goyder North windfarm proposal has major impacts on Critically Endangered Irongrass Native Temperate Grassland. This involved direct clearance of around 12 ha permanently and 18 ha "temporarily" that "will be allowed to regenerate following clearance required for construction." Umwelt EBS report p 111. The report says that it is not feasible to avoid such clearance. Further there is a major impact in fragmenting the identified areas of Critically Endangered Irongrass Native Temperate Grassland because of the access tracks involved. It is unacceptable if such impacts are allowed to proceed.

Data presented – do we know what is the real position?
The Umwelt EBS report states that conditions for assessment meant that it was difficult to tell how much of the area containing Irongrass would be protected as Class B or Class A as opposed to Class C. This is made more difficult by the grazing impacts on the area which will hide the presence of many species. In my view Class C land should also be given consideration.

My experience with on ground checking a few consultant reports on Irongrass grassland or other grassland ecosystems – Gawler East 2009 and 2012, Gawler East Link Road options c 2016, Marino Irongrass 2017, Twin Creek windfarm 2018 sites related to transmission lines north and east of Truro c 2020, Truro Bypass various areas 2023 is that consultants regularly understate the number of species present. For example, in the case of Gawler East 2009 – report about 25 species, my on-ground c. 50, Gawler East Link Road more than double numbers on my count, Truro Bypass 2023 irongrass area in eastern part of bypass proposal more than double my count c.f. consultant species numbers. The reasons for this are various – timing of surveys with a lot in late summer, autumn when many annual plants not showing up and grasses are hard to identify to species, lack of specificity on grass species – especially lots of Austrostipa sp. Rytidosperma sp. And frankly what looks like a lack of effort to find species. When I have undertaken species recording for grassland sites, I have made a point of visiting sites at least 2, 3 or more times and the results have invariably been substantial increases in species recorded.

With windfarms the areas are large and there has now been established a pattern of not reporting too much detail for quadrats or wider sites. Plus, it seems pretty much impossible for interested commentators to gain access to sites, presumably because of agreements between landholders and wind farm proponents. I don't have any direct additional data to that presented by the Umwelt report. But it would improve the credibility of the process a lot if there were appropriate reporting of the state of vegetation from sources independent of the proponent and their consultants.

SEB related matters

This statement on page 150 of the Umwelt report shows a level of misunderstanding that throws the whole assessment of SEB into question.

7.6 Environmental Benefits
Key outcomes from the Project include the continued improvement of grassland, shrubland and woodland including two areas identified as nationally threatened ecological communities, through implementation of key management actions listed below:

- *Removal of stock grazing: the land has been historically utilised for grazing of livestock. Updates to fencing in SEB Area will ensure permanent stock exclusion from the property.*

Native grasslands require grazing or a substitute for grazing to survive. It isn't perfect but given the lack of appropriate native herbivores now, there is little choice. Slashing and burning are other options but much more expensive in terms of resources. It is hard to believe that a report would make such a fundamental error, at least without providing an alternative. Slashing on the suggested SEB area seems unlikely given the rocky terrain and burning is a resource hungry alternative. We have now had the experience of Terrick Terrick park in Victoria where removal of grazing destroyed the area as habitat for Plains Wanderers for quite a few years until grazing and other management was re-introduced. Mokota suffered the same fate in early years with wild oats and other annual grasses becoming dominant. Para Woodland near Gawler had a similar change of direction after grazing was removed.

Grazing with native animals is now limited because of the removal of many native species. At Mokota native animal grazing is mainly by Eastern Grey Kangaroos which have mostly replaced the traditional Red Kangaroos in the area. Greys are woodland specialists with a lot of grazing of shrubs – hence the problems at Mokota with *Dodonaea procumbens* and other selected shrubs or herbs being grazed to death without intervention. Emus turn up occasionally in dry years but seem to quickly move on.

It also seems likely that the SEB proposal floated for land at Mount Bryan East involves land that is mostly not suited to native grassland.

I have had some experience with creating native grasslands and planting into existing remnant grasslands to restore biodiversity. It is hard work requiring good knowledge of the species involved and a lot of ongoing maintenance. Observing attempts to increase the diversity of native grasslands in the region – most have quite limited objectives in terms of species diversity and most fall well below producing hoped for results. The reasons are many and various – weeds, soil, variable seasons and probably some related to soil fungi and micro-organisms. Accepting low cost offsets such as the $8 million SEB proposed will almost certainly not get anywhere near the sort of environmental gain talked about. Similarly proposing "will be allowed to regenerate" is a recipe for very limited diversity based on species such as Austrostipa and Rytidosperma that are good colonisers, as well as a lot of weeds in disturbed areas. Irongrass Native Temperate Grassland is not going to regenerate well because of the changed conditions we have created on the land. Regeneration will require major resources over many years.

2. Do you consider there are other sites available for carrying out the proposed activity that would result in no or less vegetation clearance and/or impacts on biodiversity? There may be alternative sites on property owned by the applicant, or the applicant could purchase or lease alternative land.

With the lack of long-term knowledge about the management of native grasslands in South Australia's mid north, I don't think any significant destruction of Critically Endangered Irongrass Native Temperate Grassland is acceptable. On any measure this project has an impact that is way beyond minor. The plan could be redesigned to reduce some towers and redirect tracks to remove the impact on Critically Endangered Irongrass Native Temperate Grassland. In talking about impacts on the grassland association, this also covers the associated impact on particular threatened flora species that are in or likely to be in the area and on threatened fauna using the area or potentially using the area. Of particular note is Pygmy Bluetongue Lizards that are closely associated with remnant grassland and Irongrass Native Temperate Grassland.

Recently in 2023 Conservation advice was updated for Pygmy Bluetongue Lizards. Attached are excerpts from that advice that particularly focus on ground disturbance and infrastructure such as windfarms. The advice on windfarms reads like a call for help.

I note the commentary about some threatened bird species.
Plains Wanderer.
"Unlikely - grasslands in the Project Area are highly disturbed by grazing and unlikely to be suitable."
I don't agree with that statement - Plains Wanderers have been very happy to live in grasslands with grazing. In fact, they have been recorded as leaving areas when grazing has not been maintained e.g. Terrick Terrick area in Victoria. The Goyder North area with almost all grazing rather than mixed grazing and cultivation like many Mid North grassland remnants is an ideal area for Plains Wanderers to utilise.

Australian Bustard. "Possible - uncommon migrant in ideal seasonal conditions."
"Not identified in PMST or BDBSA search"

There are Bustard records in the general locality and the area they would be able to use the area without requiring "ideal seasonal conditions".

Generally the Goyder North area is very isolated – no surprise that there are limited recordings of fauna using the area, especially of rarer species.

Also of note the Goyder North stage 3 also contains significant areas of Critically Endangered Irongrass Native Temperate Grassland. It is essential to establish protection in stages 1 and 2 to avoid further impacts in stage 3.

I'm not sure if anyone else will be reporting the results on Pale Sun Moth searching over recent weeks as part of assessment for conservation listing. Whereas previously the only known population in South Australia was near Gumbowie, searching over recent weeks has located scattered populations near Gumbowie and further south to Eudunda and Truro [my area of involvement] in remnant native grasslands. Several populations were found in the general Goyder North area including at Mokota, Wandallah – Tiliqua reserve area and Burra School farm. Generally, Pale Sun Moth seem to inhabit areas with similar characteristics required for Pygmy Bluetongue Lizards. The interesting result is perhaps indicative of the lack of knowledge of invertebrates and the need to be cautious when allowing vegetation clearance, roads etc.

3. How do you consider the size, design or construction method of the proposed activity could be changed to prevent or reduce impacts on biodiversity? This may include removing elements of the development that will have unacceptable impacts.
Do not allow impacts on Irongrass Native Temperate Grassland.

4. What other actions do you think could be undertaken by the applicant and its contractors during the construction and undertaking of the proposed activity to prevent or reduce impacts on biodiversity?
Avoid all permanent and temporary impacts on Irongrass Native Temperate Grassland.

5. Do you think there are any other measures that could be adopted by the applicant to prevent or reduce clearance of native vegetation and/or impacts on biodiversity?
Change the project design to avoid towers and tracks in Irongrass Native Temperate Grassland.

6. Do you think the applicant has adequately demonstrated how they will undertake the ongoing monitoring and management of issues associated with the proposed activity, such as weed and pest invasion? If not, what other actions should the applicant commit to?

No. Probably something like $100 million in a trust fund would be adequate to produce a long term and ongoing good outcome. Much cheaper to change plans.

7.	Do you think the applicant has adequately demonstrated that they can re-instate vegetation as much as possible through restoration activities once the proposed activity has ceased? If not, what other actions should the applicant commit to?

No.

8.	Do you think there are other opportunities for delivering the required Significant Environmental Benefit offset (if applicable) that would produce better environmental outcomes?

Not really – the best solution is to avoid the damage.

9.	Please provide any additional records or anecdotal evidence on the flora and fauna located in the clearance area that the Native Vegetation Council should consider when reviewing the application.

The Heritage Agreement area 1551 adjoining the proposed SEB area has Ptilotus angustifolius - State Endangered species, present. Could well be on nearby properties as well.

10.	If you believe that clearance consent should not be granted, please outline your reasons and provide any additional information available to support your position.

Reasons above. This area has not had the level of clearance for cropping that has occurred in a lot of similar areas. As such it needs very careful consideration before approving such a project. Relocating towers and roads away from areas of current good value native vegetation would help but still has issues with fragmentation and likely impacts on conservation rated flora and fauna species.

Background

I have been involved in observation and assessment of remnant native vegetation including native grasslands for many years. My involvement has included searching out remnant grasslands in Lower North and Mid North regions, particularly since 2007.

This included providing information to consultant assessing Gawler East residential proposal in 2008 that the site included an area of about 2 hectares of EPBC listed Irongrass Native Temperate Grassland [EPBC listed 2007] that was not included in the first 2 reports prepared by the consultant. The result was an EPBC referral [including Flinders Ranges Worm-lizard that the consultant had included]. The consultant report classified the area as Class B. My assessment of the site was that the site had about double to species listed by the consultant making it a Class A area. A detailed submission on the EPBC referral of Delphin Gawler East land development was made and the Commonwealth Department required significant work to be undertaken to conserve the area – still ongoing issues, however.

Partly as a result of my input, the map for INTG was expanded on 2 occasions to include the area around Gawler but also bigger areas in the Hummocks Range and parts of Yorke Peninsula.

In 2013-2015 I helped oversee and write report for "A Biological Survey of Lower North Grasslands of South Australia survey 836. Some details on Naturemaps. Included a number of areas or INTG and other grasslands. As part of this work and followup, grassland sites with in excess of 100 species present at Bagot Well and Dutton were recorded, and sites with more than 60 species at Gawler and Freeling. As well as much less diverse vegetation and condition.

In 2015 I contributed a brief report on Mokota Conservation Park management in Nicholas S G Williams A M and Morgan J W "Land of sweeping plains" – a book on grasslands of south-eastern Australia published by CSIRO.

Since 2019 I have been coordinating the re-establishment of an area of about 2 hectares of Council reserve under the 132 KVA powerline [ex farming land] at Gawler East. Some 100 native grassland species have been direct seeded and handplanted in the central 1 hectare high diversity area] with varying success.

Since 1998 I have managed the Gawler Environment & Heritage Association native plant nursery, producing over 200,000 plants and 200 plus species. This has included some 12 years of Understorey Project and about 40,000 plants of 100 species concentrating on grasses, daisies, lilies, groundcovers and other small native species – most of which make up understorey of grasslands and grassy woodlands that dominated the original vegetation in our region.

Since 2020 I have coordinated a conservation plan and restoration work for a 6 hectare area of remnant Irongrass grassland at Ardrossan parklands. We have doubled the number of native species recorded in the area to over 100 and surveyed many remnant sites in the locality including finding the largest known patch of *Leptorhynchos elongatus* [in the world] on private land.

About 4 years ago I assisted the owner of HA 1551 near the proposed SEB land with a vegetation survey of the block.

More recently I have completed a 2 year term as a Northern and Yorke Landscape Board member, including initiating a 4 year Board project to monitor invertebrates in grasslands in the region in conjunction with Gawler Environment & Heritage Association as community supporter. The project in year 1 has made the first comprehensive attempt to document invertebrates on grassland sites from Truro to Peterborough, including at Burra School farm and Mokota Conservation Park in the vicinity of the Goyder North windfarm proposal. The results of year 1 are not available yet, but based on preliminary assessment by entomologist Alex Stolarski, the diversity of species is high, especially given a very dry year. Many of the species collected will be un-named and quite a few may be new to science. The gaps in knowledge about invertebrates in grasslands are considerable.

Other people would be more familiar with the vegetation in the area of the Goyder North windfarm. My experience is limited to a number of visits to Mokota Conservation Park, Tiliqua Nature Foundation Reserve, a spring drive about 5 years ago through from Mokota to Wandallah and Burra via access tracks and Wandillah Road, and walking some Heysen Trail sections in the area and recording plants on HA 1551.

Declaration

☒	I hereby certify that to the best of my knowledge the information provided in this submission is complete and correct and no information is false or misleading.

Lodging your form Send your completed submission to the Native Vegetation Branch via:

Email: nvc@sa.gov.au Post: GPO Box 1047 Adelaide SA 5001

Appendix **Conservation Advice for *Tiliqua adelaidensis* (pygmy blue-tongue lizard)**

In effect under the *Environment Protection and Biodiversity Conservation Act 1999* from 31 August 2023.

Excerpts page 12, 13

Threat	Status [a]	Evidence
Habitat loss and degradation		
Changed land use for agricultural activities	• Status: historical/current/ future • Confidence: observed • Consequence: catastrophic • Trend: increasing • Extent: across entire range	Changes in land use, particularly changes that permanently alter large or contiguous areas of habitat, are a key threat to pygmy blue-tongue populations (Duffy et al. 2012). Given the small number of subpopulations and the very restricted AOO of the species, the loss or reduced viability of even a single subpopulation could have significant implications for the long-term survival of this species. Tilling is a very significant threat to the species as it will directly kill and displace the lizards, their prey items, and their co- existing burrow-making spiders (Thorbek & Bilde, 2004; Stašiov et al. 2010; Duffy et al. 2012). Given persistent spider holes require hard-packed soil to persist, burrows quickly erode when soil is tilled. Even if a paddock is only tilled once and left to regenerate naturally, the original lizard population will be lost, and occupancy will be inhibited (Duffy et al. 2012). Ripping is slightly less detrimental than tilling if tracts of soil are left undisturbed but would destroy lizards and their burrows in the direct path of the ripping lines (Duffy et al. 2012). Ripping and tilling ultimately lead to habitat loss and may also promote weed establishment.

Threat	Status	Evidence
Urban, industrial and infrastructure development	• Status: historical/current/ future • Confidence: observed • Consequence: major • Trend: increasing • Extent: across entire range	Pygmy blue-tongue population sites, particularly those close to Burra, are threatened by future urban, industrial development including the establishment of buildings, roads, wind farms and associated infrastructure, and telecommunications infrastructure. Such development may result in the excavation of pygmy blue-tongue habitat areas, the use of heavy machinery leading to the compaction of soil, and soil runoff from development sites into burrows (Duffy et al. 2012). Development can also cause changes to hydrology from extra water run-off which could impact the soil structure and vegetation compositions of pygmy blue- tongue habitat (Duffy et al. 2012). Three subpopulations near Burra are already believed to have been lost due to land use change, and a further two more are suspected to be extinct (Duffy et al. 2012, Fenner et al. 2018; Bull & Hutchinson 2018).

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 7:10 PM
To: [redacted]
Subject: FW: submission re EPBC referral public consultation about the endangered Pygmy Blue Tongue Lizard
Attachments: submission re Goyder referral to the EPBC endangered Pygmy Blue Lizard.docx

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From: [redacted]
Sent: Wednesday, 19 November 2025 4:38:57 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Subject: submission re EPBC referral public consultation about the endangered Pygmy Blue Tongue Lizard

RE: The invitation for comment about the referral of endangered Pygmy Blue Tongue Lizard [PBTL] to the EPBC Act

Please see attached submission documents related to your EPBC referral public consultation about the endangered Pygmy Blue Tongue Lizard / Skink

You will see that my submission is similar to my submission to Native Vegetation Council re proposed Goyder Stage 1, stage 2, and the intended stage 3 Wind Farm a few months ago. To my knowledge, there has been no improvement to the status of the endangered Pygmy Blue Tongue Lizard [PBTL] in this period.

I am happy to provide additional information if you have any issues.

Kind regards

[redacted]

EPBC referral

Email: contact@goyderenergy.com.au

[redacted]

Email: [redacted]

18/11/2025

Submission re referral of endangered species on the proposed Goyder Wind Farm to EPBC

To the EPBC referral

BACKGROUND

PART 1

Principles for protecting species and communities

% of Existing Threatened Community

Scientists generally consider that 30% of any habitat is required for long term health.

It is estimated (REF) that only 1% of the ITNG remain in the mid-north.

Therefore, It is unacceptable to place any wind farm and wind farm infrastructure in any ITNG in the mid-north.

As an obligate grassland species, the nationally endangered pygmy blue-tongue skink (Tiliqua adelaidensis) or pygmy bluetongue [PBTS] will be severely affected by any reduction in the already endangered Iron-grass Natural Temperate Grassland within the proposed Goyder Wind Farm.

The major issue in this application is the presence, in the proposed location of this wind farm in Stage 1, Stage 2, AND Stage 3, of the ***Nationally Critically Endangered ecological community*** known as **Iron-grass Natural Temperate Grassland of South Australia** (INTG) under the EPBC Act and the presence of many threatened species of flora and fauna.

Importantly, the proposed Stage 3 should be taken into consideration ***at the same time*** because the vegetation communities including about 60% Lomandra grasslands (my estimate from the maps) are similar and the disturbances are similar.

This ecological community Iron-grass Natural Temperate Grassland once extended over an estimated 750,000 to 1,000,000 hectares (Specht 1972; Hyde 1995). However, the ecological community has declined dramatically … The area of Iron-grass Natural Temperate Grassland of South Australia which meets the EPBC Act condition criteria is unknown but is likely to be less than 5,000 ha [5-6% of the original] (Hyde, 1995; Threatened Species Scientific Committee 2007).

From the Approved Conservation Advice (s266B of the Environment Protection and Biodiversity Conservation Act 1999) Approved Conservation Advice for Iron-grass Natural Temperate Grassland of South Australia we note that:

- The Iron-grass Natural Temperate Grassland of South Australia ecological community ***occurs over a range of, at most, 5000 ha*** or less than 5% of the pre-European settlement distribution.
- The main identified threats to Iron-grass Natural Temperate Grassland of South Australia are ***land clearing, grazing and weed invasion***.
- The main potential threats to Iron-grass Natural Temperate Grassland of South Australia include agricultural snails, inappropriate tree planting, road and rail maintenance activities and ***the effects of fragmentation*****.** (TSSC, 2007).

SUMMARY: This is an extremely rare ecosystem threatened by clearing, grazing, weed invasion and fragmentation.

PART 2

IN ADDITION to the critically endangered ecological community INTG the proposed area contains populations ***of Endangered, Threatened and Vulnerable FAUNA*** including being a stronghold for the ***nationally endangered pygmy blue-tongue skink (Tiliqua adelaidensis) or pygmy bluetongue***,[PBTS] listed as Endangered nationally under the EPBC Act, and Endangered in South Australia under Schedule 7 of the National Parks and Wildlife Act 1972. (ref 2) which co-exist in the INTG.

The Conservation Advice for Tiliqua adelaidensis (pygmy blue-tongue lizard) In effect under the Environment Protection and Biodiversity Conservation Act 1999 from 31 August 2023 lists the 2 greatest threats to include

1) tilling and ripping of the soils.
2) Industrial and infrastructure development including wind farms.

Threats in Table 1 are noted in approximate order of highest to lowest impact, based on available evidence.
Page 11 and 12 (ref 5 below)

Tiliqua adelaidensis (pygmy blue-tongue lizard) Conservation Advice

Threat 1 highest	Status [a]	Evidence
Habitat loss and degradation		
Changed land use for agricultural activities	• Status: historical/current/ future • Confidence: observed • Consequence: catastrophic • Trend: increasing • Extent: across entire range	Changes in land use, particularly changes that permanently alter large or contiguous areas of habitat, are a key threat to pygmy blue-tongue populations (Duffy et al. 2012). Given the small number of subpopulations and the very restricted AOO of the species, the loss or reduced viability of even a single subpopulation could have significant implications for the long-term survival of this species. Tilling is a very significant threat to the species as it will directly kill and displace the lizards, their prey items, and their co-existing burrow-making spiders (Thorbek & Bilde, 2004; Stašiov et al. 2010; Duffy et al. 2012). Given persistent spider holes require hard-packed soil to persist, burrows quickly erode when soil is tilled. Even if a paddock is only tilled once and left to regenerate naturally, the original lizard population will be lost, and occupancy will be inhibited (Duffy et al. 2012). Ripping is slightly less detrimental than tilling if tracts of soil are left undisturbed but would destroy lizards and their burrows in the direct path of the ripping lines (Duffy et al. 2012). Ripping and tilling ultimately lead to habitat loss and may also promote weed establishment.

