

INDEPENDENT ENVIRONMENTAL REPRESENTATIVE AUDIT REPORT

BOCO ROCK WIND FARM

1ST AUDIT

VERSION 2

SEPTEMBER 2015



AUDITED ORGANISATION	PROJECT
Boco Rock Wind Farm Pty Ltd	Boco Rock Wind Farm
LOCATION OF AUDIT	PROPOSED DATE OF AUDIT
Operations Office, Boco Rock Wind Farm	25 th and 26 th August 2015
DEPTH OF AUDIT	SCOPE OF AUDIT
Environmental	Compliance with Project Approval Compliance with approved project environmental management plans
AUDIT CRITERIA	AUDIT DETAILS
Project Approval and approved OEMP	Opening Meeting – 25/08/15, 10:30am Closing Meeting – 26/08/15, 3:30pm
PROJECT REPRESENTATIVES REQUIRED TO BE AVAILABLE	AUDIT TEAM
Mark Wiggins	Nick Graham-Higgs, NGH Environmental – Lead Auditor
Brett Jones	Jane Mills, NGH Environmental – Assistant Auditor
AUDIT REPORT	
An Audit Report will be submitted within 21 days of completion of the audit	
PREVIOUS AUDIT DATE	PREVIOUS AUDIT REFERENCE
None	None

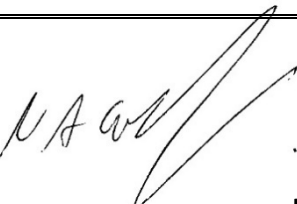
AUDIT SUMMARY**Environment:**

This was the first environmental compliance audit of the operation phase of the Boco Rock Wind Farm (BRWF) by the Independent Environmental Representative (ER). It involved an audit of compliance with the approved Operation Environmental Management Plan, the NSW Department of Planning Project Approval and the Commonwealth EPBC Approval.

The audit included interviews, desktop-based review of records and plans and a site inspection. Site and project knowledge collected during previous inspections conducted by the ER were also relied upon.

The audit found broad compliance was being achieved. The OEMP is being fully implemented and all NSW and Commonwealth conditions of approval are being met. There are several instances where the OEMP requires updating, either to reflect the current situation at the site or to include additional information that should assist the operation phase of the project to continue to be fully compliant.

In total, zero Corrective Action Requests and five Observations of Concern were issued at the close-out meeting. Seven (7) Opportunities for Improvement were also identified.

Signed: _____**Principal's Representative****Date:****Signed:****Lead Auditor****Date: 21/09/2015**

Contents

1. REPORT SUMMARY.....	5
1.1 Introduction.....	5
1.2 Scope of Audit	5
1.3 Audit criteria.....	5
1.4 Summary of audit results	6
2 AUDIT PROCESS	10
2.1 Opening Meeting.....	10
2.2 Closing Meeting.....	10
2.2 Site Inspection	10
2.3 Designated Follow-up.....	10
2.4 Previous Environmental Audit.....	10
Appendix A OEMP Details of Audit Findings	11
Appendix B NSW Approval conditions DETAILS OF AUDIT FINDINGS	56
Appendix C Commonwealth EPBC Conditions – details of audit findings.	73
Appendix D Observation of concerns.	77

1. REPORT SUMMARY

1.1 INTRODUCTION

This audit represents the first (1st) independent environmental representative compliance audit conducted during the operation phase of the BRWF Project.

This report is Version 2 of the audit report. Version 1 was issued on the 31 August 2015. The Audit has been re-issued following receipt of additional information from Boco Rock Pty Ltd relating to an Observation of Concern raised for Conditions 2.17 and 2.18 of the NSW Project Approval. This OoC related to reporting requirements for operational noise.

1.2 SCOPE OF AUDIT

The following plans and approvals were audited:

- Implementation and compliance with the environmental aspects of the BRWF Operation Environmental Management Plan (OEMP)
- Project Approval, NSW Department of Planning, Boco Rock Wind Farm Pty Ltd
- Approval, Boco Rock wind farm, south west of Nimmitabel, EPBC Ref 2009/4905, dated 29/9/2010
- Variation to conditions attached to approval, Boco Rock Wind Farm project, dated 12 November 2012 (vary condition 2)
- Variation to conditions attached to approval, Boco Rock Wind Farm project, dated 12 March 2013 (vary Condition 3)

1.3 AUDIT CRITERIA

The following criteria was used when classifying items raised during the audit.

Corrective Action Request (CAR). The issue of a CAR occurs when it is considered there is a deficiency in meeting specified requirements and if not rectified, pose a high risk to environmental impact and/or non-compliance to the approved Project OEMP's.

Observation of Concern (OoC). The issue of an OoC occurs when it is considered there is a deficiency in meeting specified requirements, which if not addressed, may lead to a risk of non-compliance.

Opportunity for Improvement (OFI). These are not considered to be non-compliances but are additional measures that could be undertaken to assist in meeting specified requirements, which if not addressed, may lead to a risk of non-compliance.

1.4 SUMMARY OF AUDIT RESULTS

1.4.1 Operation Environmental Management Plan

An audit of the implementation of the Operation Environmental Management Plan identified the following non compliances and opportunities:

- No Corrective Action Requests
- Three (3) Observations of Concern
- Seven (7) Opportunities for improvement.

Observation of Concerns and Opportunities for improvement were identified and explained to CWP Renewables during the audit Closing Meeting. Observations of Concern are discussed further in Appendix A.

Category	Item No	Section of Report	Details
OoC	1	3.0 – 3.5, 3.7	Organisational structure and specific role responsibilities have not been updated to reflect the existing structure.
OoC	2	6.3	The reptile management plan outlines procedures for relocation of the GED if the University of Canberra can't pick the individual up. Four relocation sites have been identified within the wind farm site. There was a lack of information in the OEMP and no staff knowledge regarding the location of these sites. The OEMP should be updated to include the appropriate relocation sites and relevant site personnel should be informed of their locations.
OoC	3	7.3	Rehabilitation success varies across the site. While some areas have a good cover of vegetation, there are some areas containing large amounts of bare soils that require reseeding (refer photo 1 and 2)
OFI	1	4.1	Several systems were in place to track critical dates for compliance, inspections, audits and reviews including the compliance register, office wall calendar and an outlook shared calendar titled Environment and community calendar. A centralised system is recommended and it is suggested to continue working towards the single shared calendar system that is currently being developed. The name of the shared calendar could be changed to Compliance Environment and Community Calendar
OFI	2	4.3	The compliance register should be renamed BRWF_R_21_ Compliance Register to be consistent with the OEMP.

Audit Report Number: 1

Category	Item No	Section of Report	Details
OFI	3	5.3	This management strategy requires that where an environmental impact is observed, including soil erosion, sediment run off or release of hazardous materials regardless of severity, that an <i>Environmental Incident Report</i> is lodged and investigated and that that records are to be maintained according to the requirements of the Environment Protection Licence (EPL), part 4 M1 and M2. The incident form was observed. To ensure conformance to the EPL, the form should be updated to include method of complaint and reason for no action taken (if applicable).
OFI	4	6.5	This strategy requires a monthly inspection of vehicles for weed seeds. A more adhoc approach is suggested to be based on opportunistic inspections after rain and when dirty or new vehicles come to site. The frequency of weed inspections could be changed from monthly to routine or as required .
OFI	5	5.3	<p>A management strategy requires that checks to ensure erosion and sediment controls are achieving design function are to be undertaken six monthly for the first two years and every two years after that to ensure that controls are reducing water velocities and soil is not being transported. During the site inspection the following improvements were identified to improve function of the sediment control system:</p> <ul style="list-style-type: none"> • at the intersection of Wind Turbine Generator (WTG) 61, rip rap could be placed in the drain leading to the sediment basin (refer photo 3) • north of WTG 61, rock checks could be installed on the northern side of the track to slow water and reduce erosion from occurring (refer photo 4) <p>In addition, the management strategy (first line item, page 30 of the OEMP) only requires that checks are made. This should be updated to ensure an action is taken if design function is not working effectively.</p>
OFI	6	5.5	The last line item in the Monitoring and Inspection Table (page 32) for soils and water management states 'Assessment of mitigations to DoPE and refers to a time frame for this to be undertaken 'within 3 months after first 24 month period of operation' This line item should be clarified or deleted. The site is subject to periodic auditing requirements and these reports would be submitted to the DoPE at the required time intervals.