Tiliqua adelaidensis (pygmy blue-tongue lizard) Conservation Advice

Threat 2 highest	Status [a]	Evidence
Urban, industrial and infrastructure development	• Status: historical/current/ future • Confidence: observed • Consequence: major • Trend: increasing • Extent: across entire range	Pygmy blue-tongue population sites, particularly those close to Burra, are threatened by future urban, industrial development including the establishment of buildings, roads, wind farms and associated infrastructure, and telecommunications infrastructure. Such development may result in the excavation of pygmy blue-tongue habitat areas, the use of heavy machinery leading to the compaction of soil, and soil runoff from development sites into burrows (Duffy et al. 2012). Development can also cause changes to hydrology from extra water run-off which could impact the soil structure and vegetation compositions of pygmy blue-tongue habitat (Duffy et al. 2012). Three subpopulations near Burra are already believed to have been lost due to land use change, and a further two more are suspected to be extinct (Duffy et al. 2012, Fenner et al. 2018; Bull & Hutchinson 2018).

IN ADDITION to the critically endangered ecological community INTG the proposed area contains populations of ***36 Endangered, Threatened and Vulnerable FLORA*** including 8 species are listed both nationally and at the state level and ***30 species with an Endangered, Threatened or Vulnerable rating at the state level***.

IN ADDITION to the impact in the proposed development envelope, this proposal impacts and will have ***flow-on deleterious effects on existing conservation areas*** including HA1264, Mimbara Conservation Park, Redbanks Conservation Park, and abutting 3 sides of Mokota Conservation Park - which is the icon grasslands park in SA. Fig. 4.8 p111 and fig 2.2 page 25 and Figure 4.4,

Figure 4.1 Map 1 of 3 (p90) shows that ***70% of the total area (my estimate)*** to be impacted is ***Lomandra grasslands intermixed with native grasslands.*** A considerable amount of this native grasslands is likely to be a derivation of Lomandra grasslands. There are considerable permanent structures and roadways which fragment this area.

IN ADDITION, the known threats in this proposal will continue into Stage 3 with similar or greater consequences. Figure 4.9 1 Map of Stage 3 (p113) shows that 60% of the total area (my estimate) to be impacted is Lomandra grasslands intermixed with native grasslands.

All of these are listed as actions to be taken in in this proposed development affecting over 500 ha. This cannot be considered "incidental clearing".

SUMMARY: These threats of clearing, grazing, weed invasion and fragmentation occur at community and species level on site and spread out into a number of pre-existing conservation areas.

PART 3

In addition, the native vegetation throughout the Project Area is comprised predominantly of grasslands, with large tracts of Iron grass (Lomandra spp.) in the middle and eastern sections. However, the proposed on-ground SEB protects almost no Lomandra grasslands and the remaining vegetation types (Mallee, sclerophyllous shrubland, and chenopod shrubland) suggest a different soil type not suitable for ITNG. The proposed ***on-ground SEB is not a like-for-like substitution for the endangered Lomandra grasslands*** community under threat. (Figure 7.2. p158)

SUMMARY: The endangered Lomandra grasslands community affected cannot be replaced by the proposed SEB.

These points should be considered before negotiations about levels of Seriously at Variance and monetary sums for a SEB. Ask yourself if the destruction and degradation of a nationally precious habitat is warranted.
Negotiations are often busy work in which the parts and results distract from comprehending the whole. Remember the forest as well as the trees / native grassland meadows.

DETAIL

1. The area contains much of the remaining important areas of one of the most threatened ecological Communities in Australia called Iron-grass Temperate Natural Grasslands of South Australia (ITNG) This ITNG is listed nationally as Critically Endangered under the EPBC Act. Only 1% of the original footprint remains in the state. (ref 1) Scientists generally consider that 30% of any habitat is required for long term health.

2. The critically endangered ITNG protects a wide range of Endangered, Threatened and Vulnerable animals including being a stronghold for the nationally endangered pygmy blue-tongue skink (Tiliqua adelaidensis) or pygmy bluetongue, listed as Endangered nationally under the EPBC Act, and Endangered in South Australia under Schedule 7 of the National Parks and Wildlife Act 1972. (ref 2)

3. The proposed Goyder North Stage 1 and Stage 2 Wind Farm Report lists the presence of a total of 12 Threatened and Vulnerable plant species, of which 8 are listed both nationally and at the state level and 30 species with an Endangered, Threatened or Vulnerable rating at the state level.

4. The proposed Goyder North Stage 1 and Stage 2 Wind Farm Report has plans for a Stage 3 which is likely to be as important or more important in terms of the threatened ecological ITNG community (roughly estimated as over 30% of the area) and threatened species, which should be assessed at the same time. The proposed Goyder North Stage 1 and Stage 2 Wind Farm must NOT be allowed to separate these into separate assessments as a disingenuous mechanism to maximise success for the overall project. Fig 4.9 p113

5. Fragmentation of ecological communities into a number of small areas is a destructive method of damaging the integrity of a plant community. This plan has a spiderweb of roads. Every edge becomes an access for dust, weeds and feral animals such as foxes, cats, and deer. The proposed wind farm will fragment the property into a roughly estimated 40 + areas with a system of 6m wide access roads (roughly estimated at 70 km of wide road plus 7 wide cabling of 40 km) plus smaller access roads. Fig. 2.6, page 30. In addition, the proposed Goyder Wind

Farm will have flow-on deleterious effects on existing conservation areas including HA1264, Mimbara Conservation Park, Redbanks Conservation Park, and abutting 3 sides of Mokota Conservation Park - which is the icon grasslands park in SA. Fig. 4.8 p111 and fig 2.2 page 25 and Figure 4.4

6. Much of the Goyder Report lists most of its own proposed activities as Seriously at Variance with the principles of the Native Vegetation Act 1991 and Native Vegetation Regulations 2017. The report uses Table 4.34 Remnancy Figures for each IBRA Subregion and Environmental Association impacted by the Project and Total Biodiversity Scores (TBS) for each Block. This uses an inappropriate scale for recording the locations of ITNG patches.

7. Damage to 546.36 ha cannot be considered Incidental clearing. Successful restoration of temporarily disturbed endangered communities and other communities cannot be substantiated. The Goyder Report Table 4.2 states that up to 281 ha will be permanently impacted by the development and a further 230 ha will be temporarily affected, a total of over 500ha. It will be rehabilitated following construction where it is reasonable and practical to do so, The Temporary Disturbance areas (230 ha) will be rehabilitated following construction, with the objective of returning the area (where practicable) to native vegetation cover of similar composition, to the pre-disturbance vegetation associations present. No previous successful rehabilitation projects are listed and the technology required is as yet undeveloped. The Goyder Report uses where practical - 4 times, to minimise impact - 10 times, minimise - 21 times, avoid - 46 times, where possible -9 times, reasonable – 3 times. It is estimated that good restoration will cost over $60 m dollars. A SEB payment of SEB of $8,586,127.54 is grossly inadequate.

ANY SEB area will result in a significant loss of habitat. *If* it exists and *if* it is similar to the proposed area to be damaged, then it follows, ***ipso facto*****,** there must be loss of habitat equal to the proposal. If 1+1=2, then then 2-1 = 1.

References

1. Turner, J. (2012). National Recovery Plan for the Iron-grass Natural Temperate Grassland of South Australia ecological community. Dept of Environment and Natural Resources, SA.
2. "Department for Environment and Heritage (2003) Mokota Conservation Park Management Plan, Adelaide, South Australia
3. Duffy, A., Pound, L. and How, T. (2012) Recovery Plan for the Pygmy Bluetongue Lizard Tiliqua adelaidensis. Department of Environment and Natural Resources, South Australia.
4. Goyder North Stage 1 and Stage 2 Wind Farm at https://www.environment.sa.gov.au/topics/native-vegetation/consultations
5. Reference https://environment.gov.au/biodiversity/threatened/species/pubs/1270-conservation-advice-31082023.pdf

[redacted]

QUALIFICATIONS AND EXPERIENCE

I am an ecologist, with a particular strength in botany, holding the degree of B.Sc. (Hons) Botany - First Class (1975) from the University of Adelaide.
I have over 40 years' experience in the identification of native plant species in South Australia, particularly in the Mount Lofty Ranges / Adelaide Region and the mid-north of the state.

I have over 40 years' experience in the assessment of native vegetation in terms of its biodiversity, ecological function (biological balance), nature conservation and in the design of management strategies for native vegetation.
In particular, I have over 25 years' experience in the areas of native grassland biodiversity and assessment of native grassland condition, grass identification, running workshops on grassland management strategies, and presenting courses on grass identification.
I have a working knowledge of avifauna through 25 years' experience in the field identification of birds in South Australia.
I am the author of two books about native plants of South Australia, being [redacted] (1994) It's Blue with Five Petals: Wildflowers of the Adelaide Region. Revised Edition. [redacted] Publishing, Adelaide and [redacted] (1995) It's Blue with Five Petals: Kangaroo Island Field Guide [redacted], Adelaide. [redacted] (2012) It's Blue with Five Petals: Wildflowers of the Adelaide Region. Second Edition.
I have previously held biological science, native vegetation assessment and extension positions in the South Australian government in the Department for Environment and Heritage; and its previous equivalents; that is, Department of Environment, Heritage, and Aboriginal Affairs (DEHAA); the Department of Environment and Natural Resources, and Department of Environment and Planning.
I have undertaken contract work for the equivalent departments in NSW and NT, as well as numerous other organisations, including contract work with the Adelaide Mount Lofty Ranges NRM Board, World Wide Fund for Nature, Burnside Council, and Mount Barker Council.

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 4:29 PM
To: [redacted]
Subject: FW: GNWF - EPBC submission
Attachments: GNWF NEOEN EPBC - [redacted] Submission.docx

From: [redacted]
Sent: Wednesday, 19 November 2025 1:58:14 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Cc: [redacted]
Subject: GNWF - EPBC submission

I am attaching a copy of my submission regarding the visual impact of the GNWF under the EPBC call for public comment.

Thank you,

[redacted]

[redacted]
[redacted]
[redacted]
[redacted]

Mobile - [redacted]
Email - [redacted]

Goyder North Wind Farm Development
EPBC Public Consultation – Personal Submission

Preserve the Empty Horizon

[redacted]

11/2025

I support the development of the Goyder North Wind Farm (GNWF) in many ways, but not the visual impact of turbines to the township of Burra.

Burra enjoys a special place in Australia and the world as a village where you can be immersed in an historic community and landscape. The Burra Conservation Management Plan (CMP) clearly states that Burra's sense of place and the visual setting of the mining sites are of highest significance, and that future development should carefully consider the influence of the landscape including views to and from the Burra Mine and Smelts site (cited in BIOSIS report, p.38). In my reading of the documents prepared by NEOEN and their commissioned specialist reports, the visual integrity of Burra will be forever changed by the visibility of wind turbines, thus diminishing the view and character of the State and National heritage township. Given the moderate risk assigned to the visual impact of the turbines on heritage by BIOSIS, it is possible that Burra's World Heritage bid could be challenged if the GNWF is to go ahead without further modification to the tower array in the southwest corner of the site – the area closest to Burra.

In the NEOEN submission, GBD presents a visual effect grading matrix revealing diverse perceptions on wind turbines across several indicators (GBD, Table 10). From my perspective as a resident and property owner of Burra, the presence of wind turbines presents a high negative visual impact on the township. Even though I understand the detailed planning and modifications that have informed NEOEN's proposed wind farm, I support removal of more turbines so there is no visual impact of the GNWF to Burra township. This is a challenge for NEOEN but one that they acknowledge could be considered for careful review even though it is a very high value wind resource location. I encourage a review with high quality community engagement as part of the process, especially since community concern about the visual impact of the turbines remains high (EPBC, p.23). At this point, I support removal/relocation of turbines 001,002, 003, 004, 005, 006, 013, 014, 015, 016, 017, 020.

There has not been sufficient community consultation/engagement on the matter of visual impact of the GNWF. Though NEOEN has conducted significant stakeholder and neighbor consultation, there has been little direct effort to engage with Burra property owners, businesses and associations. At a lightly attended NEOEN consultation in October 2023, community raised issues regarding visual impact (NEOEN, section 1.4). This matter is still of concern to residents and to heritage tourists who value immersive experiences.

More than 90% of submissions to the South Australian review did not approve of the GNWF in its proposed configuration based on visual impacts, sound impacts, environmental impacts and heritage impacts. I recommend establishing a formal community engagement process with clear and transparent communication, including public meetings with models of the development site and its visual impact on Burra. Though it is late in the planning process, I believe it is possible to come to a middle ground where all parties can be satisfied with the outcome. This may involve removing turbines that impose on the landscape of rolling hills that surround Burra and its nineteenth century "monster mine" heritage site. Doing so would mean that the GNWF development adheres to the intent of the Burra Conservation Management Plan and the principles of the Burra Charter.

NEOEN's continuing rationale for turbine placement is due to high wind values in the GNWF southwest, but I question relying solely on market-driven decision making in this situation. It is hard to see why NEOEN needs these turbines and why the company wants to produce so much wind energy when recent news reports indicate an oversupplied electricity market.

I encourage NEOEN to consider heritage-focused decision making to remove/relocate 12 more turbines and preserve the empty horizon of rolling hills that hold an internationally significant historic mine and the township of Burra. It would be a simple and generous decision, and one with enduring benefits to the community.

[redacted] lives in Burra where she convenes the Burra History Group. She was on the Council of the National Museum of Australia for 6 years and on the Board of the Queensland Museum for 9 years. Her children's art collection is held at the State Library of Queensland and was inscribed in the UNESCO Memory of the World.

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 4:38 PM
To: [redacted]
Subject: FW: Submission: Goyder North Stage 1

From: [redacted]
Sent: Wednesday, 19 November 2025 2:07:23 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Subject: Submission: Goyder North Stage 1

Dear NEON,

The following points are why I object to the continuation of the Goyder North Stage 1 Development:

Environmental Concerns:

Protect the Pygmy Blue Tongue Lizard (Endangered)

As an endangered species of the Mid-North SA region, we are concerned that the proposed development will further endanger the Pygmy Blue Tongue Lizard. (Ref: Pygmy Blue Tongue Lizard*https://www.dcceew.gov.au/environment/biodiversity/threatened/action-plan/priority-reptiles/pygmy-blue-tongue*)

Protect the Southern Hairy-Nosed Wombat (Near Threatened)

The Southern Hairy-Nosed Wombat is in a vulnerable position as a near threatened species and resides in and around the Burra region. We are concerned that the Goyder North Wind Farm will further stress the near threatened population. (Ref: *Submission to EPBC 2024/09929 Goyder North Wind Farm*, [redacted], local ecologist)

Protect the Biodiverse Grasslands of the Mid North SA Region (Threatened)

The grassland biodiversity of Burra and the Goyder North region is already threatened. We are concerned that the Goyder North Wind Farm will further stress the grasslands species.
(Ref: *https://www.landscape.sa.gov.au/mr/projects/native-species-projects/all-projects-map-iron-grass-native-grassland-project*)

Burra's local environmental experts need to be consulted on this matter and their knowledge and experience respected.

*****ANY* level of risk to the survival of our endangered and threatened flora and fauna is totally unacceptable.*****

CULTURAL CONCERNS

Protect the Ngadjuri Aboriginal Sacred Sites of the Mid North SA Region

The Goyder North Wind Farm is proposed to be built on Ngadjuri Country. We are concerned that there has been little consultation regarding the Ngadjuri sacred sites and storylines that weave through the region proposed for the northern development. (See: Ngadjuri Spirit and Songs of Country, Quenten Agius, 2024, https://vimeo.com/1023834247

Consultation needs to be conducted with Ngadjuri people who have been taught the song-lines and stories of these lands (e.g., Uncle Quenten Agius). It is they who have the knowledge of the sites that can potentially can be destroyed by the Goyder North project and those that have already been allegedly destroyed during the Goyder South Wind Farm development.

*****ANY* level of risk to Ngadjuri sacred sites, story and song-lines is totally unacceptable.*****

BURRA HERITAGE & VISUAL CONCERNS

Protect the Visual Impact of Wind Turbines on the Heritage Township of Burra

Burra is currently on the tentative list for UNESCO World Heritage status. It is already both a State and a National Heritage listed township due to its extensive historic architecture and landscape. We are concerned that the proposed Goyder North Wind Farm will destroy the visual integrity of Burra and will forever change the landscape surrounding the heritage township.

We are now led to believe that UNESCO World Heritage has approved turbines being located in areas close to Burra. I find that approval unacceptable due to the visual pollution caused by the sight of turbines from the Burra township.

Previously, I was promised by a NEOEN representative that turbines associated with the Goyder South Project would not be visible from the centre of Burra but as photographic evidence displays, that was a false promise (see photograph below).

We are now told by NEOEN representatives that turbines behind Burra would only be visible from elevated sites around Burra including the top steps of the Burra Town Hall and the Monster Mine Site - both State and Federal Heritage sites. Frankly, when I'm told this by NEOEN, I am distinctly disinclined to believe them.

*****ANY view of wind turbines anywhere from within the Burra Heritage town is totally unacceptable*****

I don't want to see any more of these blights upon the landscape of Burra's heritage town.

BURRA COMMUNITY OPINION

Allegedly, at the Tribunal on the Goyder North project a presenting member suggested that the Burra community was happy with the development going forward.

I find that perplexing because the Burra community **has never been offered a Town Hall community meeting** to discuss the wind farm development (either South or North). Instead, short hours of community consultation were offered in Burra's NEOEN office and we were bombarded with a bucket load of documentation (as we are for this consultation). General community members should not be expected to plough through these documents - nor would they be likely to. When I and my colleagues asked for a community town hall meeting a few months back to discuss the Goyder North development, the answer from NEOEN staff was a resounding NO.

********For these reasons I REQUEST a COMMUNITY TOWN HALL MEETING to discuss the Goyder North Project IMMEDIATELY - this will indicate to the community that NEOEN is willing to engage in the professional and responsible process of true engagement and community participation in decision making.********

WHAT'S IN IT FOR BURRA

The Burra community and surrounds have never been asked what we wanted should we have to suffer the degradation of the Wind Farms surrounding our town.

The community has ideas - one of which is a town Battery to help power all homes in Burra. That idea was explored by NEOEN but the answer was a resounding NO.

In an open Town Hall consultation, I'm sure the community would come up with other ideas.

The NEOEN community fund offered over many years, giving out small grants, is NOT an idea way to support the community with local community groups having to compete and beg for support. Our opinion of what we wanted from NEOEN was never requested. I believe there are bigger and better ways to support local communities than the 'drip by drip' small project approach. Ask the community - they will tell you what they want.

That concludes my Submission. Thank you for this opportunity.

[redacted]

I acknowledge the Ngadjuri people, the traditional custodians of the country upon which I reside. I pay my respects to their culture and Elders past and present.

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 2:58 PM
To: [redacted]
Subject: FW: Comments on Preliminary Documentation for Goyder North Stage 1
Attachments: GoyderNthEPBC.pdf

_____

From: [redacted]
Sent: Wednesday, 19 November 2025 12:27:13 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au
Subject: Comments on Preliminary Documentation for Goyder North Stage 1

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

To Whom it May Concern,

Please find attached my responses to the EPBC documentation for Goyder North.

Sincerely,

[redacted].

[redacted]

November 19, 2025

Goyder Energy
Neoen
contact@goyderenergy.com.au

Dear Sir/Madam,

RE: EPBC No. 2024/09929. Goyder North Renewable Energy Facility Stage 1 Project.

I am a botanist with field experience in the native grasslands of the Burra district, having assisted on surveys in Mokota Conservation Park and remnant grasslands in the Barossa and Mid North. I am writing to express my concerns regarding the proposed Goyder North Renewable Energy Facility (hereafter 'Project Area').

Several related bodies of ecological research – fragmentation theory (Fahrig 2003, Haila 2002), metapopulation theory (Hanski 1998), and landscape ecology (Turner 1989) – are germane to this proposal. Each is supported by extensive empirical evidence collected in numerous studies across continents. This evidence indicates that the effects of habitat fragmentation vary and are hard to predict, as they are contingent on ecological context and the characteristics of the species involved. Nevertheless, some broad conclusions can be made.

Haila (2002) states habitat fragmentation is best considered as a specific form of habitat degradation, one of the 'types of harmful changes induced by human activity'. He offers several rules of thumb, including:

1. *"Avoid clearing native habitats, particularly in regions where this has already happened to a large degree.*
2. *Cherish corridors and other connecting habitat in heavily cleared landscapes…*
3. *Identify particularly important microhabitats…and preserve these both within and outside preserves."* (Haila 2002).

Neoen's revised plans make a few token concessions consistent with Haila's rules, yet there is little indication of any real commitment to keeping habitat loss to a minimum. For example, by far the largest portion of the Project Area's Disturbance Footprint – almost 85% (Table 1.5, p. 9, Umwelt 2025a) – is occupied by

native vegetation. And around 40% of that is to be 'temporarily' disturbed to provide assembly and construction areas. I understand there is flexibility in siting these areas, yet it appears little effort has been made to use that flexibility to reduce impacts. Further, the proposed rehabilitation 'via speading of topsoil' (p. 9, Umwelt 2025a) is more likely to encourage invasive species than to restore disturbed plant communities: 'temporary' may become permanent.

Pygmy Bluetongue Lizard (PBTL) Neoen claims their PBTL management plan aims to *'Avoid and minimise impacts to PBTL individuals and their habitat…'* (p. 6, Umwelt 2025b). However, my impression is that Neoen is putting more effort into managing perceptions about the adverse effects of their proposed activities than into minimising PBTL impacts.

Umwelt (p. 23, 2025b) states that 368 ha of known and likely PBTL habitat stands to be directly impacted by the Project, affecting over 200 lizards – possibly as many as 274 (Table 4.1, Umwelt 2025b). This is a very high level of disturbance, especially for an endangered species that was thought to be extinct for decades.

Neoen makes no attempt to outline the consequences these direct impacts may have on the lizards: whether it will entail loss of body condition, reduced fecundity, or increased mortality rates. This is surprising given all the research into PBTL on wind farms over the last 15 or so years. Surely enough is known to provide ballpark estimates of mortality and fecundity so that the impacts of the Goyder North Proposal can be better assessed. And if Neoen are unable to provide these data I would seriously question whether the Goyder North Proposal should be entertained at all: there's too much at stake.

Additional 'indirect' impacts are listed but not quantified (Table 4.2, Umwelt 2025b). These include damage and destruction of PBTL habitat with associated PBTL mortality, which implies that Neoen's stated Disturbance Footprint is an understatement of the actual disturbance footprint. Further, I do not understand why Neoen has labelled loss of PBTL habitat and PBTL mortality due to clearing or being run over by vehicles as 'indirect' impacts: identical events a few metres away would be classed as 'direct' impacts. This strikes me as perception management, not full disclosure.

I note the area of Likely and Known PBTL habitat in the Disturbance Footprint is double the area of Unlikely/Unsuitable habitat (Table 4.2, Umwelt 2025c). How is this consistent with Neoen's stated objective of minimising habitat impacts? If Neoen was committed to minimising impacts, would not there be a higher proportion of Unlikely/Unknown habitat in the Disturbance Footprint?

Metapopulation theory sees populations as occupying a set of habitat patches across a landscape (Hanski 1998), usually comprising a core 'source' population and some smaller 'sink' populations that depend on immigrants from the source

in order to persist. The chance of migration is greater over short distances or for highly mobile species. The chance of a patch becoming extinct is higher for smaller populations and for remote patches that receive few immigrants.

This provides a guide for assessing the effects of disturbance. It tells us that disturbance in one patch has knock-on effects on other patches. It also tells us that source populations are crucial to the long-term survival of sink populations: putting a source population at risk may jeopardize the entire metapopulation.

Most, if not all, of the wind farms in the Mid North are sited on remnant iron-grass grasslands (INTG) amongst PBTL populations. Most wind farms have involved loss of INTG and PBTL habitat. Yet development proposals are assessed piecemeal, ignoring what has happened to INTG and PBTL over the last 20 years, and without considering the potential impacts of other project applications and mooted proposals. Individual wind farms are typically developed in stages, often ending up half as large again as originally proposed. Neoen have discussed their intent to construct one or two additional stages at Goyder North: ideally, this should be taken into consideration when assessing their current proposal.

And while research and monitoring are conducted at some wind farms, there don't seem to be any contingency plans if things go seriously awry. Wind farms are a big new industry and we are still finding out about their longer-term impacts in this region, yet regulatory oversight has diminished. This suggests a level of hubris that alarms me.

The Project Area contains some of the largest remaining PBTL populations: in metapopulation terms it is a source population, even though lizard migration would be infrequent.[1] Neoen's plans will directly affect a large number of PBTL, and indirectly affect many more.

Recreational Access Two significant long-distance trails pass through the Project Area: the Heysen Trail and the Mawson Trail. Both are tourism drawcards, and both are routed to minimise exposure to built-up areas and human activity. Will the proposed development will affect trail access in the Project Area? Will the trails need to be re-routed during construction activities? To what extent will the trail experience be degraded by the presence of this infrastructure? I am unable to find any reference to either trail in Neoen's documentation.

Closing Comments There are many aspects to the Goyder North Proposal that stand to set undesirable precedents, or that raise red flags. A striking feature of the latest round of documents, which are the product of over a decade of development, is their lack of crucial details. It is also disturbing that the proposal has reached EPBC assessment while ecological surveys are still underway.

[1] Note that such rare events can be pivotal, especially in less benign environments.

One consistent feature of Neoen's documentation is the abundance of detail on the pains Neoen says it will take to safeguard INTG and PBTL, and the paucity of quantitative information on the population-level impacts Neoen's proposed activities will have. There is a credibility gap: in places the documentation reads more like promotional material than technical reports.

It is difficult to conclude that Neoen's proposed activities will not have major detrimental consequences for flora and fauna within the Project Area and beyond. Neoen offer a Faustian bargain: the question is whether the modest gains of reduced emissions from a single wind farm that could be sited elsewhere exceed the large biodiversity losses and the substantial extinction risks associated with locating the project at this site.

There are other matters at stake: this project has significant potential to bring 'green' and renewable energy into disrepute. Goyder North may be out-of-mind out-of-sight for now, but it might not remain so. Should there be any serious decline in Mid North PBTL populations public anger could be directed at the renewables sector, and intense public and political scrutiny of the regulatory bodies that approved the project is likely. Is it worth the risks?

Yours sincerely

[redacted]

Fahrig, L. (2003). Effects of habitat fragmentation on biodiversity. *Annual Review of Ecology, Evolution, and Systematics. 34:487-515.*

Haila, Y. (2002). A conceptual genealogy of fragmentation research: from island biogeography to landscape ecology. *Ecological Applications. 12:321-334.*

Hanski, I. (1998). Metapopulation dynamics. *Nature. 396:41-49.*

Turner, M.G. (1989). Landscape ecology: the effect of pattern on process. *Annual Review of Ecology and Systematics. 20:171-197.*

Umwelt. (2025a). EPBC 2024/09929 Goyder North Wind Farm, EPBC Offset Strategy. Report to Neoen. Umwelt, Adelaide.

Umwelt. (2025b). Goyder North Wind Farm, Pygmy Blue-tongue Lizard Management Plan. Draft Report to Neoen. Umwelt, Adelaide.

Umwelt. (2025c). Goyder North Wind Farm, Targeted Pygmy Blue-tongue Lizard Survey Report. Final report to Neoen. Umwelt, Adelaide.

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 5:00 PM
To: [redacted]
Subject: FW: RESPONSE TO - Goyder North Wind Farm preliminary documentation
Attachments: 25_046 RESPONSE TO - PRELIMINARY DOCUMENTATION FOR THE GOYDER NORTH RENEWABLE ENERGY FACILITY STAGE 1, BURRA, SA.pdf

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From: [redacted]
Sent: Wednesday, 19 November 2025 2:28:57 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Cc: [redacted]; [redacted]
[redacted]
Subject: RESPONSE TO - Goyder North Wind Farm preliminary documentation

OFFICIAL

Dear Neoen

Thank you for the opportunity for the Murraylands and Riverland Landscape Board to provide comment on the preliminary documentation required under the EPBC Act for the Goyder North Wind Farm and associated infrastructure. The landscape board has liaised with our colleagues at the Northern and Yorke Landscape Board in developing a response, and we offer our comments in the attached letter.

If you have any queries please contact me directly.

Kind regards

[redacted]
[redacted]
Murraylands and Riverland Landscape Board
[redacted]
landscape.sa.gov.au/mr/
Mon | Tue | Wed | Thurs | Fri
Chat with me in Teams (only available for internal staff)

LANDSCAPE SOUTH AUSTRALIA MURRAYLANDS AND RIVERLAND

The Murraylands and Riverland Landscape Board acknowledges the First Peoples of the lands and waters we live and work upon. We pay our respects to their Elders past, present and emerging, and acknowledge and respect their deep spiritual and cultural connection to Country.

Government of South Australia
Murraylands and Riverland Landscape Board

Murraylands and Riverland Landscape Board

Unit 5-6, Level 1 Sturt Centre,
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Document Reference Number: 25_046

Neoen
Margaret Graham Building
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Adelaide, SA 5000
By Email: contact@goyderenergy.com.au

15 November 2025

Dear Neoen

FOR COMMENT – PRELIMINARY DOCUMENTATION FOR THE GOYDER NORTH RENEWABLE ENERGY FACILITY STAGE 1, BURRA, SA

Thank you for the opportunity to provide feedback on the preliminary documentation relating to the Goyder North Renewable Energy Facility Stage 1, near Burra. The proposal is for a 600 MW wind farm, comprising 99 turbines, a 225 MW BESS and associated 48 km overhead transmission lines (OTL), tracks and roads.

The Murraylands and Riverland Landscape Board (the landscape board) has an interest in this development, given the board's background in monitoring and management of the Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community (INTG TEC) across the state. This response has been prepared in partnership with Northern and Yorke Landscape Board (NYLB), within whose boundaries the development sits. NYLB's response has a primary focus on the Pygmy Blue Tongue Lizard population, whereas the focus of this response is the INTG TEC.
The landscape board has reviewed the documentation on INTG provided, namely:

- Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community Offset Management Plan Report – EBS Ecology – September 2023
- Goyder North Wind Farm Iron-grass Natural Temperate Grassland Threatened Ecological Community Draft Management Plan – Umwelt – Sept 2025
- GOYDER NORTH WIND FARM Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community Assessment – Umwelt – June 2025
- Goyder North Wind Farm NVC Clearance Application - Supplementary Information Working Draft – Umwelt/Neoen - July 2025

The landscape board's position is that INTG TEC is critically endangered, susceptible to impact and exceptionally difficult to recover. A such every effort should be made to avoid impacts as the first principle when developing in this habitat. Within the project footprint there are large patches of INTG TEC, covering condition classes A, B and C. INTG TEC remnant patches are pivotal to the survival of this habitat because it is not possible to successfully offset the habitat. Hence any loss reduces the total extent remaining.

The landscape board offers the following comments:

Impacts to INTG TEC
The landscape board note the updated survey effort undertaken by Umwelt in spring 2024, which has improved the understanding of INTG TEC extent at the site. It has resulted in

many areas formerly classified as C condition being upgraded to Class B. This is a good outcome as it recognises the fluctuations in condition of the grassland and will require additional effort to mitigate impacts on areas of Class B, as required under the Environment Protection and Biodiversity Conservation Act 1999.

According to the preliminary documentation, the proposal has mitigated impacts on INTG TEC from 29.64 ha to 12.43 ha, with a further reduction of 2 ha possible. Recent mitigation measures proposed included re-siting of towers along the OTL and the re-routing of an access track. While this mitigation is welcomed and supported, there are further opportunities for avoidance of impacts, which is the first requirement of the mitigation hierarchy.

Attachment 1 provides detailed comments on potential micro siting and track re-routing which could further reduce impacts on Class B and C INTG TEC.

Cumulative Impacts

Section 8.0 of the supplementary information report on cumulative impacts does not address the condition or loss of the INTG TEC in the broader context of loss across the state. This habitat is only found in South Australia and is being impacted in multiple locations by development causing direct loss. This is additional to existing threats from management and grazing regimes, pests and climate change. This section could give consideration to the relative value of this habitat in the landscape, and also what its loss will mean for the species and communities it supports. While direct impacts are relatively straightforward to quantify, the indirect impacts such as stock movement, changes in grazing patterns etc can lead to deterioration of good condition patches nearby. NYLB have noted feedback from farmers that weed incursions around windfarms are a significant issue, with new weeds appearing post construction that have never been present on the site before. These indirect impacts increase threats to the remaining patches and are why vigilance and action on pests is extremely important.

Temporary clearance

The term 'temporary clearance' is used throughout the documents to refer to areas which will be rehabilitated. For the INTG TEC habitat, there is no demonstrated method to successfully rehabilitate it. The landscape board understand why this terminology is being used; however, it is considered as permanent clearance under the Native Vegetation Act in terms of impacts and offsetting requirements. The community reading these documents may not understand the difference, and to suggest that the vegetation will be restored is not correct. It can be rehabilitated and revegetated but it will not be an INTG TEC that replaces it.

Mitigation recommendations - note

It is noted that the recommendations section of the June 2025 INTG TEC assessment, Section 5.4 is somewhat confusing. In this section the two opening bullet points appear to accept impacts on Class B, with intent to refine design to reduce impacts, while also promoting avoidance of Class C as much as possible. Ideally the design should avoid **Class B impacts** as much as possible. There is also a reference to the previous two recommendations, of which there is only one.

Offset Management

The Goyder North Wind Farm NVC Clearance Application - Supplementary Information Working Draft – Umwelt/Neoen - July 2025 has identified and secured and area of land at 92 Civilization Gate Road, adjacent to Caroona Creek CP, as an offset site. It is not known what the condition is of the INTG TEC and *Austrostipa* grassland at this site, this information will follow in an SEB Management Plan. This area is known to the landscape board and has a mix of INTG condition classes present, it is a good site for rehabilitation. The landscape board will need to review the SEB Management Plan when it is available, to ensure it promotes and furthers long term sustainability of these habitats beyond the initial 10 years of monitoring.

Should the proposal proceed, resulting in the loss of INTG TEC and requiring the offset commitment, the landscape board would be interested in being involved in the review of the INTG monitoring and management reports over the ten years. There is a breadth of experience and knowledge for INTG management within the landscape board's ecology team, which could assist with offset management reviews. This would support the board's knowledge and understanding for any future offset requirements of INTG TEC.

Of equal interest to the board is building a better understanding of how effective mitigation measures are within the project footprint during construction and operation. This could be be developed using a similar approach to the project commitment to provide financial support for Pygmy Blue Tongue long term monitoring to evaluate their persistence adjacent to the wind farm. Alternatively, board involvement could be facilitated through periodic meetings with the ecological contractor managing the wind farm site, potentially combined with attendance at some on site monitoring surveys.

Conclusion

In general the information is difficult to interpret in terms of mitigation and avoidance. It is not easy to see where existing tracks have been followed or where tracks are being created, given the scale of the maps provided. This makes it difficult to visualise where mitigation has been applied and what the outcomes were for INTG TEC.

Given this constraint, it does appear that there may be opportunities to consider further avoidance of direct impacts on the INTG TEC, which the applicant should demonstrate have been considered.

For further information regarding this matter, please contact [redacted] at the Murraylands and Riverland Landscape Board on [redacted] or [redacted].

Yours sincerely

[redacted]

[redacted] **– Murraylands and Riverland Landscape Board**

Enc – Attachment 1 – Detailed comments

Attachment 1 – Detailed comments

These comments are based on a reference map, *Figure 4.1 INTG Impacted by the Disturbance Footprint Across the Project Area (1 of 2)* sourced from page 19 of the *Goyder North Wind Farm Iron-grass Natural Temperate Grassland Threatened Ecological Community Draft Management Plan – Umwelt – Sept 2025 report (the September 2025 report).*
Figure 4.1 is reproduced here to assist in the discussion which follows:

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

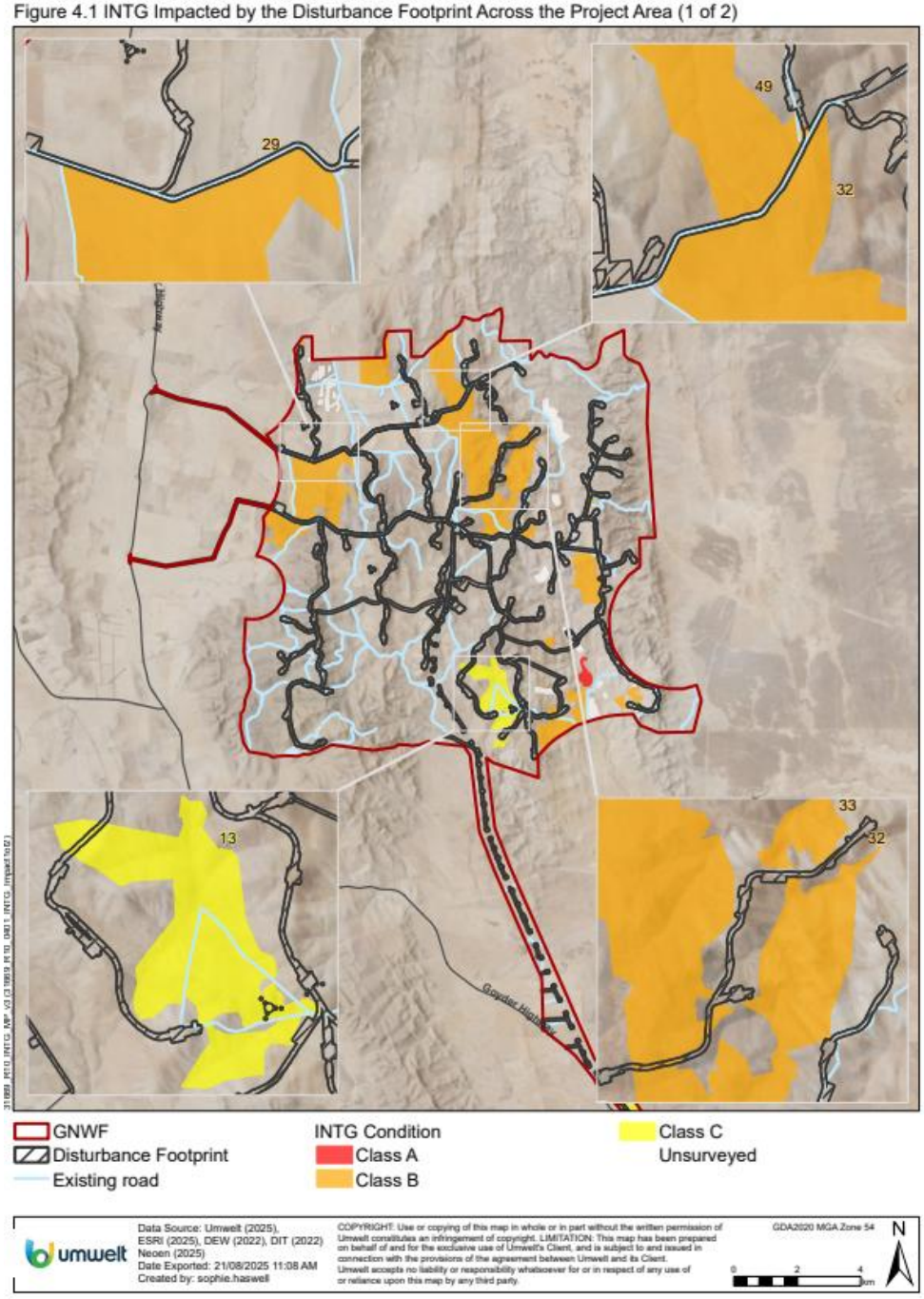


Table 2 (page 21-24) of the September 2025 report describes the local context of patch impact from the development layout. There are 12 locations identified, of which 3 are of interest – Site ID 51, Site ID 24 and Site ID 32:

Site ID 51 – the hard stand will cut the corner of a highly diverse patch containing two vulnerable species from the SA state list. It is asked if there is potential to microsite this hard stand to avoid this direct impact.

Site ID 24 – it appears that the access road to a single turbine here may have been moved west in the most recent design iteration, avoiding the segregation of a patch of INTG. It would be helpful to have this confirmed.

Site ID 32 – This contains a large area of INTG TEC which will be bisected by an access track to access a small number of turbines. Alternative routing could avoid impacts on INTG TEC and is explained further below.

There are three other areas with the opportunity to avoid or mitigate impacts on INTG TEC. These are: 1) the two access roads to the project site, bordering Mokota CP on its northern and southern boundaries; 2) direct loss of INTG TEC in the central and largest area present in the project footprint; and 3) access tracks bisecting or isolating INTG in the south-east corner of the site:

1. Mokota CP – this protected area is impacted on both the north and south boundary by the proposed access roads (see Area A in Figure 1). It is not clear why there needs to be two access tracks into the windfarm, when one may be sufficient. The southern track has INTG TEC to the north in Mokota, and to its south. It is anticipated that many existing tracks may need widening, creating direct loss of INTG TEC. Even if tracks are not widened, they will still create an indirect loss through changes in hydrology, increased pest access and dust. Reducing the number of tracks would reduce the overall impacts on the INTG TEC.

2. Large central area of INTG TEC– this area has been assessed as Class B, while still experiencing grazing by sheep (see Areas A, B and C in Figure 1). An alternative route approaching turbines on the east of this area of INTG TEC on existing roads in the east would avoid the need to bisect this large patch (Figure 2). This alternative route would pass a patch of INTG TEC, not recently surveyed for this assessment and therefore would need to be surveyed to better understand the impacts of the alternative route proposed.

3. Large fragmented area of INTG – in the SE corner of site access tracks appear to be bisecting and isolating Class A, Class B and Class C INTG TEC (see Areas E and F in Figure 3). This is an ideal area for conservation and restoration work to improve INTG TEC. An alternative route is proposed for these sections, using existing access tracks to avoid direct impacts (Figure 4). In addition, two existing roads in the area could be closed for the life of the project to further assist conservation and restoration of INTG TEC.