Audit Report Number: 1

Category	Item No	Section of Report	Details
OFI	7	6.3	<p>Management strategy 3 refers to identifying flora and fauna on site and states that details of how to identify all flora and fauna on site should be included in the site induction package. To reduce the scope of the site induction, it is suggested to update the wording of this strategy similar to below with the highlighted words included.</p> <p><i>Provide as part of the Site Induction Package and on information boards on site, details of how to identify significant flora and fauna expected on Site, along with species considered dangerous (eg. Snakes).</i></p> <p>In addition, management strategy 8 (Sighting of weeds) should be updated so that only target or priority weeds species are required to be reported to the BRWF Site Manager. For example,</p> <p><i>Any observation of target or priority weed species should be reported to the BRWF Site Manager or delegate. Weed identification charts (see Appendix G) provided on Site Information Boards and information included in Site Induction Package.</i></p>

Audit Report Number: 1

1.4.2 NSW Project Approval

An audit of the implementation of the Operation phase of the NSW Project Approval identified the following non compliances and opportunities

- No Corrective Action Requests
- **One (1)** Observations of Concern
- No Opportunities for improvement

Observation of Concerns were identified and explained to CWP Renewables during the audit Closing Meeting. Observations of Concern are discussed further in Appendix B.

Category	Item No	Condition	Details
OoC	1	2.17 and 2.18	There are no noise agreements in place with the landowners therefore, operational noise at all residences must meet the criteria in 2.17. It was unclear at the time of the audit, whether the noise assessments being undertaken by SONUS covered all landowners, involved and uninvolved, to ensure these conditions are being appropriately met. Following the audit advice from Brett Jones, CWP Renewables Pty Ltd was received and stated that the noise report being developed would be in full compliance with the planning conditions.
OoC	1	4.1 (f) Compliance Tracking Program	This condition requires that the compliance tracking program includes provisions for reporting environmental incidents to the Director-General during construction and operation. Both the OEMP and the Emergency Response Plan (ERP) does not include provisions for reporting environmental incidents to the Director-General. In addition, it was noted that the hard copy ERP that is available to all staff was not the most current version.

1.4.3 Commonwealth EPBC Approval

An audit of the implementation of the Operation phase of the EPBC Commonwealth approval identified:

- No Corrective Action Requests.
- No Observations of Concern.
- No Opportunities for Improvement

Refer Appendix C for full details

A large number of the conditions are relevant to the construction or decommissioning phase. Those relevant to construction have been previously audited and were closed out in the November 2014 audit of Commonwealth Conditions. It is recommended that the results of this audit be sent to the Commonwealth and advice sought as to whether further compliance reporting for the operational phase of the wind farm is required.

2 AUDIT PROCESS

2.1 OPENING MEETING

An opening meeting was held on the morning of the 25th August 2015, attended by

- Mark Wiggins, CWP Renewables
- Nick Graham-Higgs, NGH Environmental
- Jane Mills, NGH Environmental.

2.2 CLOSING MEETING

A closing meeting was held in the afternoon of the 26th August, attended by

- Mark Wiggins, Site Manager BRWF, CWP Renewables
- Brett Jones, Operations Manager BRWF, CWP Renewables
- Nick Graham-Higgs, NGH Environmental
- Jane Mills, NGH Environmental

2.2 SITE INSPECTION

A site inspection of roads, WTG hard stands, drainage and revegetation progress in Collector Group 1 was undertaken on the 26th August with Mark Wiggins.

2.3 DESIGNATED FOLLOW-UP

A follow-up of the audit findings will be managed by the respective Project representatives from CWP Renewables to verify the completion of items identified as Observations of Concern. The next ER Audit will be scheduled following consultation with CWP Renewables

2.4 PREVIOUS ENVIRONMENTAL AUDIT

No previous audit of the operation phase has been conducted.

APPENDIX A OEMP DETAILS OF AUDIT FINDINGS

This section details the findings of the OEMP audit that require action. The full Audit Protocol checklist is also included. No previous audit of the operation phase of the OEMP has been conducted.

A.1 ORGANISATIONAL STRUCTURE AND RESPONSIBILITIES

The organisational chart in Section 3.0 of the OEMP describes the environmental management hierarchy for the operational phase of the Boco Rock Wind Farm. The chart requires updating to reflect the existing organisational structure at the wind farm. The roles and responsibilities included in Section 3.1, 3.2, 3.3, 3.4, 3.5 and 3.7 also require updating or deleting where applicable to reflect the current situation.

Observation of Concern 1

A.2 REPTILE MANAGEMENT PLAN

BRWF has an ongoing responsibility post construction to protect all threatened species including the following threatened reptile species:

- Grassland Earless Dragon
- Little Whip Snake
- Striped Legless Lizard

The OEMP identifies that activities such as the excavation of ground outside of the formed hardstands and roads, including rehabilitated areas, could cause disturbance to these species potentially resulting in the death of a threatened species and penalties under both State and Commonwealth regulations. Application of the Reptile management plan is the proposed mitigation strategy for this risk.

The plan includes the procedures that must be followed in the event that any of these species are found on site either as part of an excavation activity or as an incidental sighting. It includes the requirement to relocate these reptiles to any of four relocation sites that have been previously identified.

There is no reference to the location of these relocation sites in the OEMP. At the time of the audit, BRWF staff were also unaware of the existence and location of these sites. **Observation of Concern 2.** It is recommended that the OEMP is updated to include a map or description of these sites.

It should be noted that there are specific requirements for the Grassland Earless Dragon if the species is found between June and October. Relocation of the species to these sites should only be undertaken if the University of Canberra cannot arrange pick up of the individual.

A.3 LANDSCAPE AND REHABILITATION PLAN

The OEMP requires that rehabilitated areas be maintained to ensure the effective of the rehabilitation. Maintenance is required until an independent and suitably qualified expert determines it to be well established, in good health and self-sustaining.

A site inspection of Collector Group 1 revealed varying levels of rehabilitation success across the site (refer photos 1 and 2). While some areas have a good cover of vegetation (for example the Brechnoch Road entrance) there are other areas, mostly roadside batters, which contain large amounts of bare soils that require reseeding. One small section of a batter also required rebuilding following a minor slump or the diggings of a wombat.

Observation of Concern 3.

Audit Report Number: 1

The adverse impact of stock on site during the rehabilitation process was discussed. There may be an opportunity to request landholders remove or reduce stock levels until rehabilitation has established. It is also noted that the EPC Contractor (Downer EDI) has been notified of rehabilitation requirements and plans for the contractor to return to site are progressing.

A.4 SITE INSPECTION PHOTOS

Photo 1 – effective rehabilitation at WTG 60



Photo 2 – example of rehabilitation that required reseeding near WTG 61



Photo 3 – installation of rip rap uphill of the larger rocks would assist in slowing water and would improve function of the sediment pond system



Photo 3 – installation of the rock checks within the drainage line would slow water and reduce erosion risks.

A.5 AUDIT PROTOCOL

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
Environmental Policy					
2.20	Is the Environmental Policy displayed in a prominent location in the Service Compound? It is a central component of the Site Induction training for all Site Staff?		Compliant	Observed entrance to site compound	N/A
Organisational Structure and Responsibilities					
3.10	Does the Operations Manager have primary responsibility for the tasks outlined in this section		OoC	Organisational structure has not been updated. For example, OM undertakes the EO role now.	N/A
3.20	Does the Environment Officer have primary responsibility for the tasks outlined in this section			All responsibilities have not been updated to reflect existing situation	N/A
3.30	Does the BRWF Site Manager have primary responsibility for the tasks outlined in this section			All responsibilities have not been updated to reflect existing situation	N/A
3.40	Does the BRWF Site Engineer have primary responsibility for the tasks outlined in this section			All responsibilities have not been updated to reflect existing situation	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
3.50	Does the Communications Officer have primary responsibility for the tasks outlined in this section			All responsibilities have not been updated to reflect existing situation	N/A
3.60	Has an ER been appointed to undertake the responsibilities in this section		Compliant	ER appointed.	N/A
3.70	Does the Site Staff have primary responsibility for the tasks outlined in this section		OoC	All responsibilities have not been updated to reflect existing situation	N/A
3.80	Do Subcontractors and Consultants undertake the activities they are required to in this section		Compliant		N/A
3.90	Do all visitors to the site undergo a Site Induction and acknowledge their understanding by signing the Site Attendance Log Book		Compliant	Induction records observed. Sign in attendance board observed.	N/A
Management Systems					
4.10	Is an information and document management system being maintained		Compliant	WIKI system utilised during audit to find required documentation. Environmental policy, rainfall register and forms relevant to incident management, including the incident register were observed.	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
4.10	Is a Project Calendar being maintained on the document management system to record and alert staff to all critical dates for compliance, inspections, audits and reviews?		OFI	3 systems observed. Compliance register which includes due dates, wall calendar in office and an outlook shared environment and community calendar. Suggestion to use the outlook calendar as the centralised system and rename it compliance environment and community calendar.	N/A
4.20	Is a risk management assessment procedure being maintained? Are project risks are reviewed at least annually or as required based on events, legislative changes and project updates?		Compliant	Risk assessment has been undertaken as part of OEMP. Reviewed annually with review of the OEMP.	N/A
4.30	Is compliance with planning conditions being tracked through an electronic compliance management system?		Compliant	Observed	N/A
4.30	Is a compliance register (BRWF_R_21_Compliance Register) maintained which lists all the relevant legislation and regulations that are applicable to the Site? Is it reviewed annually as part of the internal management review process?		OFI	Yes, register observed. Register needs to be renamed BRWF_R_21_Compliance register	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
4.40	Is an Annual Return supplied to the EPA each year? Is a Monitoring Report supplied with the Annual Return? Are the due dates noted in the Project Calendar?		Compliant	Submitted 16 July 2015. Email to EPA and the return observed.	N/A
4.50	All Site Staff, subcontractors and consultants will be required to undergo a comprehensive Site Induction which will include information on standard environmental practices on Site.		Compliant	Observed site induction packages and the training register.	N/A
4.50	Does the site induction Package (BRWF_TP_01_Site Inductions) contain a detailed slide presentation and include information on: <ul style="list-style-type: none"> · An outline of the OEMP structure; · Key environmental risks and requirements; · The roles and responsibilities of Site Staff, subcontractors and consultants in relation to environmental management; and · An outline of the process for recording Environmental Incidents. Is there an assessment at the end to ensure the key items are understood? 		Compliant	All induction packages observed. Files in training folder of the WIKI	N/A
4.50	Is training provided to all Site Staff to ensure that they are aware of environmental issues and, where required, are staff trained in specific areas related to their work, including proper use of tools and equipment?		Compliant	Training register observed.	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
4.60	Is the incident reporting protocol BRWF_PR01_Incident Reporting being followed in the event of an environmental incident? Is the procedure available to all Site Staff		Compliant	Available in the ERP. Reporting protocol to be updated to include reporting to the DG. Refer NSW Approval 4.1 (f)	N/A
4.60	Is an environment incidents register maintained on the BRWF document management system; BRWF_R_06 Environmental Incident Register? Are all Site Staff familiar with the system and do they use it to report incidents?		Compliant	Observed. One incident management register for all types of incidents	N/A
4.60	Does the environment incidents register record the action taken to manage the incident based on the various management strategies outlined in the OEMP and associated sub plans.		Compliant	Incident Register observed. Action (if relevant) is recorded under the comments column. Actions taken recorded on the individual incident form.	N/A
4.60	Does the BRWF Site Manager and Environment Officer maintain an automated watch on the register for new or changed entries		Compliant		N/A
4.60	Has there been an incident that was likely to cause significant off Site impacts on people or the environment? Where the relevant Local		N/A		N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	Authorities, State and Commonwealth authorities notified?				
4.70	Is an advertisement placed in local newspapers every year during the operations phase to communicate the website address, email, postal address and telephone number for complaints?		Compliant	Advertisement placed annually. Managed by the compliance register and compliance calendar. Next one is due for the 6 September 2015	N/A
4.70	Is the same information (as above) provided on signage at the following locations: 1. Dummy Lane off Springfield Road, 2. Avon Lake Road and The Snowy River Way, at main Site entry		Compliant	Yes, signage observed.	N/A
4.70	Are all complaints, including environmental complaints, are recorded on BRWF_R_03_ Complaints Register? Does the register include the fields listed in this section of the OEMP		Compliant	No complaints at time of audit. Register Observed. Daily call activity sheet is forwarded to Site Manager from the call centre weekly. A number of phone calls have been received (approximately 3) but no information has been given to know what the complaint is about or who has complained. Complaint has not therefore been registered.	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
4.70	When complaints are received and relate to environmental issues, is the BRWF_PR_02_ Complaints Procedure will followed as per this section?		Compliant	No complaints received to implement the complaints procedure.	N/A
4.80	Does the BRWF Site Manager regularly review the environmental performance of service activities and compliance with the OEMP		Compliant	Monthly inspections by OM	N/A
4.80	Are Regular inspections of Site activities and environmental performance undertaken by the Environment Officer, the BRWF Site Manager and the managers of both the WTG Maintenance Contractor and the BoP Contractor? Are the site inspections recorded on BRWF_F_01_ Inspection Check List?		Compliant	Monthly inspection sheets observed. One for the site, one for the compound.	N/A
4.80	Are items identified during an inspection that require investigation managed through the incident management system?		Compliant	Incident register observed	N/A
4.90	Has the project been subject to an independent audit within two years of the commencement of operation of Stage One? Does the audit assess the following:		N/A	ER is undertaking the role. Subject of current audit	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	<ul style="list-style-type: none"> - Assess compliance with the requirements of the CoA, the Project Statement of Commitments, the EPL and any other licenses and approvals that apply to the Project; · Review the effectiveness of the environmental management of the Project; and · Review the adequacy of BRWF's response to environmental incidents and complaints made about the Project. 		N/A	Audit currently been undertaken.	N/A
4.90	Are the audit reports provided to DoPE and DoE and is a summary of audit results published on the Boco Rock Wind Farm public website?		N/A		N/A
4.10	Are matters of non-conformance with the Project planning approval or matters of environmental harm that require corrective actions, entered on to the Corrective Action Register so that a Corrective Action Request (CAR) is generated.		N/A		N/A
4.11	Has the OEMP been reviewed within three years of the commencement of operation and at least every three years after that?		N/A		N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
4.11	Have there been any changes to the OEMP and have these changes been communicated to Site Staff? Has DoPE been provided with a copy of any amended OEMP and is the updated version uploaded to the project website? For significant changes, has there been consultation with DoPE and OEH to determine if approval is required?		N/A	No changes. There has been a focus of Aboriginal Heritage that has been communicated through the site inductions and on the wall at the entrance to the site	N/A
Soil and Water Management Plan					
5.3 Soil and Water	Is an Environmental Incident Report being lodged and the issue investigated, if environmental impacts such as soil erosion, sediment run off or release of hazardous materials regardless of severity occurs? Are the records maintained according to the requirements of the EPL, part 4. M1 and M2.	Environment Officer	OFI	Monthly report for the 10 April observed, incident reported (excessive rain), CAR Raised, CAR observed, includes photographic records and a form. To conform with M1 and M2 of the EPL, it is suggested to add 2 additional line items on incident report form to include method of complaint and reason for no action taken (if applicable).	N/A
5.3 Soil and Water	Has there been access to undisturbed areas and if so, was a specific WMS which assesses the impacts of the work completed? Is the requirement to do this including in the site induction package?	BRWF Site Manager	Compliant		N/A