Conclusion

The landscape board accepts that it may not be as simple as rerouting access, in terms of engineering and slope requirements for safe access and egress. However, given that the alternative routing proposed largely uses existing tracks, it is asked why it has not been considered or included for consideration.

Figure 1: Four of six areas of concern for INTG conservation (within red rectangles; A-D) identified from the map presented in 31669_R10_GNWF_INTG MP_Draft_V2 (page 19). The original map shows INTG (class B) in orange, *Lomandra* grassland in white, development boundary in dark red, existing roads in blue, and proposed disturbance envelopes for new tracks delineated in black.

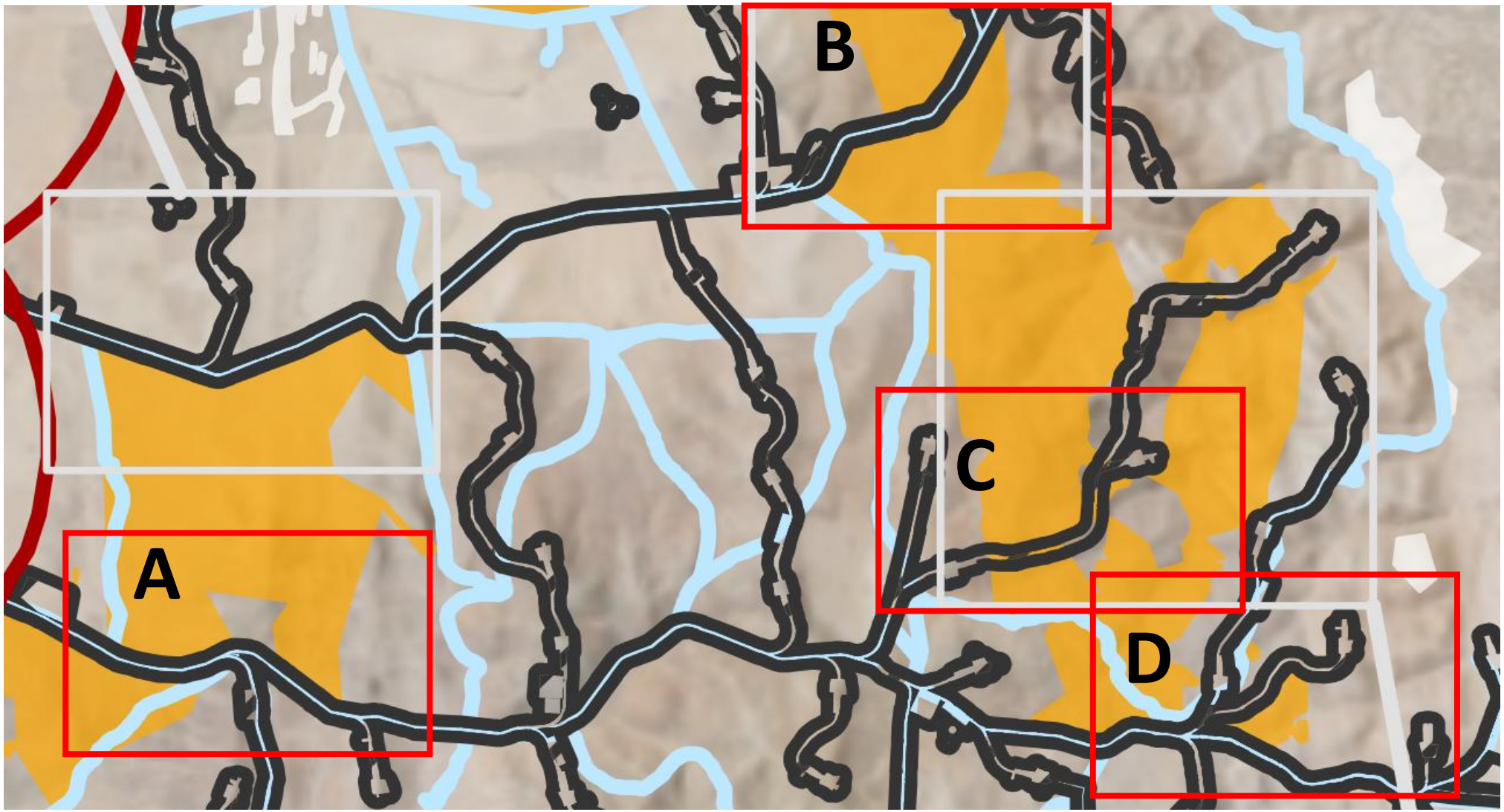


Figure 2: Two of six areas of concern for INTG conservation (within red rectangles; E and F) identified from the map presented in 31669_R10_GNWF_INTG MP_Draft_V2 (page 19). The original map shows INTG in red, orange, and yellow (Class A, B and C, respectively), *Lomandra* grassland in white, existing roads in blue, and proposed disturbance envelopes for new tracks delineated in black.

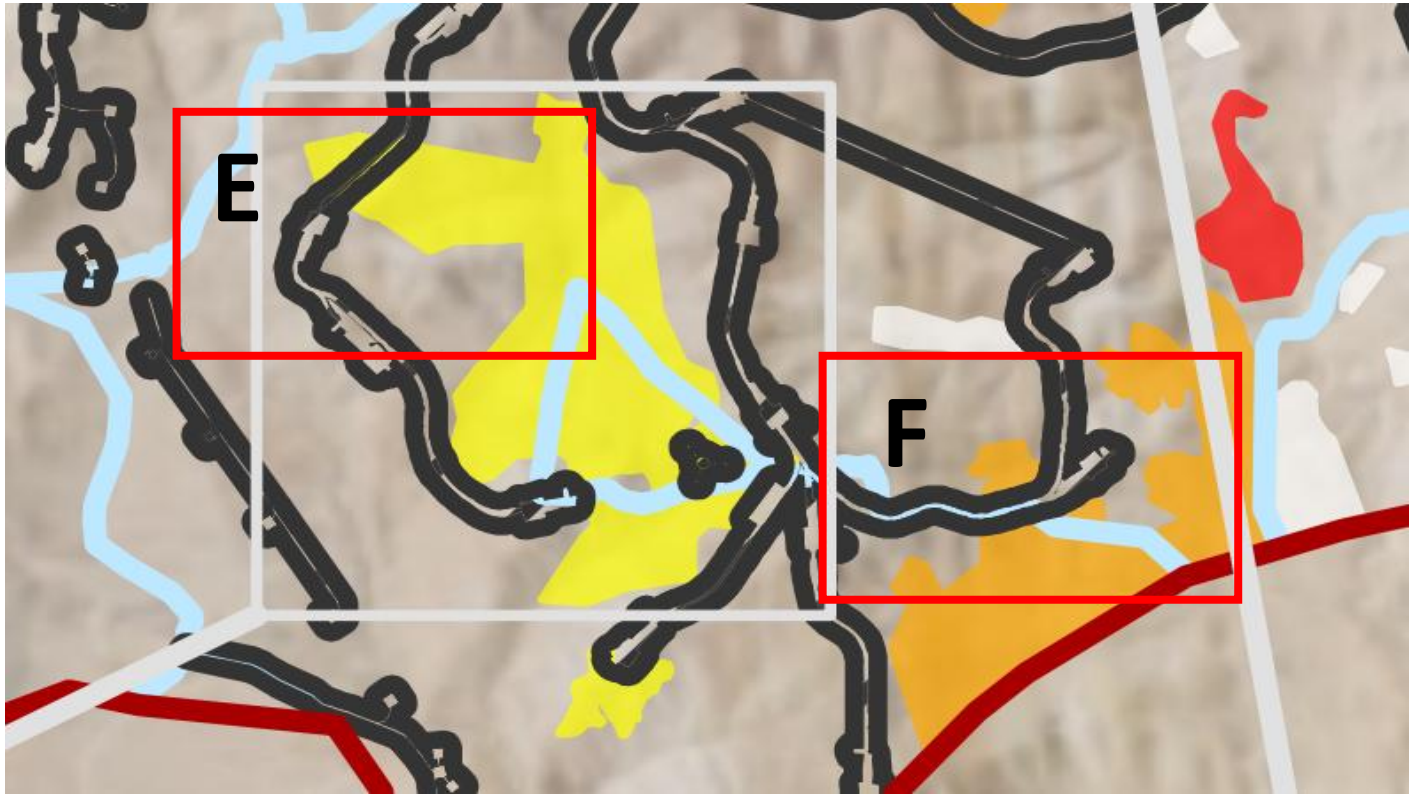


Figure 3: An alternative route to all turbines in the NE that also avoids directly impacting (i.e. bisecting) the large central area of INTG, identified from the map presented in 31669_R10_GNWF_INTG MP_Draft_V2 (page 19). This route makes use of existing roads and would require only two short new tracks. The original map shows INTG in orange (Class B), *Lomandra* grassland in white, the development boundary in dark red, existing roads in blue and proposed disturbance envelopes for new roads delineated in black. Red crosses and hexagons indicate routes which could be avoided, and the points where relevant tracks could be closed, respectively. Light green arrows show the location and length of new tracks and green chevrons show the new route.

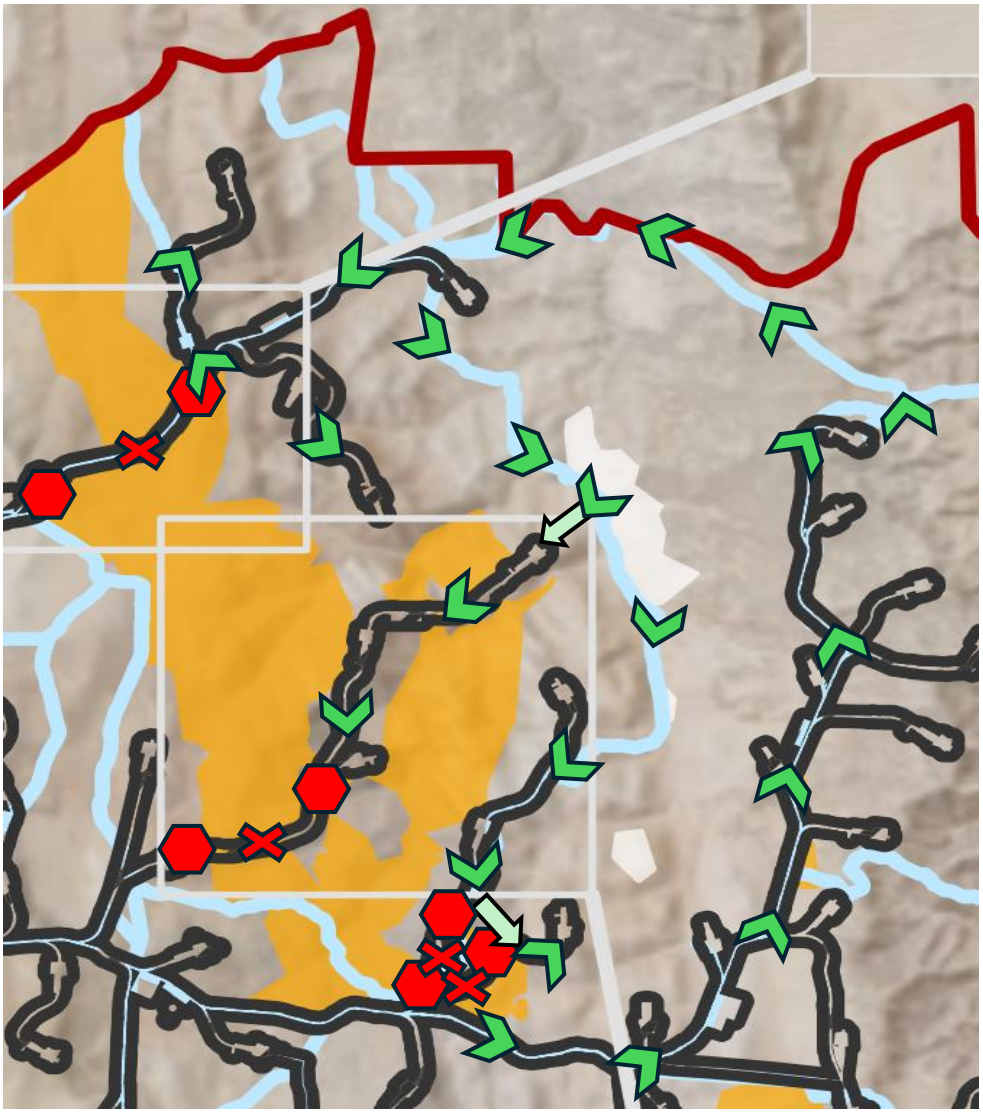
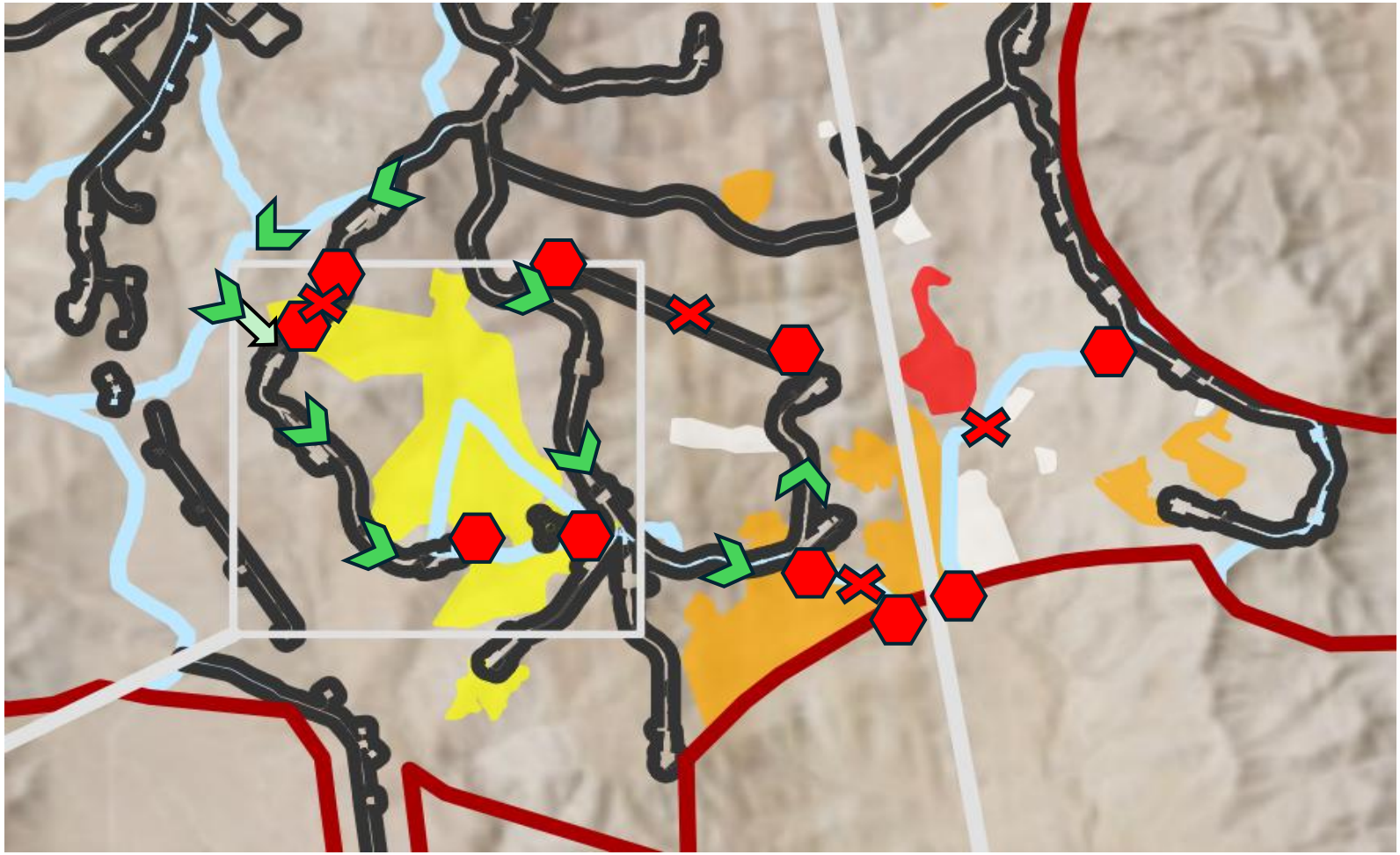


Figure 4: An alternative route to all turbines in the SE which also avoids directly impacting (i.e. bisecting) and indirectly (i.e. isolating) the large, fragmented area of INTG, identified from the map presented in 31669_R10_GNWF_INTG MP_Draft_V2 (page 19). This route makes use of existing roads and requires only one short new track. The original map shows INTG in red, orange and yellow (Class A, B and C, respectively), *Lomandra* grassland in white, the development boundary in dark red, existing roads in blue and proposed disturbance envelopes for new roads delineated in black. Red crosses and hexagons indicate routes which could be avoided and the points where relevant tracks could be closed, respectively. Light green arrows show the location and length of new tracks and green chevrons show the new route. In addition, two existing roads in the area could be closed for the life of the project to further assist conservation and restoration of INTG TEC.



[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 9:08 AM
To: [redacted]
Subject: FW: NYLB Response: Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) [SEC=OFFICIAL]
Attachments: 20251117_Goyder North Stage 1 - Public Comment on updated EPBC Documentation_signed.pdf

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From: [redacted]
Sent: Wednesday, 19 November 2025 6:37:23 am (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Cc: [redacted]
Subject: NYLB Response: Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) [SEC=OFFICIAL]

OFFICIAL

Good morning
Attached response to the Preliminary Documentation for the Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) for your review

Kind Regards

[redacted]

Northern and Yorke Landscape Board
Caring for our region's land, water and nature
[redacted]
Working on Ngadjuri and Kaurna Country
318 Main North Road, Clare SA 5453
Website | Facebook | Subscribe

LANDSCAPE SOUTH AUSTRALIA NORTHERN AND YORKE
landscape.sa.gov.au/ny/

From: [redacted]
Sent: Tuesday, 18 November 2025 4:39 PM
To: [redacted]; [redacted]
Cc: [redacted]
Subject: RE: SIGNATURE:Publication of Preliminary Documentation - Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) [SEC=OFFICIAL]

OFFICIAL

Hi [redacted],

Yes, endorsed to apply my signature to the submission.

Regards

[redacted]

Northern and Yorke Landscape Board
Caring for our region's land, water and nature

[redacted]
Working on Ngadjuri & Kaurna Country
LANDSCAPE SOUTH AUSTRALIA NORTHERN AND YORKE

From: [redacted]
Sent: Tuesday, 18 November 2025 2:59 PM
To: [redacted]
Subject: SIGNATURE:Publication of Preliminary Documentation - Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) [SEC=OFFICIAL]

OFFICIAL

Hi [redacted],

A submission for your review and signature for the proposed Goyder North Energy Facility development. We have previously commented on this development, however, new information regarding the impact tracks will have on PBT populations has become available. Nick and I would like to submit the below submission to highlight the risk these tracks will have on PBT populations through fragmentation.

The submission can be found here.

Cheers,

[redacted]
Northern and Yorke Landscape Board
[redacted]

From: [redacted]
Sent: Monday, 27 October 2025 10:13 AM
To: [redacted]
Cc: [redacted]
Subject: Publication of Preliminary Documentation - Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) [SEC=OFFICIAL]

OFFICIAL

Hi [redacted] and [redacted],

The Preliminary Documentation for the Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) has been published for public comment from 22 October – 19 November. Apologies for the delay in sending this update through.

Documents can be accessed at Goyder Renewables Zone. Please contact the proponent to request access to unredacted versions of any of the documents.

The department would be happy to meet if you would like to discuss the project.

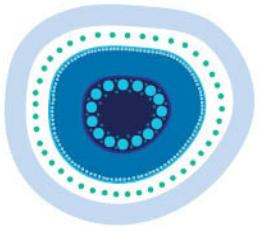
Please let me know if you have any questions.

Kind regards,

[redacted]

Environment Regulation Division | Environment Assessments West Branch | SA & NT Section
Kaurna Country, 60 King William St Adelaide SA 5000
Department of Climate Change, Energy, the Environment and Water
[redacted]

DCCEEW.gov.au ABN 63 573 932 849



We acknowledge the Traditional Owners of Country throughout Australia
and recognise their continuing connection to land, waters and culture.
We pay our respects to their Elders past and present.

OFFICIAL

Northern and Yorke Landscape Board

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ABN 83 450 552 896

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www.landscape.sa.gov.au/ny

Reference: 20251117-NM

Neoen,
Margaret Graham Building
Lot Fourteen, 1A Frome Rd
Adelaide, SA5000
By email: contact@goyderenergy.com.au

Dear Neoen,

The Northern and Yorke Landscape Board has reviewed the updated Preliminary EPBC Documentation for the Goyder North Renewable Energy Facility Stage 1 (EPBC 2024/09929) and would like to voice the following concerns related to impacts on Matters of National Environmental Significance (MNES):

Research findings by Prof. Mike Gardners LEGCS Lab (Flinders University) indicates that genetic flow between pygmy bluetongue lizard (PBT) populations is severely restricted across a 100+ year old rural sealed road, with limited gene flow between adjacent populations separated by as little as 100 meters. These findings have been noted by the Board post-submission of our previous comments on the EPBC documents relating to the development. The Board has serious concerns the construction of Wind Turbine Generator (WTG) service tracks within the development area will fragment what is likely the largest known contiguous populations of PBT's into many smaller populations. The viability of these smaller populations has not been investigated, and therefore there is a significant risk that further fragmentation could render portions of the already patchy population non-viable, undermining conservation outcomes for the species both within the development area and nationally.