Independent Environmental Representative Audit



Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
5.3 Soil and Water	Are Monthly inspections being undertaken for damage to permanent and temporary erosion controls and are repairs being undertaken where necessary?	BRWF Site Manager	Compliant	Inspection report observed	N/A
5.3 Soil and Water	Are Monthly inspections being undertaken for the failure of grass to reseed as per the rehabilitations plans?	BRWF Site Manager	Compliant	Inspection report observed	N/A
5.3 Soil and Water	Are site inspections taking place after significant rainfall events? Is a log being maintained where cleanout is required to identify 'hotspots' for future inspections	BRWF Site Manager	Compliant	Inspection report observed	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
5.3 Soil and Water	Are checks to ensure erosion and sediment controls are achieving design function being undertaken six monthly for the first two years and every two years after that to ensure that controls are reducing water velocities and soil is not being transported.	BRWF Site Manager	OFI	Monthly Inspections and ER inspections. Site inspection undertaken during audit which included checks to ensure the controls are achieving the design function. Two opportunities for improvement: 1. improve the function of the sediment control system by placing rock checks on the northern side of the track north of 61 and rip rap over the sediment basin at the intersection of turbine 61. 2. Update this management strategy in OEMP (first line item page 30) to ensure an action is taken if design function is not working effectively e.g maintain and improve sediment controls where they are not achieving design function.	Yes
5.3 Soil and Water	Has there been any requirement for additional clearing? If so, was a WMS prepared which included installation of temporary erosion controls	BRWF Site Manager	N/A	N/A	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
5.3 Hazardous Material	Is a Hazardous Materials Register being maintained on site? Are MSDS's included? Is there a site map showing the location of hazardous materials and allowable storage quantities? Does the register show who is authorised to access and use the materials?	BRWF Site Manager	Compliant	Register observed. Safety data sheet register observed in the first aid room, on the fence at the entrance to the site compound.	Yes
5.3 Hazardous Material	Are all hazardous materials stored in Australian Standard storage containers and stored according to AS 1940-2004. All storage is to be in the designated locations, secure and only accessible by authorised personnel.	BRWF Site Manager	Compliant	Oil store observed. Only emptied drums stored outside.	Yes
5.3 Hazardous Material	Does the register include training records to ensure all personnel using the hazardous materials are appropriately trained?	BRWF Site Manager	Compliant	Training register observed	N/A
5.3 Hazardous Material	Are there work instructions for each hazardous material?	BRWF Site Manager	Compliant		N/A
5.3 Hazardous Material	Are all hazardous materials requiring disposal disposed of according to the regulatory requirements and requirements of the MSDS? Are records of disposals maintained when licenced contractors are used	BRWF Site Manager	Compliant	One disposal since operation started. Waste Chain of Custody form observed	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
5.3 Hazardous Material	Does the Emergency response plan include instructions on how to deal with a significant spill of hazardous materials? Are spill kits located in the designated locations and are they regularly checked.	BRWF Site Manager	Compliant	Spill kits in nominated towers and all vehicles. List of nominated towers provided by GE. Internal sumps within towers to capture oil. Any oil spill would be picked up through the triggering of a low oil alarm.	N/A
5.3 Hazardous Material	Is vehicle refuelling or maintenance on Site avoided where possible? Other than emergency situations, is a WMS created prior to vehicle refuelling or maintenance?	BRWF Site Manager	Compliant	No refuelling on site.	N/A
5.3 Hazardous Material	Are there procedures for refuelling of the substation backup generator and the telecommunication backup generator? Are refuelling records maintained?	BRWF Site Manager	Compliant	Filled by contractor under their WMS. Refuelling register (only relevant to generator) observed.	N/A
5.3 Hazardous Material	Are liquid paints being disposed of offsite?	BRWF Site Manager	N/A	N/A	N/A
5.3 Hazardous Material	Is there a procedure to manage the release and removal of oil from the main transformer?	BRWF Site Manager	N/A	very low risk and would be prepared when oil removal is required	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
5.3 Hazardous Material	Is there a procedure to manage the removal of solid waste from the sewerage system using a licensed contractor?	BRWF Site Manager	Compliant		N/A
5.4 Management controls	Are the controls listed in this section in place to manage issues soil and water issues		Compliant		N/A
5.5 Monitoring and Inspection	Do staff let BRWF manager know of any controls that are not working? Are these checked as part of the regular site activities		Compliant	Yes, GE staff are aware of things to look for.	N/A
5.5 Monitoring and Inspection	Are monthly inspections of erosions, sediment controls and contaminant systems undertaken by BRWF Site Manager or delegate? Are details recorded on a checklist? Do the inspections include oil separators in the substation?		Compliant	Yes, mostly undertaken after an event but also included on checklist	N/A
5.5 Monitoring and Inspection	Are Inspections by BRWF Site Manager or delegate following significant rainfall (>30mm/24 hours) undertaken to identify where sediment is travelling beyond the erosion and sediment traps. Where sediment is observed travelling >3m beyond roads/hardstands/lay down areas/cable routes are these reported and investigated as an environmental incident.		Compliant	Yes, rainfall incident forms observed along with action taken.	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
5.5 Monitoring and Inspection	Within 3 months after the first 24 months period of operation, an assessment of mitigations to DoPE		OFI	Delete this line - the site is subject to periodic auditing consistent within AS. Not sure of relevance	N/A
Flora and Fauna Management Plan					
6.3 General	For excavation in undisturbed areas, is a WMS completed? Is OEH consulted prior to works commencing?	BRWF Site Manager	N/A	No disturbance	N/A
6.3 General	Does the site induction reinforce that all native fauna (including snakes) are PROTECTED and that no person is to destroy, take, kill or unnecessarily disturb any plant, animal, bird or mammal?	All personnel	Compliant	Site induction package included	N/A
6.3 General	Are details of how to identify flora and fauna expected on Site, including which species are considered dangerous (typically snakes) provided as part of the Site Induction Package and on information boards on Site?	BRWF Site Manager	OFI	Details of significant species on site along with species considered dangerous. Change wording eg. 'Provide as part of the Site Induction Package and on information boards on site, details on significant flora and fauna expected on Site, along with species considered dangerous (eg. Snakes).	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
6.3 General	Does the site induction package provide information about interactions with fauna including warnings and instructions on how to deal with identified dangerous animals?	BRWF Site Manager	Compliant		N/A
6.3 General	Does the site induction package include information on the requirement to report sightings of vulnerable species (sighted live or dead) and is a register of sighting maintained?	All personnel	Compliant	Incident/Accident/Find - reported as a find on the incident sheet	N/A
6.3 General	Are only trained and qualified persons responsible for handling or relocating snakes?	All personnel	Compliant	Wires/Laoka contacted to remove snakes	N/A
6.3 General	Does the site induction package include the requirement to report to the BRWF Site Manager if sick or injured native animals are identified? IF this has happened, was the Local wild life recovery contacted.	All personnel	Compliant	Has not happened	N/A
6.3 General	Are observation of weeds being reported to the BRWF Site Manager? Is there a weeds register?	All personnel	OFI	Change wording to say any observation of target or priority weeds species. Agronomist on site to determine level of weeds. A weed spray program is being developed.	N/A
6.3 General	Are weeds being managed in accordance with the Weed Management Plan?	BRWF Site Manager	see below		N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
6.3 General	If sick or injured livestock are identified, is the BRWF Manager notified and the relevant landowner contacted?	All personnel	N/A	Recorded as a find. No reportings recorded	N/A
Reptile Management Plan					
6.3 Reptile Management Plan	Is there no disturbance to ground between 1st November to 31st January unless there is written approval from DoPE	Site supervisors	N/A	Excavation works generally only required when a cable needs to be replaced. Discussion undertaken on procedure if disturbance was required. Bring specialist in to assess whether the area to be disturbed supports reptile species. Prepare a WHS.	N/A
6.3 Reptile Management Plan	If excavations or clearing is to take place, has the site been assessed by an appropriately qualified and experienced ecologist with specialist knowledge of GED. Where assessments are undertaken by the ecologist, do they occur prior to excavation commencing; up to three weeks before disturbance is to occur prior to November; and up to three days before disturbance is to occur between November and May.	Environment Officer	N/A	No excavations or clearing occurred	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
6.3 Reptile Management Plan	Does the scope of the ecologists inspections include searches of all tussocks and searches of ground surface greater than 100mm by 100mm (rocks should be left upside down or preferably removed from the Site to discourage any continued use by reptiles); Searches of arthropod holes using endoscope (between May and end of October only). If any GEDs, SLLs or LWSs are found, do relocation activities (as detailed in Reptile Relocation below) take place	Environment Officer	N/A		N/A
6.3 Reptile Management Plan	Where the ecologist undertakes an inspection, is a record of the inspection maintained including date that excavation works were undertaken. Where a reptile is found, are data sheets supplied by OEH used for data collection.	Environment Officer	N/A		N/A
6.3 Reptile Management Plan	Are excavation activities undertaken in accordance to the outlined procedure	Job supervisor	N/A		N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
6.3 Reptile Management Plan	Have any GED, SLL, LWS been found and if so, was the reptile relocation procedure followed? Is the additional procedure for GED also being followed?	All site staff	OoC	None found. GED relocation procedure. OM to ensure that the appropriate licence is held by the U of C prior to picking up the species. There is a lack of information regarding release sites. Update OEMP to include location.	N/A
Weed Management Plan					
6.3 Weed Management Plan	Are Weed id charts provided on Site Information Boards and information included in the Site Induction Package? Is the information reviewed annually using information and bulletins issued from local councils, land services and State and Commonwealth departments. Are specialists and weed spraying contractors also consulted.	BRWF Site Manager	Compliant	Observed	N/A
6.3 Weed Management Plan	Is an annual training session provided to all Site Staff regarding weed identification?	BRWF Site Manager	N/A	Noted. Annual timeframe not yet relevant. Proposed to do on team brief	N/A
6.3 Weed Management	Are monthly inspections undertaken to determine weed infestation levels. If infestations are recorded, is there prompt implementation of weed spraying by local weed spraying contractors.	BRWF Site Manager	Compliant		N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
6.3 Weed Management Plan	Does maintenance spraying occur annually as advised by weed spraying contractor in areas known to have high concentrations of weeds	BRWF Site Manager	Compliant	daily log for contractor observed	N/A
6.3 Weed Management Plan	Are materials imported from quarries south of Cooma only and certified as weed free.	Job Supervisor	N/A	No imported materials	N/A
6.3 Weed Management Plan	Are site vehicles regularly inspected for cleanliness and potential seed material? Are any vehicles identified with weed seed to be removed immediately from Site and cleaned	BRWF Site Manager	Compliant		N/A
Birds and Bats Management Plan (also refer BBAMP for further management strategies)					
6.3 Birds and Bats	Is the observation of carcasses part of regular Site Inspections? Are any dead or injured birds or bats reported as per the procedure and timeframe outlined in the BBAMP	BRWF Site Manager	Compliant	2 records. Photos observed	N/A
6.3 Birds and Bats	Is there a register to record observations and sightings? Are Site Staff provided with identification information as part of the Site Induction Package and on Site information boards	BRWF Site Manager	Compliant	Register and incident report forms observed	N/A
6.3 Birds and Bats	Are Bird and Bat Surveys and reviews required under the Bird and Bat Adaptive Management Plan (Appendix H) as part of Condition 3.3 of State CoA being undertaken?	Environment Officer	Compliant		N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
6.4 Management t controls	Are the controls listed in this section in place to manage flora and fauna issues		Compliant		N/A
6.5 Monitoring and Inspection	Is there a monthly inspections of road sides, hardstands and culverts for weed infestations and carcasses		Compliant		N/A
6.5 Monitoring and Inspection	Is there a monthly inspections of vehicles for weed seed		OFI	More adhoc, more opportunistic. Update OEMP to say routine inspections rather than monthly	N/A
6.5 Monitoring and Inspection	is there an annual audit of weed condition on site		Compliant	Agronomist visit. Email sighted from 19 August 2015 from Chris Hillman Landmark	N/A
6.5 Monitoring and Inspection	Is bird and bat monitoring undertaken in accordance with the Bird and Bat Adaptive Management Plan		Compliant	refer project approval	N/A
Landscape and Rehabilitation Management Plan					
7.30	Are assessment reports being undertaken of the rehabilitation outcomes and reported to landholders, and the respective NSW and Commonwealth Government agencies? Is performance monitored through the use of plots (quadrants and transects), and photo reference points and undertaken by an independent and suitably qualified landscape	EPC Contractor for first 2 years, then Environment Officer	Compliant	Chris Hillman to be engaged and is required to be approved by DoPE. This process is being undertaken currently	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	ecologist (whose appointment has been agreed to by DoPE). Is monitoring continuing until the landscape ecologist has verified that rehabilitated areas are well established, in good health and self-sustaining.				
7.30	Is maintenance of rehabilitated areas occurring to ensure the effectiveness of the rehabilitation? Maintenance is to occur until an independent and suitably qualified expert as being well established, in good health and self-sustaining.	EPC Contractor for first 2 years, then Environment Officer	OoC	Success varies across the site. Some areas e.g Brechnoch Road entrance is effectively revegetated. Neighbouring properties require further rehabilitation. May be opportunity to request landholders remove or reduce stock levels while rehab takes place	Yes
7.30	Is maintenance of screening vegetation planted as recommended in the Visual Impact Verification Report (Condition 2.23 of the CoA). Are unsuccessful plantings being replaced by the Proponent at no cost to the landowner?	Environment Officer	Ongoing	Report prepared and submitted to DoPE 2 weeks ago. Observed 'Rosemount Landscape Mitigation Plan. Prepared by Green Bean Design. 3 properties require screening. Seeking tenders to complete the landscaping works	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
7.30	Has a program been implemented to reseed poorly performing areas with appropriate seed mixes, within a season or time frame appropriate to the seeding being used, taking into account any lessons learnt from the failure of the previous rehabilitation	EPC Contractor for first 2 years, then Environment Officer	Compliant	Downer have been requested to begin remedial works on the areas that didn't sustain or perform over winter. See comment above re varied successes of vegetation	N/A
7.30	Are rehabilitated areas monitored following a significant rainfall event and if damaged, reinstated with topsoil and resown	BRWF Site Manager	N/A	Monitoring but haven't had to re-topsoil. No damaged sites.	N/A
7.30	Are watering regimes, as determined by the EPC Contractors Site specific rehabilitation management plan, being maintained.	BRWF Site Manager	N/A	None required due to wet summer	N/A
7.30	If additional rehabilitation is required, is there consultation with the relevant landholders undertaken to determine establishment types and techniques. May include direct seed drilling and seed spreading. Where direct drill is used, is a tractor drawn narrow tyne seeder being used as the preferred method?	BRWF Site Manager	N/A	No additional rehab required	N/A
7.30	Where native seeds are used, do alternate methods of spreading include mulch wheel spreader, native grass mulch, rice straw mulch, air seeding and hand casting.	Environment Officer	N/A	Native seeds used on Lochlea during construction. Reseeding of natives not required as yet.	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	Does a seeding contractor determine the quantities and density of seeds spread or planted	Environment Officer	N/A	No additional rehab required. Would be undertaken by agronomist	N/A
7.30	When further seeding is required, is the soil prepared as per the procedure outlined in the OEMP i.e cultivation to alleviate compaction issues, weed spraying. Does sowing take place where there is adequate moisture and is a starter fertiliser used in areas with non - native seedlings?	Environment Officer	N/A		N/A
7.30	Has hydro mulching taken place and is it undertaken in accordance with the procedure outlined in the OEMP.	Environment Officer	N/A		N/A
7.30	Has there been planting of tubestock and cells? Has the planting included using a wet mix of water crystals and slow release fertiliser?	Environment Officer	N/A		N/A
7.30	Are plants selected suited to the classified vegetative community as per the species schedule? Are they sun and frost hardened? Are they healthy, disease free specimens with strong root	Environment Officer	N/A		N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	systems? If any have signs of pests, diseases or weed infestation, are they rejected?				
7.30	Are plants used for rehabilitation of the Lochlea offset site natives, as outlined in the Biobanking Management Plan?	Environment Officer	Compliant		N/A
7.30	Is planting undertaken at the appropriate time of year, in the right conditions. Has a landscaper assisted in determining plant spacing and grouping of species?	BRWF Site Manager	Compliant	Spring planting being planned. Biobanking planting completed and assessed by OEH	N/A
7.30	Are protective measures around new plantings employed to prevent loss through grazing where necessary?	BRWF Site Manager	N/A	No planting, only seeding	N/A
7.30	Are the plants watered? Is the water used for watering potable and free of toxins and pollutants?	BRWF Site Manager	N/A		N/A
7.4 Management Controls	Are the controls listed in this section in place to manage rehabilitation issues		Compliant		N/A
7.5 Monitoring and Inspection	Are monthly inspections occurring to determine: 1. Status of growth of grasses in rehabilitated areas and any failures of rehabilitation measures		N/A	Being planned	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
7.5 Monitoring and Inspection	Is an annual report produced to verify rehabilitation outcomes		N/A	Being planned	N/A
7.5 Monitoring and Inspection	2 years after completion, has an external validation of rehabilitation outcomes taken place?		N/A	Being planned	N/A
Cultural Heritage Management Plan					
8.30	Does the site induction provide staff with a general awareness of cultural heritage management issues, including awareness of Locales 5 and 8 of SU13 and Local 2 of SU 19 and there requirement to maintain observation for potential fines while executing works	BRWF Site Manager	Compliant	Induction package observed and information on site boards	Yes
8.30	Is the Unexpected Finds Procedure readily available on site and included in the Site induction Package? Has there been any unexpected finds (Aboriginal or Heritage) and, if so, has the relevant procedure (as per the OEMP) been followed.	BRWF Site Manager	Compliant	Induction package observed. Find would be recorded as a 'find' on the incident register	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
8.30	Have operational activities, including road and underground cable maintenance, in previously undisturbed areas within 100m of Locales 5 and 8 of SU 13 and Locale 2 of SU 19 (see Appendix I) been avoided where possible. If work is required in these areas, has a WMS been completed and was OEH consulted prior to work commencing.	BRWF Site Manager	Compliant	Yes, No work required	N/A
8.4 Management Controls	Are the controls listed in this section in place to manage cultural heritage issues:		Compliant		N/A
8.5 Monitoring and Inspection	Are excavations being checked for unexpected finds		N/A		N/A
8.5 Monitoring and Inspection	Are external audits being undertaken, as required, to verify that checks are taking place		N/A		N/A
Air Quality Management Plan					
9.30	Do all drivers of vehicles slow down past designated residences to and on Site to reduce dust. Is this requirement reinforced during the Site Inductions plus information boards on Site.	Operations Manager	N/A	No designated residences during operation. Signage installed at one property owner.	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
9.30	Does watering take place around areas of residences where levels are extreme due to high winds, when performing maintenance?	BRWF Site Manager	N/A	No extreme levels of dust generated	N/A
9.30	Are vehicles maintained to ensure that vehicle emissions are maintained at reasonable levels. Are vehicles exhibiting excessive emissions removed from site?	BRWF Site Manager	Compliant	Encourage staff to drive to the conditions	N/A
9.30	Are roads maintained on site to remove loose materials when required?	BRWF Site Manager	Compliant		N/A
8.4 Management Controls	Is a complaints register maintained to record details of dust complaints from landowners and general public		Compliant	No dust complaints	N/A
9.5 Monitoring and Inspection	Are road conditions monitored monthly?		Compliant	Monthly inspection sheet	N/A
9.5 Monitoring and Inspection	Is there an assessment of dust control as part of inspections and normal activities as required?		Compliant	As required. Dust has not been an issue during operational stages	N/A
Traffic Management Plan					