Whilst the service tracks are not sealed, having investigated the scale and size of the Goyder South Stage 1 WTG service tracks, we are confident these service tracks will pose a substantial barrier to dispersal and gene flow of PBT's and other low-mobility grassland species within the development area. There has been no investigation of re-engineering or re-designing these tracks to allow movement of species such as PBT's and Flinders Ranges worm lizards, even in smaller, key sections of the WTG access track network. Given this is such an important site for the conservation of PBT's, a conservative approach should be embraced, with a population viability analysis conducted for each patch of lizards potentially being fragmented into a new population, with any populations deemed unviable post-infrastructure installation added to the cumulative impact of the development assessed by Department of Climate Change, Energy, the Environment and Water (DCCEEW). The Board considers it unlikely that fragmentation of such a significant, contiguous population can be offset.

The Board maintains serious concerns around the clearance of Iron-grass Natural Temperate Grassland (INTG), particularly the proposed 6.14 hectares of Class B clearance. There is no clear path to restoring or recreating this community, and no indication that the temporary clearance will recover. This vegetation community is already facing stressors such as a

warming, drying Mid North, and as such even relatively small clearances of high quality INTG are of concern.

Fragmentation of INTG is also a concern, with weeds such as Horehound (*Marrubium vulgare*) and Cutleaf mignonette (*Reseda lutea*), currently present in low numbers in the area, potentially entering high quality INTG onto disturbed ground via tracks and roadsides. While there has been marked reductions in the level of clearance impacting MNES, the Board does not consider fragmentation impacts to have been adequately addressed within the developments impact assessments.

Yours sincerely,

[redacted]

[redacted]

17/11/2025

From: [redacted]
Sent: Saturday, 25 October 2025 1:31 PM
To: [redacted]
Subject: FW: Public comments Goyder North Stage 1

From [redacted]
Sent: Saturday, 25 October 2025 1:30:57 pm (UTC+09:30) Adelaide
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Subject: Public comments Goyder North Stage 1

Neoen had promised that no wind towers would be visible from Burra township. Two of them are. I'm not the only person here to openly call them liars. And as liars there isn't a single thing they say they'll do that I and others would believe.

Australia is a signatory to the CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) which is an international agreement between governments to ensure that international trade in specimens of wild animals and plants does not threaten the survival of the species. Australia joined in 1976. There are 185 countries who are signatories.

"Annually, international wildlife trade is estimated to be worth billions of dollars and to include hundreds of millions of plant and animal specimens. The trade is diverse, ranging from live animals and plants to a vast array of wildlife products derived from them, including food products, exotic leather goods, wooden musical instruments, timber, tourist curios and medicines. Levels of exploitation of some animal and plant species are high and the trade in them, together with other factors, such as habitat loss, is capable of heavily depleting their populations and even bringing some species close to extinction. Many wildlife species in trade are not endangered, but the existence of an agreement to ensure the sustainability of the trade is important in order to safeguard these resources for the future." (CITES)

The "GOYDER NORTH WIND FARM. Iron-grass Natural Temperate Grassland of South Australia Threatened Ecological Community Assessment. FINAL" of June 2025 and the Ecological Assessment Report of September 2025 notes that:

- "The Project Area is known to contain Lomandra (Iron-grass) Grassland vegetation association, which has been broadly mapped (as VA6) within the Project Area in previous surveys undertaken between 2022 and 2024 by EBS Ecology (now Umwelt). It is likely that some areas of Lomandra Grassland meet the criteria for Iron-grass Natural Temperate Grassland of South Australia (INTG) Threatened Ecological Community (TEC) (hereafter INTG), listed as

Critically Endangered under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)."
- Several threatened flora and fauna species are associated with the INTG TEC including Flinders Ranges Worm-lizard, Pygmy Blue-tongue Lizard, Cullen parvum (Small Scurf-pea), Dodonaea procumbens (Trailing Hop-bush) (Threatened Species Scientific Committee, 2007).
- "Other ecological constraints identified within the Project Area include the widespread occurrence of Southern Hairy-nosed Wombat (Lasiorhinus latifrons) and a potential nesting site for Wedge-tailed Eagle (Aquila audax) (WTE). While neither of these species are listed as threatened under state or national legislation, a subsection (68AA) of the NPW Act provides additional protections for the Southern Hairy-nosed Wombat."

Southern hairy-nosed wombats are primarily found in semi-arid regions of South Australia, Western Australia, and southwestern New South Wales. Their populations are fragmented, making them vulnerable to environmental changes and human activities. Efforts are underway to protect their habitats and monitor populations. Wildlife reserves, such as the Moorunde Wildlife Reserve, have been established to provide safe environments for these wombats. Conservation organizations are also working on habitat restoration and public awareness campaigns to support wombat populations.

Nowhere is there a reference to the trade in endangered species, in particular Pygmy Blue-tongue Lizard and the Southern Hairy-nosed Wombat. The ecological assessment appears to make light of the native species there that are under threat or endangered. It attempts to create equivalence between introduced and native, or suggesting the land may be degraded by the very existence of introduced species, such as the domestic cat, which is widespread across Australia.
And because of the potential trade in endangered species, there needs to be controls put in place to ensure workers do not trade in them, and provide independent oversight and controls as required by CITES.

Given our personal experiences of Neoen and, for example, the wind towers in Burra, I would not believe that Neoen are capable of ensuring trade in endangered species is not controlled.

In general I have no faith in Neoen not destroying the land. Once approval is given they can do what they want, how they want and where they want.

[redacted]

[redacted]

From: [redacted]
Sent: Tuesday, 18 November 2025 9:40 PM
To: [redacted]
Subject: FW: comments on Goyder North proposal - public notice

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From: [redacted]
Sent: Tuesday, 18 November 2025 7:06:20 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Cc: [redacted]
Subject: comments on Goyder North proposal - public notice

Hi [redacted] and team.

The PBT Recovery Team think the PBTL surveys, assessments and recommended avoidance measures have been done quite well. We would note that it is important that survey effort for both successful *and* unsuccessful search areas has been documented. Equally, this should then apply to the immediate-pre-development micro-siting surveys to try to learn more about the presence/absence patterns for PBTs through time.

- The Recovery Team believe that the main long-term issue from the development for PBTs is likely to arise from fragmentation. The implication of this is that far more PBTs are likely to be impacted than just those in the direct development impact footprints. We do not yet know enough about the current connectivity among the different areas where pygmy bluetongues are found and this understanding is important to have ahead of the any potential groundwork starting.

  Longer term measures should be put in place to (re-) connect areas of the entire site post road and turbine construction. Perhaps measures could be put in place during the road construction to test if having corridors built across roads would help with connectivity. The design of these would need to be worked out.

  We believe that some part of the offset could be to attempt reconnection by promoting better land management by decreasing the size of paddocks to allow management practices such as rotational grazing. Better land management by graziers may be an effective strategy to improve connectivity if done in a targeted way.

- The Recovery Team are also unsure about the impact of the construction phase on the short- and long-term stress of the lizards and spiders. Does this affect breeding in the short (and perhaps longer term) or shorten the lives of the lizards for instance? Some consideration should also be given to making sure that spider holes near the construction do not fill with soil. Dust could be an issue post road construction.

- The use of short distance relocation of lizards is untested. This strategy was used for Goyder South, but no follow-up was possible and therefore we don't know the fate of the lizards moved or those close to them in their new homes. It is also too soon to know how the translocation (movement of lizards to an offset site for instance) might affect the lizards long term.

- If the project goes ahead, the Recovery Team believe the spiders in the construction area should also be salvaged. Flinders University have trialled ways to move adult trapdoor spiders in the lab with some success, and it would be worth saving spiders in the direct construction site as the spiders are a main driver of lizard presence at sites. These spiders, particularly the trapdoors, could be relocated small distances (like the lizards) or potentially used to increase spider populations in areas within the larger area of the site with limited spider numbers. This latter strategy is untried but could be a worthwhile venture if it proves successful.

- Cumulative effects need to be understood in the context of population size effects and fragmentation.

In summary:

1. Habitat fragmentation is likely to be a major issue and needs addressing
2. Little is known of the effect of the construction phase on the lizards and spiders (both short and long term)
3. Spiders, particularly trapdoors, should be salvaged from the construction areas (roads etc) as well as lizards
4. The fate of relocated and translocated lizards should be followed

Please don't hesitate for further information I would be happy to discuss in my role as chair of the pygmy bluetongue Recovery Team. I have cc'd the DCCEEW folk so they have this information as well.

Kind regards,

[redacted]

[redacted]

[redacted]

LAB OF EVOL
GENETICS, COL
& SOCI

College of Science and Engineering, Flinders University
Honours in Natural Sciences Coordinator
Past President Australian Society of Herpetologists
Chair of the Pygmy Bluetongue Recovery Team

[redacted]

[redacted]

[redacted]

https://gardnerschwarzlab.com/
https://www.facebook.com/Flinders.LEGS/
Twitter: [redacted]

To donate to the sleepy lizard survey click below

www.flinders.edu.au/sleepy-lizard-fund

I recognise I live and work on Kaurna country and other traditional unceeded indigenous lands. I pay my respects to elders past, present and emerging.

Flinders University

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 4:50 PM
To: [redacted]
Subject: FW: Submission
Attachments: Goyder North Renewable Energy sub.pdf

From [redacted]
Sent: Wednesday, 19 November 2025 2:19:31 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Cc: [redacted]
Subject: Submission

My submission is attached.
Thank you for the opportunity to comment

[redacted]

Goyder North Renewable Energy Facility Stage 1, Burra, SA [redacted]

Invitation for Public Comments

My name is [redacted] and I am a Wildlife Ecologist/Conservation Biologist, who has worked predominantly in the mid-north of SA in the Goyder region. I have spent most of the last 16 years researching the ecology of specific species including how landscape changes affect resource flows. As a scientist I agree with the move towards renewable energy, but this move to net zero must not be at the cost of environment and species. We can address the matter of climate change, but we can never replace the loss of biodiversity. Technology is advancing at a rapid rate and there are less environmentally invasive and destructive means to achieve clean green energy.

My concerns regarding the Goyder North Wind Farm have been discussed with the developing company, Neoen, through submissions to NVC, EPBC and at public forums such as the Country Cabinet public meeting. However, my questions have not been answered adequately, hence my concerns regarding this project are summarised below.

1. **Hydrology**

No quantitative or qualitative information is supplied by the company on how the construction of the wind turbines will decrease the water capture in this region. This a semi-arid region that experiences low and unpredictable rainfall with periods of drought. To construct the wind turbines the hill tops are removed to provide a plateau for the concrete base. Removal of hill tops results in a decrease in land surface area, and therefore the area of water capture. The decrease in hill height decreases the gravitational potential. This loss of surface area and gravitational potential decreases the volume of water captured, and the extent to which this lesser volume can travel across the ground surface. The blasting of the hill tops increases the sedimentation that occurs in the water captured, which as well as fouling the water further decreases the area of surface flow through slowing the water flow due to increased friction. The depth of water courses becomes less over time due to aggradation of the water course, and sediment additionally fills fractures leading to the water table. The changing of the topography also diverts from the historical drainage channels, meaning that co-evolved and reliant species are no longer be supported as they were previously.

The Preliminary Environmental Site Assessment undertaken by Agon Environmental specified the single most important issue:

"Water occurrence within the local area is dependent on topography within the area."

The Environmental Site Assessment identified a major issue but this has been ignored. This should have resulted in immediate investigation into the project's impact on water occurrence.

This is the single most important issue because water is this planet's most precious resource, essential for all life. Freshwater is a scarce and finite resource which is increasingly threatened.

The local fauna and flora, the livelihoods of many, and the continuance of agriculture in this region are dependent on water occurrence in the local area. Apart from the many species that have co-evolved to survive in this semi-arid region, this is a traditional agricultural region, important to our regional, state and national economy. Any reduction of water capture in a region of low rainfall, however small, will impact on the ability of these lands productivity and ecosystem health pushing these lands to desertification. Desertification results in unproductive landscapes and has been identified as a threatening process worldwide. Additionally, a worldwide scarcity of water has been predicted which threatens the continuance of all life and our planetary security. It was not a difficult process to determine how much water would be lost through the removal of the hill tops yet this fundamental impact has been ignored. Additionally, landowners have not been advised this loss will occur.

Semi-arid regions are naturally resource poor, and therefore fragile and less resilient to impact and change. They therefore require more protection and not less. They provide vital habitat to specialist species occurring here and nowhere else in the world. The development application states these are degraded marginal lands therefore they may already be at tipping point. The net-zero roll out is NOT a one size fits all undertaking but needs to consider each regions' attributes and sensitivities. This area already supports numerous wind farms and cannot sustain further impact and damage. Most of the energy generated is being transported further afield such as to the BHP Olympic Dam Mine and Canberra. With transportation incurring a loss in the energy gained it is far more logical to place these projects close(r) to the area of demand. For example, there are already degraded areas close to the site of the Olympic Dam Mine.

While the changes to surface flow have been ignored for Wind Farm construction, ironically landowners dam construction has been a major focus of concern due to dam water catchment decreasing the volume of water that supports the surrounding environment and ecosystems. Also researched in some depth and over many decades, has been the impact of mining, where topographical changes have changed and polluted surface flow. These changes to water capture and surface flow have been of major environmental concern, where research of both dams and mining have increased our understanding of the link between topography and water capture. BUT the major impact of a decrease in water that threatening all life, has been ignored in these renewable energy projects which is a major oversight of this project and others especially in semi-arid to arid regions.
Additionally, there is no cap on the water allocation that this construction takes from local bores and water courses. This needs to be addressed.

2. **Loss of species**

An undescribed giant worm found in the initial ecological assessment of the Goyder North Site is a significant discovery and even more so given the environmental conditions in the Goyder region. This worm needs to be researched, documented and identified prior to any project commencement as these species are extremely susceptible to damage from earthworks and construction. They are important ecosystem engineers and provide essential benefits to the substrate and other species. The functions provided gain greater impetus in a semi-arid to

arid region which suffers from poor soils of low nutrient value and high compaction, with limited ability to improve. They are also important bioindicators. These regions remain relatively unassessed, whereby desktop fauna and floral assessments are considered “not fit for any purpose” (DEW).

Iron-grass

The Iron-grass Natural Temperate Grasslands (ITNG) main distribution is in the Flinders-Lofty Block Bioregion. The project area contains substantial remnants of this community which is a nationally listed as a Critically Endangered ecological community under the EPBC Act. The Net Zero roll out has regularly targeted the hills which are sites of the threatened grasslands, placing this species at further risk with further development likely to impact this further. .

Only 1% of the original ITNG footprint remains in the state, which is far below the commonly accepted 30% minimum required for long-term ecological viability. The ITNG in this region is fragmented already but GNWF development will fragment destroy and fragment this further, with recovery unlikely.

Iron grass communities are very susceptible to damage from soil disturbance. Soil disturbance results in weeds that outcompete over 100 inter-tussock community species. Iron grass ecological experts state there has been no successful restoration of an iron grass community and especially in hilly rocky country. To undertake restoration, it is estimated that at the lower range eight million plants are required and a minimum cost of 100 million dollars ([redacted]). Which will supply only some of the necessary grassland species.

Southern hairy-nosed wombat (SHNW)

While this species is not listed under the EPBC Act it is threatened by habitat destruction and degradation, fragmentation and isolation, disease, drought, flood, persecution, road-kill and climate change. With droughts predicted to worsen in duration and severity, and the increasing threat of climate change, this species is predicted to become extinct by 2070-2090.

Management of this species on the Goyder South Farm was illegal, with trapping and relocation of the SHNW occurring. The permit required was not applied for or granted and no appropriate management option for relocation exists. Equipment was inadequate, inappropriate and while micrositing was stated as occurring it did not. Wombats were left displaced, wandering and dead. A Wombat Management Plan written by a metallurgist was inaccurate and inappropriate. This shows a lack of duty of care to species and environment.

The Goyder North project states it will adopt a wombat-specific management plan similar to that prepared and implemented on Goyder South which as stated previously was illegal. Micrositing of infrastructure during construction to avoid impacting known locations of wombat warrens is stated, but will potentially follow past practices. A Southern Hairy-nosed Wombat Management Plan is stated to be implemented.

I was contracted to undertake wildlife management on the GSWF in Jan 2024 and requested to obtain a permit that would allow appropriate management. I stated to the contracting company Elecnor, their current methodology was cruel, inappropriate and illegal, I received abusive messages in March 2024. I also contacted Neoen at this time to address appropriate management, but no response was forthcoming. Later in May 2025, I attended a confidential

meeting with Neoen, raising the issue of illegal management of the SHNW on GSWF and that this must not occur on the GNWF but Neoen denied any responsibility for the contracted company. I stated that as they were the project owner it was their duty to oversee activities and undertake checks. Shortly after this meeting, abusive messages were again received, this time constituting death threats against my family, animals and myself.

Pygmy blue-tongue lizard (PBTL)

A significant impact to the endangered pygmy blue-tongue lizard (PBTL) has been identified as likely. This includes a long-term decrease in the population size, a reduction in the area of occupancy, adversely affect habitat critical to the lizards survival, disruption to breeding, and interfere with this species recovery. With all populations of PBTL considered important due to their restricted and fragmented distribution, this development poses a significant and potentially irreversible threat.

Shadow flicker is an unknown threat but places PBTL at significant risk because the PBTL uses spider burrows for refuge, hunting passing prey, thermoregulation, and birthing sites and disturbance of any kind including shadow flicker across a burrow entrance severely impacts the above necessary activities.

A reaction to shadow flicker may result in unknown behavioural changes. Shadow falling across the burrow face results in the lizard retreats inside its burrow disrupting foraging/hunting, thermoregulation and its breeding cycle. The restriction of normal activities results in loss of condition, increasing risk of predation, disease and parasite load.

The shadow may be interpreted as prey by PBTL inciting the lizard to exit its burrow, increasing risk to predation but also resulting in a loss of condition due to energy exerted for no gain. Additionally, habituation to shadow flicker, increases risk of PBTL to predation.When necessary for a juvenile or adult to seek a burrow this may be delayed compromising individuals and/or increasing risk to predation

The PBTL is reliant on the wolf (lycosid) and trapdoor (mygalomorph) spider for its burrow as it cannot excavate nor modify its own burrow, but the impact of the wind farm on spider populations has not been assessed. Different burrow sizes are required to support a PBTL population. Burrows are at risk of damage or filling by human activity and management activities such as weed management (herbicides) endanger the PBTL.

The PBTL management draft states “WTs are typically installed on hill slopes and crests, which are often not optimal PBTL habitat” but this contradicts expert advisement that PBTL are in higher abundances on the lower slopes of hillsides and therefore in close proximity to WT construction and to all impacts associated with WT construction The vibration and noise, earth moving activities, pose significant risk to PBTL and its habitat. Soil disturbance in PBTL grassland habitat increase the prevalence of weed species resulting in blocked and destroyed burrows and access to their burrow.

Ecological Assessments

Ecological assessment have not been independently undertaken. Assessments undertaken by contracted ecologists utilise the Clean Energy Council Guidelines which are formulated to maximise project approval. Additionally, while the Native Vegetation Council accredits consultants for vegetation assessments which includes a process for revoking accreditation if

necessary, there is no mechanism or entity for accrediting consultants for wildlife assessments. The assessment process therefore leaves wildlife at grave risk. However, independent revered and ethical vegetation ecologists have found that project assessments undertaken by the regular assessment agency (EBS Ecology) have missed large and conspicuous vegetation species and wildlife species. These omissions leave species at risk.

For example:

1. the critically endangered Plains-wanderer has been stated as unlikely to occur in this region but it is extremely likely to occur
2. the critically endangered pale sun-moth has not been mentioned but is likely to occur in the grasslands
3. the vulnerable grey-headed flying fox, has not been mention of but it has been sighted by members of the public and DEW is aware of its movement into the mid-north with numerous sightings every year

other issues.

4. grass species and grass like species have been severely underestimated in reports by EBS Ecology
5. Where a proposed project utilised the services of EBS Ecology large and conspicuous warren systems of the SHNW, directly in the location of a proposed solar array were not documented. These warren systems visible by satellite photography were not observed by consultants walking next to them. This results in an avoidable loss to this species and a higher cost to the company required to undertake greater land stabilisation.
6. Counts of warren systems/burrows of the SHNW were lumped together but are extremely different measures
7. Claims made that SHNWs are typically found in drainage lines is incorrect
8. Claims made that management of the SHNW does not require legislative approval is incorrect
9. Claims made that impacts caused by wombats include erosion and grazing competition is incorrect
10. Claims made regarding management of iron grass land recommends permanent exclusion of grazing which is incorrect and will degrade further the iron grass community.