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
10.30	Is a delivery information pack maintained to provide information on suitable routes and warnings to delivery companies?	BRWF Site Manager	Compliant	Delivery map given to them. One heavy vehicle delivery for the generator which was coordinated through GE. Other deliveries in light vehicles only. Heavy vehicles require TMP as part of their requirements for RTA	N/A
10.30	Does the site induction package include 1. Requirements to maintain speed restrictions, 2. general information on school bus routes and times, general information on any major stock movements	BRWF Site Manager	Compliant	No school buses impacted, included in site induction.	N/A
10.30	Is a specific traffic management plan established for transport associated with major repair? Has this been communicated with to all stakeholders	BRWF Site Manager	N/A		N/A
10.4 Management Controls	Are the controls listed in this section in place to manage traffic issues:		Compliant		N/A
10.5 Monitoring and Inspection	Is the complaint records audited as part of management review		Compliant	Management review not yet undertaken	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
Community Information Plan					
11.30	Are major repair activities communicated to the immediate local community prior to the activities occurring? Methods may involve letters or emails	Communications Officer	N/A	No major repairs	N/A
11.30	Does the website include information on typical wind farm activities to assist in providing information about wind farming to the broader community and local residents	Communications Officer	Compliant		N/A
11.30	Is relevant information about wind farm operations (significant project activities and events) provided to Stakeholders on a regular basis? Either through updates on the website, newsletters and media releases	Communications Officer	Compliant	Newsletter to landowners several weeks ago to update the operations of the windfarm	N/A
11.30	Is there provision of a 24/7 hotline with a phone number available on the website, email address for submission of complaints and signage with contact details at all entrances to Site. Project website with email, postal and phone contact details and annual advertisements with details of Complaints hotline	Communications Officer	Compliant	Signage observed. Information on website	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
11.30	Is there a complaints register which is being maintained for the life of the Project? Does it include all complaints received via phone, email, verbally and through the Consultative Community Committee meeting or by person? Does the complaint record include detail of any action taken and evidence of both	Communications Officer	Compliant	See above. Member of CCC has reduced frequency of meetings to 6 monthly meetings or as required. Minutes observed. There has been blank complaints (no name or nature of complaint) that have not been recorded on the register.	N/A
11.30	Have residents who have been assessed to have a moderate to high level of visual impact been consulted in person for preparation of the Visual Impact Verification Report to be completed within 6 months of commissioning of the Project. This is in accordance with Condition 2.23 of the State CoA.	Operations Manager	Compliant	Visual Impact Verification report observed. Those non associated properties deemed to have high impact were addressed. 5 non-involved land holders wanted follow up and 2 requested screening.	N/A
11.30	Are landowners who have noise monitoring performed at their residence consulted in person in accordance with condition 3.1 of the State CoA	Operations Manager	ongoing	Sighted letter re Noise study dated 27 July 2015. Monitoring for non-involved landowner at Coopers Hill undertaken	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
11.30	Does the CCC meet 3 monthly during the first two years of operation to provide a forum for open discussion between the BRWF operator and community representatives. Are details of the committee membership published?	Operations Manager	Compliant	Yes, last meeting decided that the meetings would be pushed out 6 monthly during operations (May and November) with the chair able to call an extra ordinary meeting as required. Little to discuss and little attendance. Minutes of the meeting February 2017 observed, which stated next meeting to be six monthly.	N/A
11.30	Is there representation of the BRWF on the Cooma Monaro Shire Council and Bombala Shire Council community fund committees?	Operations Manager	Compliant	Site Manager	N/A
11.30	Are the result of audits being communicated to the community including publishing consultant reports on noise, TV reception, bird and bat studies, compliance and environmental audits to public web site? Are local residences, landowners and CCC being notified of outcomes.	Communications Officer	Compliant	TV reception report viewed on website. Audit not completed yet, Bird and Bat Adaptive Management Plan has been put on the website. Project approval requires a report be submitted to the DG on an annual basis for the first five years. Reference to other reports as coming. Clarification on 'bird and bat studies' is required. Intent is to submit summary results on the B and B for public viewing on completion of the bird and bat studies	N/A

Independent Environmental Representative Audit



Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
11.30	Are copies of all management plans and updates published on the website	Communications Officer	Compliant		N/A
11.30	Are links to approvals and updated approvals published on the website	Communications Officer	Compliant	Observed	N/A
11.4 Management Controls	Are the controls listed in this section in place to manage community issues:		Compliant		N/A
10.5 Monitoring and Inspection	Are complaints reviewed as required as part of management review		N/A	No management review	N/A
10.5 Monitoring and Inspection	Is there a record of complaints for the month recorded in management reports?		N/A		N/A
Emergency Response Plan					
12.3 General	Has there been an emergency where an emergency response plans has required to be initiated? Was the relevant service notified?	BRWF Site Manager or nominated person in their absence	Compliant	No emergency	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
12.3 General	Are site maps provided to all personnel with location identifiers marked and GPS co-ordinates in AMG and lat/long listed on the back of the map. Are maps located in all vehicles and Service Compound, and has a copy of the Site map been provided to relevant emergency services.	BRWF Site Manager	Safety - not audited		
12.3 General	Do the emergency plans include details of all personnel required to be notified. At a minimum, do they include the WTG Maintenance Site Manager, BRWF Site Manager, Environment Officer and BRWF Manager?	Operations Manager	Safety - not audited		
12.3 General	Are designated mustering points established and shown on Site plans.	BRWF Site Manager	Safety - not audited		
12.3 General	In the event of an emergency, are all staff aware of the requirement to contact the BRWF Site Manager to register their departure if they are leaving from a non-approved evacuation route	Wardens and personnel	Safety - not audited		
12.3 General	Is the following equipment available at all times at the Emergency Control Centre: Site sign-on log, a copy of the Emergency	BRWF Site Manager	Safety - not audited		

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	Response Manual, notebooks and pens, telephone conversation log, camera, video camera and/or mobile phone.				
12.3 General	During fire season, is the fire rating displayed in a prominent location in the Site Office	BRWF Site Manager	Safety - not audited		
12.3 General	Has there been an inspection of fire preparedness by Cooma Rural Fire Service command. This is to occur two months into operation and annually. Are site information maps provided and updated annually with co-ordinates of WTG and substation and Service Compound. Has a 24/7 contact number been provides for use by emergency services	BRWF Site Manager	Safety - not audited		
12.3 General	Do the site Inductions include an overview of emergency plans and emergency response procedures? Is information on emergency plans maintained on information board? Is more extensive training for personnel nominated as Site Wardens?	BRWF Site Manager	Safety - not audited		
12.3 General	Are visitors to site (untrained persons) accompanied by fully inducted personnel when not in the vicinity of the Service Compound.	All personnel	Safety - not audited		

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
12.3 General	Are emergency response contact details maintained in the Emergence Response Manual, Site Induction Package, information boards, next to each phone and in vehicles? Are they updated annually or as identified?	BRWF Site Manager	Safety - not audited		
12.3 Fire prevention	Are dry powder fire extinguishers available around the substation, Service Compound and wind turbines? Are they checked annually and tags stamped.	BRWF Site Manager	Safety - not audited		
12.3 Fire prevention	Is a fire fighting water cart maintained at the Service Compound and checked monthly during fire season for water and a test pump run. Are nominated personnel trained in its use? Is a record of training maintained?	BRWF Site Manager	Compliant	Located in the compound	N/A
12.3 Fire prevention	Has there been a fire on site? Was the appropriate procedure followed (refer Fire first response)	All personnel	N/A	No fires	
12.3 Fire prevention	Are processes in place to ensure reduction of fuels? Ensure no build-up of combustible materials around the Substation and service compound. Manage vegetation in the immediate vicinity of all assets either through grazing or mowing	BRWF Site Manager	Safety - not audited		