A lack of knowledge and an inability to research appropriately shows a lack of concern for the environment and species.

An assessments primary objective should be to determine location suitability, environmental impacts, to inform decisions and avoid, mitigate and offset negative consequences but this is not being upheld. Conversely, it has been found the project advises the assessment that miss obvious species, are flawed and misleading and result in irreversible loss to local biodiversity.

Significant Environmental Benefit (SEB)

The SEB site does not present like for like.

Specifically it does not support SHNWs where environmental conditions such as soil type, rainfall and temperature must be suitable.

It contains minimal iron grass grassland while it has a lower rainfall and different soil type to that suitable for iron grass.

The SEB site will therefore not offset loss of Lomandra grassland, nor the species occurring on the wind farm proposed site.

There is no trackable, measurable restoration methodology suggested with vague terminology leaving the company not locked into rehabilitation or restoration of the land.

The most appropriate location for the wind farm has not been chosen. The Goyder and eastern hills contain some of the most valuable habitat or grassland and grassland fauna. The mitigation hierarchy has not been followed and shows the Goyder hills to be unsuitable due to the known presence of nationally significant biodiversity including the iron grass. Landscapes that are too steep and rocky for cropping should be avoided because these are scarce areas of native remnant vegetation. The cumulative impacts from these wind farms significantly increase the risk of degradation and extinction in this fragile landscape.

Thank you

[redacted]

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 1:09 PM
To: [redacted]
Subject: FW: Goyder North Renewable Energy Facility Stage 1, Burra, SA

_____

From: [redacted]
Sent: Wednesday, 19 November 2025 10:38:50 am (UTC+08:00) Perth
To: contact@goyderenergy.com.au
Subject: Goyder North Renewable Energy Facility Stage 1, Burra, SA

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

To whom it may concern,
I am against this project. I hope it will not go ahead. These wind turbines are too close to our beautiful heritage town and are ruining our landscape and habitats of native animals.

Regards,
[redacted]

[redacted]

From: [redacted]
Sent: Wednesday, 19 November 2025 9:41 PM
To: [redacted]
Subject: FW: 2024/09929 Goyder North PD offset strategy: public comments
Attachments: 2024-09929 PD Offset review comments.pdf

From: [redacted]
Sent: Wednesday, 19 November 2025 7:08:05 pm (UTC+08:00) Perth
To: contact@goyderenergy.com.au <contact@goyderenergy.com.au>
Cc: [redacted]
Subject: 2024/09929 Goyder North PD offset strategy: public comments

Dear [redacted],

Please see attached review comments on the draft Offset Strategy for EPBC 2024/09929.

Can you please confirm receipt, and that my comments will be considered.

Please feel free to contact me is you have any questions.

Thank you.

[redacted]

[redacted]

[redacted]

[redacted]

Neoen, Margaret Graham Building
Lot 14, 1A Frome Road
Adelaide SA 5000

contact@goyderenergy.com.au

Goyder North Renewable Energy Facility Stage 1, Burra, SA (EPBC 2024/09929).

Dear [redacted],

Please accept my submission on the Preliminary Documentation for Neoen's proposal to develop the Goyder North Renewable Energy Facility Stage 1 Project, approximately 5.5 km northeast of Burra (EPBC 2024/09929).

My comments relate to the EPBC Offset Strategy V2.0, dated 5 September 2025 (the **Strategy**), for residual significant impacts to the EPBC Act listed critically endangered Iron-grass Natural Temperate Grassland of South Australia TEC (**INTG**) and listed endangered Pygmy Blue-tongue Lizard (*Tiliqua adelaidensis,* **PBTL**).

My submission has been prepared having regard for the requirements of the EPBC Act Environmental Offsets Policy 2012 (the **Policy**) and the How to use the Offset Assessment Guide (the **Guide**).

I consider Neoen has failed to demonstrate suitable direct offsets for the protected matters. This is because, amongst other matters:

- no tangible, physical direct offsets are proposed. I am therefore unable to comment on offset site suitability against the Policy's principles and practices, and public comment on this important issue is prevented;

- the Strategy does not detail the method used by Neoen to score, from 0-10, INTG and PBTL quality, so as to evaluate direct offset proposals;

- for INTG, impact site quality is incorrectly derived, and there is no commitment to ensuring the offset site/s attain and maintain a minimum INTG Class B condition. Some proposed/potential indirect offsets should be assessed as direct offsets; and

- for PBTL, the Strategy points to offset scarcity, and to compensate for this speculates on various ambiguous offset project ideas.

No tangible offset proposal
As outlined above, the Strategy provides no details, and makes no commitments, to delineated, physical areas of PBTL habitat and INTG to be secured and managed as direct offsets. Rather, Neoen outlines a staged approach to locating INTG offsets:

> *There are six patches of Class C INTG within the GNWF Project Area which are being considered for the proposed INTG Offset, having been determined the most suitable to achieve a conservation gain. If a patch (or patches) of INTG within the Project Area cannot be used for the INTG Offset, or these patches do not contain enough INTG for the entire INTG Offset, Neoen will investigate the potential to use a patch or patches of INTG located within the surrounding region, or other patches identified within the GNWF Project Area* (p.vi).

With respect to PBTL offsets, the Strategy states:

> *PBTL Offsets can be difficult to achieve due to a genuine scarcity of available potential on ground offset sites. A multifaceted approach is proposed to diversify the approach to PBTL conservation and habitat restoration, which together presents a viable pathway to securing an offset for PBTL with a focus on habitat restoration, land management, and population monitoring to support the species' conservation* (p.vi).

These statements give the reader no confidence there is a viable pathway to secure and manage suitable INTG and PBTL offsets. This is especially concerning given that through the 2022 approvals for Goyder South - EPBC 2021/8957, EPBC 2021/8958 and EPBC 2021/8959 – Neoen must have become aware of, and therefore should be better placed to address, the offset scarcity facing this proposal.

Neoen states it '*will continue to investigate options for the EPBC Offsets for INTG and PBTL and progress to an Offset Proposal and/or Offset Management Plan for each'* (p.1). To ensure proper consultation and transparent assessment and decision-making, Neoen should revise the Strategy when, conservatively, adequate direct offsets are detailed and circulate the revised Strategy to submitters for further comment before the Strategy is submitted to DCCEEW for decision.

No quality scoring frameworks
The Guide speaks to quality scores for '*area of habitat'* and '*area or community'* as *'a measure of how well a particular site supports a particular threatened species or ecological community and contributes to its ongoing viability'* (p.4).

The quality score is a whole number of 0-10, required for the impact site, offset site at commencement of offset management, and offset site future quality *with* and *without* offset at the time of/to ecological benefit. It is therefore critical to offset evaluation that the same quality scoring method, and associated metrics and thresholds, are used to derive the four quality assessments, including because:

- the calculator uses a mass balance (area x quality) approach;

- future quality with and without offset, with suitable metrics/thresholds, helps assess the feasibility of the offset, time to ecological benefit and defensible confidence in result (for elements that constitute the *raw gain* score); and
- suitable metrics should be included in the monitor program to detect offset progress, failure and/or success.

Tables 2.9 and 3.9 score INTG and PBTL quality at the impact sites. However, the lack of a documented quality scoring method, with precise metrics and threshold values to evaluate direct offset proposals and monitor success, is a profound failing of the Strategy. On this basis alone the Strategy should be substantively revised if it is to comply with the Guide, to meet the Policy's objectives.

May I suggest Neoen as a matter of priority contract subject matter experts (SME) to derive or review quality scoring frameworks, the metrics for each score, and to weight *each component* to ensure the *ecological requirements* of PBTL and INTG are science-based. SME concurrence should be provided in the Strategy.

Iron-grass Natural Temperate Grassland
As foreshadowed, there are several issues with the INTG component of the Strategy. To begin, the Guide does not require species stocking rate (SSR) be considered when assessing the quality of an ecological community. The Guide lists several questions:

> *What is the presence of* **the species** *on the site? (i.e. confirmed/modelled)*
> *What is the density of* ***the species*** *known to utilise the site?*
> *What is the role of the site population in regards to* ***the overall species*** *population?*

to help the reader begin to assess species habitat quality, such as for the PBTL, and not the quality of an ecological community. The keystone/diagnostic species endemic to INTG are assessed through the site condition component:

> *What is the diversity of relevant* ***habitat species present*** *(including both endemic and non-endemic)?*

Other than for Goyder South, the EPBC notices page shows limited instances of TEC offsets in South Australia to benchmark this approach. Evaluation targeting *species habitat quality* are not a feature of quality assessments for TECs in other jurisdictions, such as for Natural Temperate Grasslands of the Victorian Volcanic Plain TEC[1] or for the Swan Coastal Plain Banksia Woodland TEC[2]. Please note, I am not suggesting Neoen adapt these for INTG, but rather note that SSR is not included. Neoen should prepare an INTG quality scoring framework that complies with the Guide.

Also, in regard to INTG:

- should Neoen retain Table 2.9 as is, the table incorrectly calculates a total score of 6/10, which should be 7/10;

[1] Melbourne Airport Preliminary Documentation
[2] See Appendix C, EPBC Act approval granted to EPBC 2023/09450.

- if the INTG offset start quality is Class C, then to compensate for impacts to 'diagnostic' INTG Class B, the offset must at a minimum attain the quality of the listing criteria and Class B within the '*time to ecological benefit'*. This commitment should be made in the Strategy and offset management documents, and metrics for diagnostic INTG Class B underpin monitoring, reporting and continuous improvement; and

- Section 4.2 outlines how *Neoen is pursuing opportunities to contribute to the INTG Offset as an additional compensatory measure through financial contributions to already established local or regional programs aimed at enhancing the health and resilience of INTG*. This proposal is for an on-ground direct offsets, and should be subject to the securement and offset assessment principles and practices used for the minimum 90% direct offset.

Pygmy Blue-tongue Lizard
The Strategy commits to providing suitable offsets for impacts to 20.04 ha of 'known' and 348.06 ha of 'likely' habitat, differentiated by the detected presence of PBTL.

As mentioned above, the Strategy gives no confidence that suitable offsets <u>are available</u> to compensate for impacts to PBTL. This is due to:
- upfront statements in the Strategy that PBTL habitat offset scarcity is an issue;
- speculating on various unquantified, vague project possibilities; and
- the scale of the impact and potential offset requirements. By way of a hypothetical scenario to offset impacts to '*likely'* potential habitat only (348 ha), a conservative 0% risk of loss, same quality impact and offset start quality (6/10), 2/10 raw gain at 75% confidence, and 15 years to ecological benefit[3], would mean an offset area of about 1,680 ha.

Neoen claim there *are six patches of Class C INTG within the GNWF Project Area which are being considered for the proposed INTG Offset*. However, according to Appendix 1 of the Strategy, the total area of INTG Class C patches in the *GNWF Project Area* totals 308 ha. I note a total 2114.72 ha of surveyed PBTL habitat is present in the GNWF area.

I am also concerned the Strategy proposes a PBTL '*research component equivalent to 10% of the offset … to investigate the relocation success of PBTL'*. I would suggest this and other research proposals required by Neoen to design and implement effective 'direct' offsets are not 'indirect' offsets, but intrinsic to delivering some of these and direct offsets for future stages of the Facility.

Other matters
I would add that the Strategy, approved as is, may constrain subsequent decision making, in particular where subordinate offset management plans are conditioned in the approval to be consistent with the Strategy. For example, the Strategy:

[3] Please note these assumptions are for discussion only. The Strategy lacks a scoring framework, offset site information, evidence of likely future habitat quality decline under business as usual, and evidence of the land management and monitoring that would attain and demonstrate improvement.

- states *The OMPs will include a detailed monitoring program, typically of a 10 year duration, to determine if the expected outcomes are being achieved or progressing to being achieved* (section 4.8). By this statement Neoen appears to seek to limit its **offset monitoring obligations**, despite providing no information on offset start and future qualities, effectiveness of management measures and precautionary timeframes for attaining and demonstrating offset completion;

- states **expected outcomes** for the INTG and PBTL offsets, including '*to maintain and increase (where possible) the condition/quality'* of the offset areas. If this outcome is not possible then the offset is not suitable. I suggest this aspect of the expected outcomes be deleted as it seeks to pre-empt offset quality outcomes otherwise derived from the evidence-based assessment of actual offset sites; and

- refers, on Page 20, to a 7.75ha area of **'temporary' INTG disturbance**, and that this will be rehabilitated using best practice methods, which will be outlined in a proposed Rehabilitation Management Plan. Has Neoen provided the DCCEEW evidence of the nature of the temporary disturbance and, with supporting evidence, demonstrated the INTG will be rehabilitated to pre-disturbance condition over the short term? Why does this impact not requires offsetting?

Further, the risk assessment at Table 4.5 is not fit for purpose, as it:
- confuses risks with consequences – the latter being failure to attain and maintain offset 'future' quality criteria and timeframes, and securement objectives; and
- does not address offset scarcity, nor potential failure to improve the quality of Class C INTG offsets to diagnostic criteria and Class B quality by the time to ecological benefit.

I hope Neoen finds the above helpful. My comments are not exhaustive, but intended to rapidly address the majority of key issues with the Strategy.

Would you please advise me by text [redacted]) or return email that my submission has been received and will be considered.

Yours sincerely.

[redacted]

[redacted]

19 November 2025

Government of South Australia
Department for Environment and Water

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Neoen Australia Pty. Ltd.
Attention [redacted]
Margaret Graham Building
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1A Frome Road
ADELAIDE SA 5000

By email: contact@goyderenergy.com.au

Dear [redacted]

Re: Comment on Preliminary Documentation for Goyder North Renewable Energy Facility Stage 1, Burra, SA (EPBC 2024/09929)

I refer to the publication notification made by Neoen Australia Pty. Ltd. (Neoen) to comment on preliminary documentation under Section 95A(3) of the *Environment Protection and Biodiversity Act 1999* (EPBC Act) for the proposed development of a renewable energy facility at Wandillah Rd, Burra, South Australia (EPBC 2024/09929).

I write on behalf of the South Australian Government (SA Government), and take this opportunity to comment on the preliminary documentation assessing the proposed action on Matters of National Environmental Signfincance. I advise that a review of your documentation has been undertaken and comments have been collated and attached to this letter (Enclosure 1) for your consideration.

The SA Government acknowledges that a considerable amount of time and effort has been spent on preparing the detailed reports and supporting information for this proposed development.

The documentation is comprehensive and identifies a number of impacts in detail, in particular, the section analysing cumulative impacts to several EPBC Act listed matters (Pygmy Blue Tongue Lizards *Tiliqua adelaidensis* (PBTL), Flinders Ranges Worm Lizard *Aprasia pseudopulchella* (FRWL) and Iron-grass Natural Temperate Grassland of South Australia (INTG) TEC).

Attached are detailed comments from the SA Government on the Preliminary Documentation for Goyder North Renewable Energy Facility Stage 1, Burra, SA (EPBC 2024/09929) for your consideration. These comments primarily relate to those areas where potential significant impacts on PBTL and INTG TEC requires further consideration:

- Enclosure 1 – EPBC Act Matters
- Attachment A – State Matters

For further information regarding this matter please contact [redacted], [redacted] on [redacted] or by email at [redacted]

Yours sincerely

[redacted]

[redacted]

Department for Environment and Water
24/ 11 / 2025

Enc. 1 – SA Government - Comments on Preliminary Documents – Goyder North Renewable Energy Facility Stage 1, Burra (EPBC 2024/09929)
Att A – Goyder North PDs State Matters
Cc: [redacted], SA Assessments Section, Department of Climate Change, Energy, the Environment and Water

ENCLOSURE 1

Government of South Australia

Government of South Australia - Response Document: Goyder North Renewable Energy Facility

Documents: Preliminary Documentation for Goyder North Renewable Energy Facility Stage 1, Burra, SA (EPBC 2024/09929)

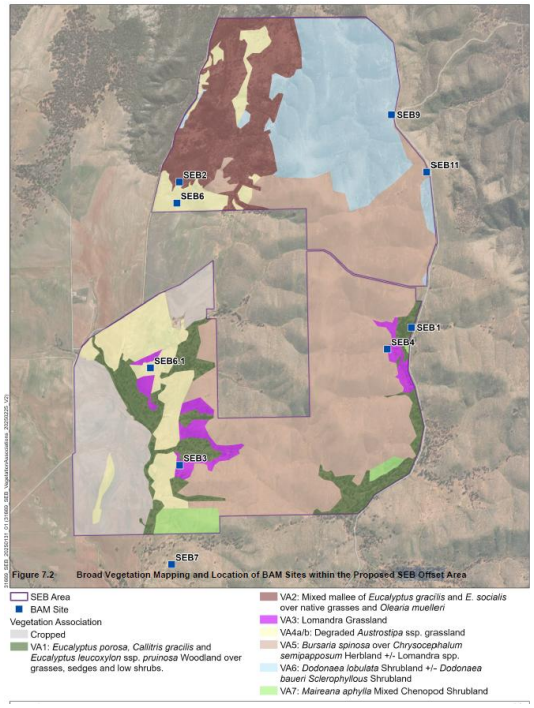
Document date: 24 November 2025

Comment/ Reference	***Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) matters**
	EPBC Act species – comments / suggested corrections
1	**WTG Setbacks from INTG**
Tabe 6.1 S 6.1.2 Pg 295	The Preliminary Documentation (PD) for the Goyder North Renewable Energy Facility Stage 1, Burra, SA (Goyder North Wind Farm (GNWF)) states in Table 6.1 of Section 6.1.2, p. 295 of the PD, to set back Wind Turbine Generators (WTG) from Mokota Conservation Park (CP) by 450 metres (m) *"to avoid impacts on conservation values and significant populations of INTG"*. DEW questions, that given a buffer has been applied of 450m to avoid impacts on Mokota CP in recognition of potential impacts on INTG, should consideration of a buffer also be extended to other stands of INTG in order to mitigate impacts where clearance is not proposed for INTG within the Project Area?
2	**NEOEN Volunteering Conservation of YMN NPWS' Mokota Conservation Park (MNES impacted = Flinders Ranges Worm Lizard (FRWL); Trailing Hop-bush (THB); Iron-grass Natural Temperate Grassland of South Australia (INTG))**
Table 7.49 Pg 437 Offsetting	Table 7.49 of PD, under the heading "Operation – Offsetting" states: *"Neoen are exploring ways they might be able to enhance the values or contribute to the future preservation of Mokota Conservation Park including, where a known population of Trailing Hop-bush occurs. This is an above and beyond measure proposed by Neoen, as no impact is expected, and thus no offset is required."* DEW welcomes support for the Mokota CP, in particular regarding INTG, and would like to discuss this with Neoen.
3	**Accuracy of INTG Condition Class Mapping**
INTG Assmnt Rpt Figure 5.1 Pg 26 INTG Assmnt Rpt Table 4.2	DEW recognises that Neoen may not have access to all the data on INTG to accurately consider condition classes. Several aspects of the description of INTG surveys suggest the Condition Class mapping for INTG may not have the greatest confidence. This includes: i. Condition Class Mapping of INTG for Mokota CP by Umwelt (see below figure, left, taken from Figure 5.1, p. 26 of the INTG Assessment report) is different to the preliminary draft mapping undertaken by the Murraylands and Riverland Landscape Board (MLRLLB) (below, right) with the latter identifying Class A INTG and producing finer detail in the classification, contrary to the former which maps the INTG uniformly as Class B. ii. Table 4.2 of the INTG Assessment Report states the assessment of INTG on GNWF was not undertaken in good seasonal conditions or within two months of effective rain as per the recommendations in the Survey Methodology in the Conservation Advice and National Recovery Plan. The condition classification depends upon broad leaf, seasonal species being detected and the number influences the condition class assigned.

	Surveying in suboptimal conditions could mean areas of INTG are classified into a lesser condition or not classified as INTG at all. This is illustrated in the comparison between Umwelt's and the MLRLLB's mapping, where no A class has been identified.
INTG Assmnt Rpt S 3.2 INTG Assmt Rpt	iii. Table 4.2 of the INTG Assessment Report states INTG surveys should be undertaken at least two months after a disturbance such as grazing, however it is stated this occurred during high levels of livestock grazing and that grasses were difficult to distinguish to species level. Section 3.2 states that native grasses were often grazed to ground level, were highly modified in structure and with no mature seeds available for identification. This is highly likely to lead to inaccuracies in assessing INTG condition class, as the number of grass species influences the condition class results and could result in patches of INTG classified into a lesser condition or not classified as INTG at all. iv. Section 3.2 of the INTG Assessment Report states that, to mitigate these issues, areas with Lomandra species covering more than 10 percent of the assessed patch were considered Lomandra Grassland if the factors conveyed in points (ii) and (iii) were also present. By using the term '*Lomandra* Grassland', it is difficult to know if this was included specifically as INTG. v. Section 3.2 of the INTG Assessment report states the estimate of *Lomandra* plants was subjective and could vary from surveyor to surveyor. [redacted] **Comment**: DEW recommends Neoen contact DEW to arrange access to the complete data that DEW has access to.
4	**EPBC Critically Endangered Plains-wanderer (*Pedionomus torquatus*)**
Table 4.1	Table 4.1 of the PD identifies that it is "Unlikely" that the EPBC Critically Endangered Plains-wanderer (*Pedionomus torquatus*) would occur in the Project Area.

	DEW advises that Mokota CP is a site that is part of the Plains-wanderer partnership between BirdLife Australia, Bush Heritage and the South Australian Arid Lands Landscape Board which is funded by the 'Saving Native Species' grant under the Federal Natural Heritage Trust (NHT) program. This program aims to update and revise data on the current distribution of the species across South Australia. Two song meters are installed in the Mokota CP aiming to establish the EPBC-listed species' presence in remote areas of its former range. There are historical and anecdotal records of the presence of this species in Hallet, Nackara, Nantawarra and Willowie. The first round of data will be retrieved from the song meters in the near future and will be analysed by the Project team. If the species is detected by the Mokota CP song meters, the species should be reconsidered for its potential to occur in the GNFW Project Area. DEW can connect Neoen with the project team.
5	**Flinders Ranges Worm Lizard (FRWL) Survey Methods**
S 4.4 Pgs 133 – 140 FRWL Assmt Rpt Table 3.1	DEW was pleased to see that multiple observations of FRWL across GNWF were made, even though surveys occurred in Autumn which is outside optimal survey time. DEW notes that whilst these surveys captured multiple observations of FRWL, it is not recommended that these surveys alone be used to assist micro siting infrastructure to avoid impacting FRWL. The main concern from DEW is that current surveys may not accurately reflect the population of FRWL within the Project Area and further surveys carried out during optimal conditions may identify additional individuals in other locations across GNWF. DEW also advises that recent survey work has found that surveys carried out in Winter, immediately following heavy rainfall, is a more optimal time for surveying for the FRWL and recommends Neoen contact DEW to obtain these details to assist in future surveys.
6	**Cumulative Impact on MNES**
Table 4.6 Section 4.3.6 Pg 125	<u>INTG TEC</u> DEW notes the concerns over cumulative impacts on INTG TEC which is understood to be addressed through the assessment of this project and consideration of Neoen's applications made to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) and the Native Vegetation Council (NVC). <u>PBTL</u> Table 4.6 of the PD states an estimated total or average population of PBTL on GNWF is ~6519.04 individuals with an estimated number of PBTL in the Disturbance Footprint of 191.75 – 273.78 individuals (Table 4.7). This represents high number of PBTL that will either suffer from mortalities or eviction from their habitat as a result of the proposed wind farm. DEW notes the concerns over cumulative impacts on PBTL which is understood to be addressed through the assessment of this project and consideration of Neoen's applications made to the DCCEEW) and the Native Vegetation Council (NVC). <u>Southern Whiteface (SWF)</u> Section 4.3.6, p. 125, identifies that up to 263 Southern Whiteface (SWF) individuals were observed in the Project Area across 47 observations, which may be higher given the inclusion of the SWF under the EPBC Act in March 2023, although could include repeat observations of the same individuals over different survey periods. It is noted the SWF likely nest in the Project Area or nearby and targeted surveys have not been undertaken in the OTL areas although individuals have been recorded in the OTL areas with suitable habitat present (Figure 4.9 of the PD).

	The Project also proposes to establish a high voltage Overhead Transmission Line (OTL) of 275 kV or 333kV between GNWF and Bundey Substation (48 km in length). The Southern Whiteface (SWF) is a species that has regularly been identified as being impacted in other developments in this region, including Goyder South (in construction and operation), Twin Creek (not yet constructed, in approvals phase) and Whyte Yarcowie (not yet constructed, in approvals phase). DEW recommends that cumulative impacts on SWF should be considered as part of the project assessment.
7	**Offsets for MNES: PBTL (and INTG)**
Table 7.9 Pgs 353 – 356	<u>Relocation and Translocation Methods</u> Table 7.9 (pg 353-356) of the PD identifies two options of uncertain effectiveness to offset impacts to PBTL. Firstly relocating (moving) PBTL to another area away from the construction footprint, the effectiveness of which is unknown, as the survivorship of individuals was not ascertained during occasions when this was implemented in the past. Secondly translocation, which is the other alternative method highlighted for larger populations of PBTL. Whilst it states the first two years of the Worlds End translocation has demonstrated short term success with evidence of breeding, this trial has not released translocated individuals into the wild as yet, with the barrier of the PBTL enclosure still in place. It is generally considered that translocation projects can only be considered successful when individuals are fully released into the wild and they become a self-sustaining population. DEW has concerns over relying on outcomes of this translocation given it has not yet been demonstrated as a success. <u>Translocation</u> If it is deemed a translocation process is most appropriate and in the best interests of the PBTL, DEW recommends the DCCEEW and IUCN Guidelines be followed including Exit Strategies. It is noted that GNWF construction time pressures and permanent alteration of the environment may be in conflict with the Guidelines, for example, implementing an Exit Strategy with minimal ability to return the lizards or find alternative habitat if the process is not achieving necessary milestones. It is also noted that identifying a suitable translocation site is limited given competition for land in the region and existing challenges for new developments, conservation and offset sites together in an area that has limited suitable habitat remaining. <u>Co-Siting Offsets</u> Table 7.9 of the PD refers to the translocation of PBTL onto Worlds End as a positive outcome. Whilst there is a potential positive outcome for PBTL, this has resulted in the active reduction of another EPBC Endangered species, *Acacia spilleriana* (Spiller's Wattle), the regeneration of which will now be restricted to allow suitable PBTL habitat. This example shows that co-siting of offsets may cause negative outcomes for some other species and ongoing management regimes that the landowner must maintain (including killing woody native flora indigenous to the site in favour of siting the PBTL offset). <u>Long Term Viability of Translocated PBTL</u> It is acknowledged that Neoen have invested considerable funds on PBTL research which is commendable.
Table 7.9 Pgs 353 - 356	

Table 7.9 Pgs 353 - 356	In terms of the long term viability for PBTL translocation, a key aspect of IUCN Translocation Guidelines is to consider the impact on the destination ecosystem of translocating a species to a new site. For the Worlds End PBTL translocation project as an example, the PBTL only occurs in very low numbers on the western side of Worlds End, as specified in Worlds End documentation (Management Plan commissioned by Neoen), likely due to the rocky substrate and subsequent lack of spider burrows, in that this area is naturally relatively unsuitable for PBTL. The long term viability of the translocated PBTL population to Worlds End will depend upon a constant investment to maintain suitable habitat (removing native woody plants, including those which are Endangered) and installation and management of artificial burrows which is expected to be resource intensive. DEW recommends that the progression of a translocation project for PBTL is best to be carried out over a time frame that will afford the necessary consideration to the translocated species, both source and translocated populations, as well as the destination ecosystem and all of its elements individually and as a whole. The consideration of the land manager and their capacity to sustain the management obligations to enable the translocated population to survive, effectively, in perpetuity, should also be thoroughly considered. <u>SEB (*Native Vegetation Act 1972*, South Australia) Offset:</u> Notably, based on earlier documentation for Native Vegetation Council (NVC) approval for the SEB Offset, the project appeared to have found a minimalistic SEB Offset site for Stage 1) which does not contain PBTL habitat with minimal area for *Lomandra* grassland: 

	The current PD states that (Table 7.9 of the PD) Neoen have found an offset for GNWF (1,300 ha) and the effectiveness of the property is 'high' in providing offsets for PBTL and *Lomandra* grassland. DEW notes that NVC have reviewed the offset management plan and endorsed as part offset for Stage 1 of the clearance approval.
	Mitigation strategy comments
8	**<u>Ecological Asset: Mokota Conservation Park (CP) - MNES present:</u>** **Flinders Ranges Worm Lizard (FRWL), Trailing Hop-bush (THB), Iron-grass Natural Temperate Grassland of South Australia (INTG)**
	<u>Table ES1</u>: Key elements of Neoen's application of the mitigation hierarchy Statement "Avoidance of all conservation areas, including Mokota Conservation Park and Tiliqua Nature Reserve, including August 2025 refinements that achieved a 450 m setback for WTG tower centres." P. ES-8 of the PD.
Table ES 1 Pg ES 8 S 4.12.6 Pg 196 S3.3.4 Pg 68	DEW has concerns regarding the potential impact of the GNWF on Mokota CP. Below are details of the ecological values and concerns. **<u>Mokota CP's historical information and ecological values:</u>** • Mokota CP was gazetted in October 2000 for the purpose of conserving native grasslands, particularly the *Lomandra* grassland. Grasslands are underrepresented within the State reserve system. • Mokota CP is comprised of two environmental associations (Burra Hill and Hansen) and only a fraction of the benchmark goal of 15% are formally conserved. • Mokota CP supports records (BDBSA and internal) of the EPBC-listed Flinders Ranges Worm-lizard (FRWL) and three records of the Elegant Parrot, a *National Parks and Wildlife Act 1972* (NPW Act) listed Rare species, as recent as 2022, and a reliable record of the Australian Bustard (NPW Act Vulnerable) from 2009. • At least 17 NPW Act and EPBC -listed flora species are recorded in the park, with two being a part of regular conservation monitoring by NPWS, and 5 of those flora species have over 100 records in the park. • The park supports 6 records of orchid species including a NPW Act rated Vulnerable species with reliable and repeated records from 1999 to 2016. • As already mentioned Mokota CP is a site that is part of the Plains-wanderer partnership funded by the 'Saving Native Species' grant under the Federal NHT program which aims to update and revise the current distribution of the species across South Australia. Two song meters are installed in the park aiming to establish the EPBC-listed species' presence in remote areas of its former range, such as the Mid North NPWS district, particularly given the park's suitable habitat for the bird species. **<u>Concerns for Mokota CP:</u>** <u>Proposal</u> Section 4.12.6 (pg 196) of the PD states Mokota CP is within the Development Envelope of the GNWF. Section 3.3.4 (pg 68) of the PD states "*No protected areas are proposed to be impacted by the Project [...]*". DEW has some concerns over the following potential impacts to the Mokota CP and limited assessment of potential impact in some cases: 1. only direct impacts of clearance within a Disturbance Footprint seem to be shown as being assessed; 2. GNWF proposal almost envelopes Mokota CP, with access roads to the windfarm running north and south of Mokota CP and within the windfarm proposed for the eastern boundary

	3. significant concern for the proposal if~ 90% of traffic for the windfarm directed along the southern boundary of Mokota CP. 4. there appears to be approximately 8 WTGs surrounding the Mokota CP 5. Spacing of proposed WTGs and windfarm roads is such that the gap provided between the rows of turbines by the Mokota CP does not appear overly different to the gap between rows of turbines elsewhere in the Disturbance Footprint. 6. Potential impacts from road development and widening, transportation of equipment and changes to hydrology on vegetation and fences; 7. Potential increased weed contamination of the park from the 14 Declared weeds found on Goyder North (Section. 3.3.7.5., of the Preliminary Documentation, Introduced Flora, p. 85); 8. Potential Shadow Flicker Impact; 9. Potential Bird Strike from the wind turbines surrounding the park; 10. Loss of Amenity from wind turbines surrounding the park. <u>Road Status</u> DEW has concerns regarding impacts on conservation from the proposed road along the southern boundary of Mokota CP (as described above proposing 90% traffic to this road). It is noted there have been some discussions with DEW, Native Vegetation Branch in relation to potential impacts on clearance of native vegetation however no discussions have occurred, as yet, with the National Park and Public Lands team. <u>Consultation</u> Given the GNWF proposal, is anticipated to impact on the Mokota CP DEW NPPL seek further discussion, to work through the matters raised above. See **ATTACHMENT A** for further details on potential impacts to Mokota CP (12.1) to 12.5))
9	**<u>Impacts across entire Project Area – Roads and fragmentation for MNES: PBTL, FRWL, INTG</u>**
	Table ES1: "Alignment with existing infrastructure and cleared areas, thereby avoiding impacts to native vegetation and MNES habitat".
Table ES 1	<u>Current Statements (Table ES1):</u> The following two statements appear to not address the impact of fragmentation and increased traffic as a result of the proposed roads, on MNES (PBTL, INTG and FRWL): *"Alignment with existing infrastructure and cleared areas, thereby avoiding impacts to native vegetation and MNES habitat".* and *"More than 40 km of existing roads and access tracks have been utilized within WF and OTL. 6.76% of Disturbance Footprint (36.31 ha) occurs within existing cleared areas (such as existing roads), despite only ~1.19% of the GNWF Project Area comprising existing cleared areas."* Whilst DEW appreciates that Neoen have made efforts to minimise clearance by utilising existing tracks, this may in effect cause severe fragmentation and yet unknown consequences to the PBTL populations. Any new roads may create additional fragmentation, noting that the PBTL

Recovery Team have identified concerns regarding PBTL ability to traverse wind farm roads (in general) as they are usually elevated, widened and are often bordered by large rocks and stones. Therefore, the likelihood of PBTL being able to cross the windfarm roads to access the wider population for reproduction and dispersal appears also to be low. The fragmentation potential of modifying the current roads and fragmenting the habitat appears it is likely to have considerable impact on the dispersibility of the species across the site.

DEW draws Neoen's attention to current research underway by Mike Gardner, Professor of Biodiversity and Ecology at Flinders University, also on the PBTL Recovery Team, on Goyder South and Goyder North, to answer key questions on the impact of windfarms on PBTL including that of roads, such as whether the species can cross the roads and whether this results in reduced genetic diversity and reproduction. The outcome of this research would significantly inform understanding of impacts to the species and would contribute to the assessment of significant impact. There is reason for concern that windfarm roads may impact MNES regarding genetic diversity, reproduction and population. It is notable that many windfarms have proceeded on PBTL populations and habitat before this research has commenced, hence considerable impact to PBTL populations may have occurred. Any construction prior to the outcome of this research will not take all potential impacts into account.

FRWL and INTG Road Interaction

Regarding other MNES onsite, the FRWL is similarly small in size and it is questionable whether this species can cross windfarm roads and whether this MNES is also likely to suffer from similar impacts to the genetic diversity, reproduction and population as PBTL. For the INTG and other vegetation, increased widening may result in further removal of vegetation, disruption of weeds and weed seeds held in the soil bank and, combined with increased traffic, could lead to increased distribution of weeds and degradation of INTG and other vegetation. It is notable that the PD states there are at least 14 Declared weeds onsite, many of which are Weeds of National Significance (WoNS), see Table 3.14 (Section. 3.3.7.5., Introduced Flora, p. 85).

Additional Roads, Further Fragmentation

Regardless of the number of hectares or percentage area of roads that align with current roads, the additional roads proposed for the property will result in reduced continuous land mass as land is fragmented into smaller sizes. DEW requests that consideration be given to impacts on the *spatial distribution and subsequent effect* this produces, not just *area* it comprises. Below (left) is a very approximate overlay of the proposed windfarm and existing tracks recorded in DEW databases (below right). The pink highlight shows the roads which are new. Although these may be relatively small in regard to their area (hectares), their placement is effectively likely to cause an increase in fragmentation and increase in edges on the formerly larger paddock sizes. Increases in edge effects generally results in increases in weed, light, and wind infiltration to vegetation and possible impact to reptile populations.

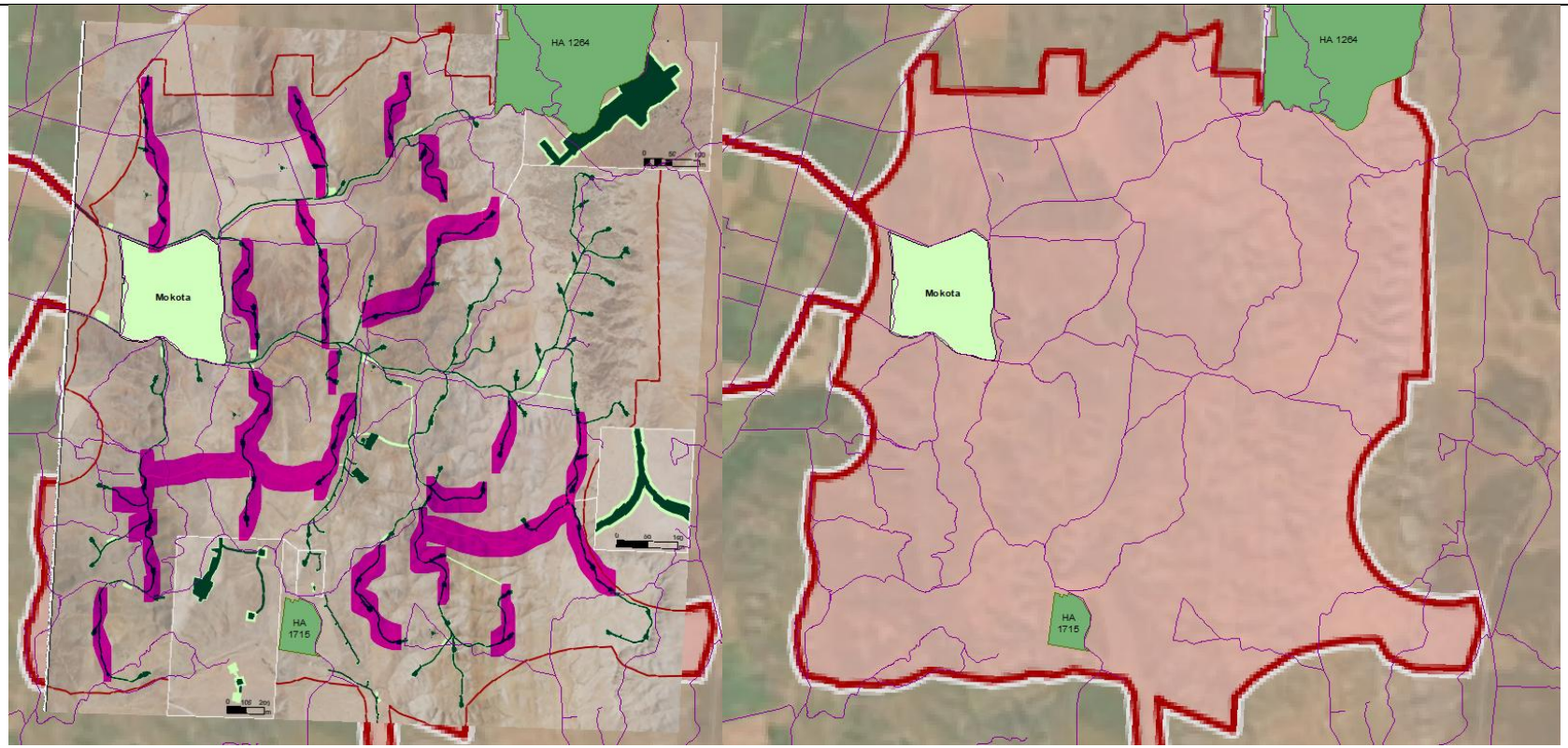


Table 4.7
Pg 102

Possible PBTL Sub populations

DEW is concerned that if PBTLs are affected by fragmentation from roads and other infrastructure, the estimated population of up to 8,991 PBTL individuals could be broken up into multiple sub populations by the wind farm roads, which may ultimately affect the viability of the population (see below re connectivity post-construction of GNWF). DEW provide further information below and recommends this is taken into account in the assessment process:

- Table 4.7, p. 102 of the PD estimates the population of PBTL across the GNWF is between 5,595 and 8,991, which is a significant population that will be fragmented. The map below (left) shows the Project Area with proposed roads taken from the PD, with PBTL BDBSA records overlaid. The map below, right, shows most of the GNWF area is 'Likely' PBTL habitat (yellow). If PBTL cannot traverse windfarm roads, the possible consequence may be that there are numerous subpopulations created on a single windfarm area. The below image illustrates the outcome if PBTL cannot traverse around or over roads, with each possible subpopulation in a different colour. The result of this extreme and approximate estimate is 11 subpopulations. Note, it assumes PBTL cannot 'walk around' long obstructions to reach other populations (see black arrows) and the actual impact of fragmentation may be vastly different; as stated, the exact impact of fragmentatin is yet unknown.

- There are numerous potential outcomes to the issue of connectivity post-construction of GNWF:
  - some subpopulations are too small to be viable and may die, thus reducing the overall population size;
  - some subpopulations, such as larger subpoplations, may continue to survive, but lose genetic diversity, with unknown longterm consequences;
  - PBTL populations deeper into fragemented areas may be more isolated than those on the outer parts of fragmented portions of the landscape (see green arrow);
  - Natural topography may or may not compound the fragmentation caused by windfarm infrastructure (see the underlying terrain, such as rocky hills, which may be unlikely to support burrows and function as natural barriers in addition to the windfarm roads, also see map below, right, which shows unsuitble PBTL habitat as green areas, possibly indicating PBTL on the south side of the Project Area will have less dispersability to northern subpopulations with windfarm roads present).

<u>Onsite Maintenance of Connectivity – Mitigation, a Preferred Option</u>

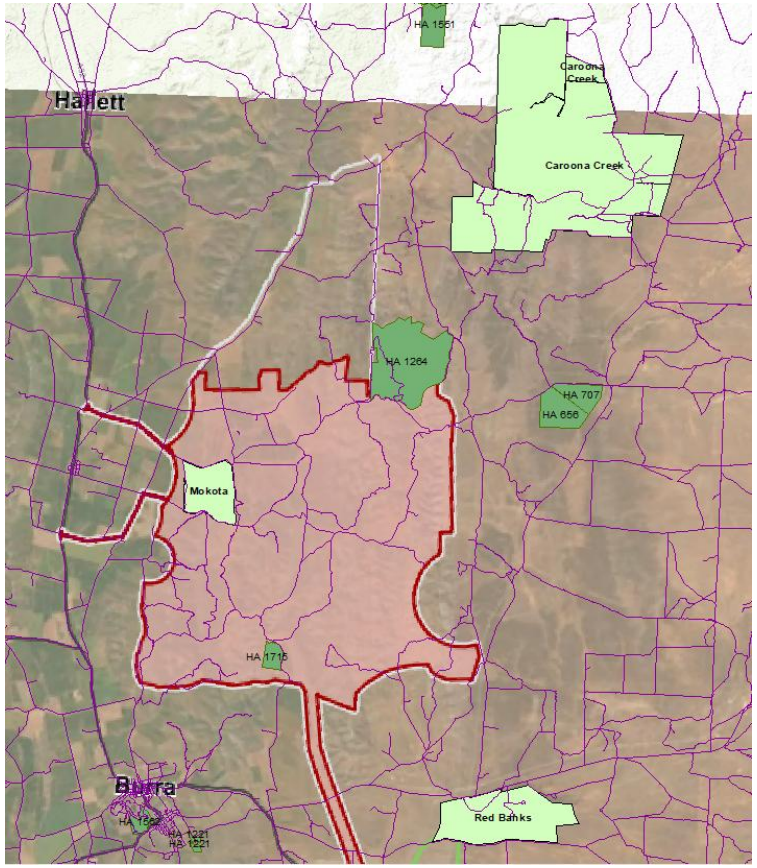
Regarding mitigation measures for fragmentation, has the proponent thought of ways to enable PBTL connectivity in their design, such as through altering windfarm roads so they are traversable, such as through tunnels under roads that are even with the ground? Outcomes from research undertaken on PBTL dispersal on Goyder South windfarm by Gardner will further inform mitigation measures for Goyder North.

PBTL:

	FRWL: A similar situation may also exist for the FRWL in relation to fragmentation and dispersal (Figure 4.11 below, p. 169 of PD illustrates the location where skins and live FRWL were found). DEW suggest fragmentation of the FRWL is also considered as part of the assessment.
10	**<u>Impact Calculations Erroneously Excludes Impact Beyond Clearance and Disturbance Footprint</u>** **MNES: PBTL, FRWL, SWF, BWP, DF, MBC**
	Section 4 of the PD: Wording of Impact should recognise broader changes to the landscape of the Project Area. Current wording appears to reflect impacts as limited to the Disturbance Footprint only.
S 4	Section 4 of the PD phrases the impacts to MNES as limited to the Disturbance Footprint area (i.e. the amount to be cleared) and compares this to the total estimated area of habitat within the Subregional mapping of NVIS. However, this comparison does not appear to recognise the substantial impact that can occur to habitat of MNES through fragmentation and other means. Potential impacts to MNES that cannot be accurately captured in this comparison of Disturbance Footprint alone includes: <u>Pygmy Bluetongue Lizard (PBTL):</u>
Pg 105	Page 105 of the PD states: *"Of the 152,184 ha of potentially suitable habitat in the affected subregions, 368.10 ha is proposed to be impacted, representing 0.24% of the potentially suitable habitat in the subregion."* This does not recognise impacts that fragmentation causes by roads and other infrastructure are likely to exert on the PBTL, as described previously. Impacts are not limited to the suitable PBTL habitat that falls within the Disturbance Footprint, but could be considered to impact all habitat in the Project Area through fragmentation. The total amount of habitat for PBTL is considered to be 10,971.67 to 11,154.14 ha in the Project Area. In consideration of fragmentation by roads, this would result in <u>7.33% of PBTL</u> habitat in the subregions impacted, considerably higher than the 0.24% claimed. <u>Flinders Ranges Worm Lizard (FRWL):</u>
Pg 136 Table 4.20 Pg 139 Pg 133	Page 136 of PD states: "*A total of 3,152.81 ha of the GNWF could be considered Known and Possible habitat in the GNWF Project Area, with 152.10 ha in the Disturbance Footprint"*. Table 4.20 of p. 139 states the total area (ha) of potential habitat impacted by the Project is 153.1 ha, referring to the Disturbance Footprint. Similar to the PBTL, this does not consider the potential for impacts from fragmentation through roads and other infrastructure. Additionally, page 133 of the PD states *"It is noted that a recent study by Woinarski et al. (2023) suggests that the Flinders Ranges Worm-lizard population is now considered stable, and the species no longer meets eligibility criteria for a threatened listing."* However, this species should be considered under the EPBC Act until a formal review of the species' EPBC status confirms otherwise. <u>Blue-winged Parrot (BWP):</u> The BWP was not recorded during field surveys (Section 5.2.1, p. 104, of the GNWF Ecological Assessment) and was not considered to be a regular visitor to the Project Area. Table 4.23 (p. 148) of the PD states the area of potential habitat of the BWP relative to that available in the Subregion (1,620,063 ha) is relatively low (0.03%). However, similar to other examples, the principle of considering impact to a species should still be at the Project Area level, not just Disturbance Footprint level. The PD states (Table 4.22, p. 146) there exists 15,540.66 ha of BWP suitable habitat of the 17,700 ha Project Area. To claim the majority of this habitat remains suitable for a parrot by only calculating the area of habitat within the Disturbance Footprint assumes parrots can safely access the remaining habitat within the Project Area with no reduction in that capacity, which may be unlikely with WTG present.

	Parrots constitute a large proportion of bird mortalities on windfarms. Parrots constituted the majority (39%) of bird strikes recorded on Hornsdale windfarm. If the installation of turbines made the access to habitat in the Project Area unsafe, this would constitute a reduction in habitat quality to nearly **1%** of all BWP-suitable habitat in the subregion, as opposed to just 0.03%. Notably, BWP were observed on Whyte Yarcowie (2) and Twin Creek (3) proposed nearby windfarms, the former constituting 10,026.67 ha (99.603% of the Project Area, 10,066.63 ha)) with BWP area of habitat currently unavailable for the latter. This results in a further 0.62% of BWP habitat fragmented with wind turbines known to cause parrot mortalities, cumulatively totalling **1.62%** of BWP-suitable habitat impacted across two proposed windfarms for which it is able to be calculated with available data. South Eastern Hooded Robin (SEHR): Section 4.2.7 of the PD (p. 11) states: *"Of the 756,979 ha of potentially suitable habitat in the affected subregions, 41.07 ha is proposed to be impacted, representing 0.005% of the potentially suitable habitat available in the subregions."* Section 6.2.3 of the GNWF Ecological Assessment (p. 136) states there is a total of 2,795.87 ha of potentially suitable SEHR habitat in the broader GNREF, with up to 3 breeding pairs estimated to occur in the OTL Disturbance Footprint and 25 to 185 pairs in the broader OTL Project Area in suitable habitat. A total of 8 individuals were observed across three survey observations. Southern Whiteface (SWF) The PD states (p. 129) *"Of the 831,652 ha of potentially suitable habitat in the affected subregions, 57.97 ha is proposed to be impacted, representing 0.007% of the potentially suitable habitat available in the subregions."* No dedicated SWF surveys were undertaken in the OTL, but 9.94ha is mapped in the OTL as habitat for SWF with at least one feature of the listed critical habitat (p. 126 oof PD). Diamond Firetail (DF) The PD states (p. 401) *"The Disturbance Footprint associated with the Project may impact upon potentially suitable habitat for the Diamond Firetail across the Project Area, resulting in an estimated maximum potential impact area of 23.53 ha in the WF and 7.89 ha along the OTL. Of the 347,531 ha of potentially suitable habitat in the affected subregions, 31.42 ha occurs within the Disturbance Footprint, representing 0.009% of the potentially suitable habitat available in the subregions."* Does this consider the suitable habitat in the overall Project Area that could suffer impacts from fragmentation and other sources (see Section 2g of this document)? It is also important to consider the cumulative impact where the DF has been impacted by other proposals in the region. Mallee Bird Community (MBC): Section 4.16.6 of the PD (p. 238) states just 0.76 ha of suitable MBC habitat is in the Disturbance Footprint. It appears based on the description and Figure 4.43 of the PD that impact is considered limited to the Disturbance Footprint and does not consider fragmentation or other impacts.
S 4.2.7 Pg 11	
Pg 129	
Pg 401	
S 4.16.6 Pg 238	
11	**Avoidance Behaviours and Edge Effects Mitigation Comments**
S 5.2.2 Pg 263	**Section 5.2.2 Displacement of Fauna through Edge Effects or Avoidance Behaviours, of the Preliminary Documentation, page 263,** states that edge effects from the wind farm and the potential tendency of fauna to avoid the proposed windfarm are mitigated by the fact it is placed adjacent conservation reserves:

	"Additionally, it is noted that large areas of habitat under conservation directly adjoin the Project Area of the GNWF (i.e. Mokota CP, Tiliqua Nature Reserve, and Mongolurring Nature Reserve), further mitigating the potential impacts of edge effects." This statement appears to soften the description of impacts to fauna as a result of the GNWF and holds many assumptions. These *assumptions* include: • *At least some fauna residing on GNWF and some fauna utilising GNWF from other areas travelling to the site, will instead be able to find equally suitable and available habitat in the adjacent reserves instead, thus impacts from the GNWF will be mitigated due to its placement adjacent conservation reserves;* • *Habitat within the reserves provides the same resources as that present on GNWF;* • *The reserved habitat is not already full at carrying capacity with fauna already using these reserves with established territories;* • *Habitat in reserves is superior to that on GNWF, however there are many resources on this site (GNWF) that are not likely to be provided by a reserve;* • *Suitable habitat nearby GNWF (i.e. reserves) will not act as an attractant, with the adjacent windfarm infrastructure (which they may attempt to pass through) known to cause animal mortalities will not likely act as a sink*. An example that challenges these assumptions where particular resources may be present on GNWF (and not easily replicable on reserves) would be in relation to raptors as a fauna group, which require the resource of space surveillance, hunt and undertake aerobatic displays. Although the reserves may support considerably more native vegetation and in better condition than that on GNWF Project Area, they are of restricted size, will be fragmented even further by the landscape with turbines, are often comprised of elevated land masses and treed areas with considerable vegetation ground cover rather than open plains where there is high visibility of prey. The farmland of GNWF (without turbines) currently provides such resources. Raptors comprise a significant proportion of the bird mortalities on wind farms due to the installation of turbines. The installation of turbines, particularly of such high concentration as indicated by the proposal between reserves, is almost certain to cause raptor mortalities. The presence of reserves adjacent the GNWF is not likely to provide alternative habitat that is not already taken up by species. The installation of turbines at GNWF will result in a net loss of open space for raptors to safely hunt. The statement that impacts to fauna species that value the current habitat at the proposed GNWF will be mitigated by the presence of reserves adjacent the GNWF requires justification as to which fauna species this applies to and the addressing of the above assumptions.
S 5.2.2	The statement in Section 5.2.2 Displacement of Fauna MNES through Edge Effects or Avoidance Behaviours, of the Preliminary Documentation, page 263: "Impacts as a result of edge effects associated with GNWF are considered to be minimal, as the Disturbance Footprint is typically narrow and linear and will utilise existing roads, tracks and corridors where practicable, with habitat outside of the Disturbance Footprint expected to remain intact and of the same or improved quality due to improved land management practices." This statement downplays impacts as a result of Edge Effects and Avoidance Behaviours of fauna. Raptors and parrots are known to comprise a significant proportion of mortalities as a result of wind turbines, with Hornsdale windfarm detecting 72 bird deaths from 13 bird species, across 5-7 turbines monitored of the 99 present.



12	**Post construction Monitoring**
	DEW understands that improvements are being made over time on assessment methods for many developments, including wind farms, although there remains areas where impacts on species require further studies, such as birds. Issues with past post-construction monitoring, as seen with the Hornsdale Windfarm, are: • Short time frame (5 year monitoring does not allow the influence of climate variability on species to be elucidated and distinguished from impacts on species from turbines); • Habitat variability (the sample of turbines monitored are selected from a single habitat type rather than enough sampled from the variety of habitats that occur on windfarms to enable predictions of avian mortalities per turbine to be derived); DEW recommends this is improved, so that predictions of mortalities of birds per turbine can be ascertained and over a 10-20 year time frame to account for climate variability. A similar approach (considering climate and habitat variability and length of monitoring time) is recommended to be considered for other species (including MNES) monitored post construction also.

13	**Windfarm Design**
	DEW provides the following information for consideration on improved windfarm design: • To reduce bird collisions an improvement to paint 1/3 of turbine blades black which was trialled in Norway and found a 71.9% reduction in bird strikes at turbines, with considerable improvements for raptors, including the White-tailed Eagle, similar to our Wedge-tailed Eagle. Cost of this is likely minimal if done pre-construction. This experiment is now being tested by the Oregon State University. • Detection systems (that run on underground cables as opposed to wireless technology to avoid artificial EMR emissions on sites) may be useful in improving avian safety (Gémard et al. 2024). **References:** Gémard, C., Duriez, O., Chappe, O., Duclos, G., & Besnard, A. (2025). Towards a better understanding of avian collision in wind energy facilities using automatic detection systems. *Journal of Applied Ecology*, 62, 1437–1448. **https://doi.org/10.1111/1365-2664.70055** Lloyd JD, Butryn R, Pearman-Gillman S, Allison TD (2023) Seasonal patterns of bird and bat collision fatalities at wind turbines. PLoS ONE 18(5): e0284778. https://doi.org/10.1371/journal. pone.0284778 Nealon, S. 2024, Scientists studying impact of painting wind turbine blade black to reduce bird collisions, Oregon State University Newsroom, URL: https://news.oregonstate.edu/news/scientists-studying-impact-painting-wind-turbine-blade-black-reduce-bird-collisions> Schippers P, Buij R, Schotman A, Verboom J, van der Jeugd H, Jongejans E. Mortality limits used in wind energy impact assessment underestimate impacts of wind farms on bird populations. Ecol Evol. 2020; 10: 6274–6287. https://doi.org/10.1002/ece3.6360.
14	**EPBC Act – National Heritage Places**
	Australian Cornish Mining Sites: Burra and Moonta
	The Australian Cornish Mining Sites: Burra and Moonta is a National Heritage Place (NHP). The Burra mine site is within this NHP and is also within the Burra State Heritage Area. The Australian Cornish Mining Sites: Burra and Moonta was added to Australia's Tentative World Heritage List on 3 September 2024. The proposed wind farm may impact views from the Burra mine site. The WTGs with the most visual impact on the Burra mine site when viewed from Burra are the nine WTGs located in the south/east corner of the site (WTG001,2,3,5,6,14,15,16,17) as shown pg. 37 of the Neoen PDs. The number of WTGs appears to have been from the previous proposal. DEW considers clarification is needed due to some discrepancies in relation to the number of turbines proposed: • The 1 Feb 2024 Heritage Impact Statement states there will be 135 turbines

	• The variation letter dated 4 June 2025 is requesting 99 turbines, increased from 92 turbines. • 2.2.1 (pg. 19) The Neoen October 2025 report states the project will be up to 99 WTGs. However, Figure 2.2 (pg.37) shows 138 turbines. Further the citing of the WTGs and certainty that views of the WTGs are minimised as much as possible shall be incorporated into the assessment.
	Potential corrections
15	**PBTL population – possible error**
	Table 4.7 of the PD, p. 102, states the estimated PBTL population is between 8,991.03 and 5,595.55 individuals on the GNWF. However, 0.51 multiplied by 17,703.63 equals 9,028.85. Is this correct?

ATTACHMENT A – STATE MATTERS

Government of South Australia - Response Document: Goyder North Renewable Energy Facility

Documents: Preliminary Documentation for Goyder North Renewable Energy Facility Stage 1, Burra, SA (EPBC 2024/09929)

Document date: 24 November 2025

Comment/ Reference	**State matters under the following legislation:** • ***National Parks and Wildlife Act 1972*** **(NPW Act)** • **Aboriginal Heritage Act 1988** • ***Landscapes SA Act 2019*** • ***Heritage Places Act 1993***
1	**National Parks and Wildlife Act 1972 -**
Table 6.1 P 169	<u>Wedge-tailed Eagle Nests - Turbine Set Back</u> The proposal states in Table 6.1 of Section 6.1.2, p. 295 of the PD that the buffer distance of turbines from Wedge-tailed Eagle (WTE) nests will be "*Determined in consultation with qualified ecologists based on nest activity and location.*" The criteria and basis of the proposed buffer should be detailed in the PD's. <u>State Rare Elegant Parrot – potential impacts</u> DEW suggests that impacts on fragmentation of habitat is considered for SA's State Rare Elegant Parrot which had 13 individuals recorded onsite at GNWF (p. 169 of the GNWF Ecological Assessment). <u>Manage, control or destroy protected wildlife</u> As part of undertaking this action, Neoen will be required to manage, control or destroy protected wildlife under the South Australian *National Parks and Wildlife Act 1972*, the proponent should be aware there may be permitting requirements that apply. Further information can be viewed at the Department for Environment and Water's website at: https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/permit-types/manage-control-destroy-native-animals
2	**Heritage Places Act 1993 – Burra State Heritage Area**
	The Burra State Heritage Area is a State listed Heritage Area under the *Heritage Places Act 1993*. The proposed wind farm will impact views from the Burra mine site, which is one of the most significant sites within the Burra State Heritage Area under the *Heritage Places Act 1993* (SA).

	It is unclear if any road alterations in or around Burra will be required when transporting the turbines to site. The report states that transport will be via Barrier Highway. If Copperhouse Road will be used, there may be impacts to the surrounding roadsides in this section of the State Heritage Area. As described in Enclosure 1, this area is also recognised as a National Heritage Place (NHP) being the "The Australian Cornish Mining Sites: Burra and Moonta" which is currently on Australia's Tentative World Heritage List.
3	***Native Vegetation Act 1991***
	Any clearance applications must be made pursuant to the *Native Vegetation Act 1991* to the Native Vegetation Council
4	***Hydrogen and Renewable Energy Act 2023* (HRE Act)**
	Neoen has submitted an application under the HRE Act for a Renewable Energy Infrastructure Licence which is under assessment at the Department for Energy and Mining.
5	***Aboriginal Heritage Act 1988* authorisations**
	The application made by Neoen to the Aboriginal Affairs and Reconciliation Division of the Attorney General's Department for authorisations under sections 21 and 23 of the *Aboriginal Heritage Act 1988* (SA) is currently being consulted on and pending a decision from the Minister of Aboriginal Affairs.
6	***Landscapes SA Act 2019* (and the *Commonwealth Water Act 2007*)**
	The Project area is not located within a Prescribed Wells Area or a Prescribed Water Resource Area. From the documentation, provided DEW understands that water supply for construction and maintenance purposes is still being investigated, including local groundwater supplies (Water supply requirements (including concrete batching plant requirements) for Project construction and operation is anticipated to be accessed at the site through transportation tanks that will be stored at various facilities. The viability of a number of privately owned groundwater bores across the Project Area is currently being investigated. Goyder North Wind Farm SIA). The proposed Overland Transmission Line (OTL) is discussed as crossing Burra Creek. Burra Creek wetlands near Worlds End are briefly discussed as a baseflow dependent wetland currently described by the South Australian Environment Protection Authority (EPA) as being in fair condition. Please note the following regarding Burra Creek Catchment: o The Burra Creek Catchment is the only tributary from within the SA Murray Region considered connected to the River Murray o Consequently, the North and South Burra Creek Catchments are collectively listed as a Priority Environmental Asset within the Murray Darlin Basin Plan (Matter 8 asset). This requires the South Australian Government to report every 5 years on "the achievement of environmental outcomes at an asset scale" under the Basin Plan.

	o The last Matter 8 report was released 2024, Link: BP-Evaluation_Matter8_Murray-Region-Evaluation_2024.pdf o DEW notes that the report states that "the OTL is proposed to cross over Burra Creek, however no impacts are anticipated." We note the report also states that "any potential localised impacts as a result of the Project will be mitigated through the CEMP(Construction Environmental Management Plan)/OEMP (Operational environmental Management Plan) and associated erosion and sediment control measures". Further, the report is unclear as to whether the western margin of the windfarm intersects the northern Burra Catchment as described in the Matter 8 report and if so, whether impacts have been considered. o The applicant correctly notes that "A water affecting activity permit may be required for the Project for construction of access tracks across creek lines (i.e. Burra Creek). DEW understands that Neoen will implement standard sediment and erosion control procedures as part of a Construction Environmental Management Plan (CEMP) which will ensure that actions will not alter the natural flow of water within the Project Area and mitigate against sediment and erosion occurring, particularly around creek lines. DEW anticipate that the CEMP and the OEMP are still in development. DEW suggest that on this preliminary assessment, these plans consider potential impacts to the Burra Creek Catchment with respect to the area defined as a Priority Environmental Asset under the Murray Darling Basin Plan. Future Consultation with DEW team members familiar with the Matter 8 issues is recommended.