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
12.3 Fire prevention	Are tools serviced as per manufacturer's recommendations? Do tools used in open areas (outside of substation, Service Compound) have a test tag showing inspection within the last 12 months.	BRWF Site Manager	Safety - not audited		
12.3 Fire prevention	After a lightning storm, when safe to do so, are site inspections carried out looking for ignition hotspots or potentials strikes on equipment.	BRWF Site Manager	N/A	No lightning strikes on site	
12.3 Fire prevention	Are staff aware of the smoking policy and is it adhered to?	BRWF Site Manager and all personnel	Compliant	Designated smoking spot in the site compound.	
12.3 Fire prevention	Are only diesel vehicles used when operating off the Site roads (are permits gained to operate in these areas and do they state that diesel only can be used). Does the site Induction include comment on not parking in long grasses? Are vehicles regularly maintained?	BRWF Site Manager	N/A	No movements off designated roads	
12.3 Bush fires	Was there a Bushfire Contingency Plan? Is it summarised as part of the site induction, made available on the information board and are copies included in site vehicles	BRWF Manager	Safety - not audited		

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
12.3 Bush fires	Are WMS obtained for all works conducted outside of the workshop that may result in the ignition of a fire, i.e grinding, cutting, arc welding, gas welding or any activity that produces a spark or a flame? Are WMS only issued at times when there is not a total fire ban, the danger is below very high and without high wind. Is the WMS issued by appropriately trained and authorised personnel? Is a register of authorised personnel maintained	BRWF Site Manager	Compliant		
12.4 Management Controls	Are the controls listed in this section in place to manage emergency response issues:		Safety - not audited		
12.5 Monitoring and Inspection	Are all work areas monitored (ad hoc) for appropriate fire extinguishers, tagged electrical equipment, correctly stored combustibles, build-up of combustible materials and is the BRWF Site Manager notified if there are any concerns. Noted in Operations Manager Daily Site Log.		Safety - not audited		
12.5 Monitoring and Inspection	Are emergency and fire preparedness plans reviewed, as required, as part of the of management review.		Safety - not audited		

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
12.5 Monitoring and Inspection	Is there annual liaison, inspection and fire prevention inspections by the Cooma rural fire service? Are any recommendations implemented?		Safety - not audited		
Noise and Vibration Management Plan					
13.11 General	Is there a general prohibition against night time or after hour deliveries, except in emergencies?	Operations Manager	Compliant	No deliveries after hours	N/A
13.11 General	Is heavy plant used during standard working hours?	BRWF Site Manager	Compliant	Yes	N/A
13.11 General	Are tools used during working hours or with noise suppression measures put in place? Is a WMS issued to use tools out of hours?	BRWF Site Manager	N/A	No noisy tools on site. Only relevant for the major repairs	N/A
13.11 General	For disassembly and assembly of wind turbines, if operated outside of standard operating hours is a noise assessment undertaken, are residences within 2 km of the work consulted and is noise monitoring undertaken if requested.	BRWF Site Manager	N/A		N/A
13.11 WTG Noise	Has an Independent report of noise compliance assessment been provided to	Environment Officer	Compliant	Undertaken	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	DoPE and the EPA within 12 months of commissioning				
13.11 WTG Noise	In the event of the noise criteria for operational wind turbine being exceeded, Is the WTG Operation Noise Mitigation Strategy being implemented (refer Page 69)	Operations Manager	Compliant	Initial draft report states full compliance to the noise standards	N/A
13.12 Management Controls	Are the controls listed in this section in place to manage noise and vibration issues:		Compliant		N/A
13.13 Monitoring and Inspection	Has noise monitoring for compliance been undertaken within 12 months of commissioning of Stage One		Compliant	Being undertaken currently	N/A
Waste Management Plan					
14.3 General	Is all waste generated at wind turbines or other work areas picked up and brought back to the Service Compound by the responsible personnel?	All personnel	Compliant		N/A
14.3 General	Is waste management discussed in the site induction? Does it include the requirement that no waste can be collected from off site and disposed of or stored on site.	BRWF Site Manager	Compliant	Induction package observed	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
14.3 General	Are Regular Site Inspections undertaken to ensure that overall Site cleanliness is maintained.	BRWF Site Manager	Compliant	Monthly inspections sheet. Visual inspections demonstrate clean site	N/A
14.3 General	Are general waste containers and recycling containers located throughout the workshop and service building? Are these receptacles and recycling emptied into the main waste containers as required?	BRWF Site Manager	Compliant	Observed	N/A
14.3 General	Are all vehicles and skips covered when transporting waste	BRWF Site Manager	Compliant	Cleaning contractor removes putrescible. Recycling removed by other contractor	N/A
14.3 General	Are cigarette butt disposal containers provided in the designated zone and for vehicles requiring them? Are they then deposited in the general waste containers?	All personnel	Compliant	No smoking except for designated site compound	N/A
14.3 General	Is there no incineration of waste? Is this included in the site induction package	BRWF Site Manager	Compliant		N/A
14.3 General	Is green waste removed from Site to a licensed green waste disposal? The exception is where trees and logs can be placed to provide suitable habitat, to be done in consultation with an ecologist	BRWF Site Manager/Environment Officer	Compliant	No green waste	N/A

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
14.3 General	Are the following recycling skips maintained in the Service Compound and emptied when full: Metal, recyclables, paper and cardboard. Is there signage to let staff know what is allowed in there and is information on recycling included in the site induction package	BRWF Site Manager	Compliant	No requirement for metal skips. Visual observed	N/A
14.3 General	Is organic waste collected in separate containers and removed from site regularly to prevent vermin. It can be disposed of to staff members compost bins or local landowner's compost bins on arrangement with persons.	BRWF Site Manager	Compliant	Cleaning contractor weekly	N/A
14.3 General	Is excess soil, that cannot be redistributed on site, removed to Cooma Landfill site	BRWF Site Manager	Compliant	Only soil removed from silt fences redistributed on site	N/A
14.4 Management Controls	Are the controls listed in this section in place to manage waste issues:		Compliant		N/A
14.5 Monitoring and Inspection	Is there a monthly inspection of general housekeeping and segregation of waste		Compliant	Weekly	N/A
14.5 Monitoring and Inspection	Are there as required checks of MSDS, hazardous waste registers and disposal records		Compliant	Updated ad hoc as required	N/A
Electronic Interference Plan					

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
15.4 General	Has there been a requirement to rectify television reception and if so, has the appropriate procedure (p 78) been followed?	Environment Officer	N/A	No requirement identified in TV reception report Nov 2014	N/A
15.4 General	Has there been any disruptions to radio communication service links and if so, has the appropriate remedial measures been undertaken within 3 months of the problem being rectified	Environment Officer	N/A	No	N/A
15.5 Mgmt Controls	Are the controls listed in this section in place to manage electromagnetic interference issues:		Compliant		N/A
15.5 Monitoring and Inspection	Does the complaints register record details of noise complaints from landowners and general public		N/A	No complaints	N/A

APPENDIX B NSW APPROVAL CONDITIONS DETAILS OF AUDIT FINDINGS

B.1 OPERATIONAL NOISE

Condition 2.17 requires that the project is designed to operate so that the equivalent noise level (LAeq (10-minute)) from the wind turbine component of the project does not exceed the following limits at any existing sensitive receptor:

- a) 35dB(A); or
- b) the existing background noise level (LA90 (10-minute)) correlated to the integer wind speed at the turbine hub height at the wind farm site by more than 5 dB(A), whichever is the greater, for each integer wind speed (measured at hub height) from cut-in to rated power of the wind turbine generator.

Condition 2.18 negates the requirement to meet these noise limits if there is a noise agreement in place between Boco Rock Wind Farm and the relevant landowner. **At the time of the audit** no noise agreements could be found on the internal management system (Wiki) ~~during the audit and it was considered that none were in place.~~ **Advice was received from Brett Jones (CWP Renewables Pty Ltd on the 9 September 2015. This identified that a noise agreement with landholders exists. The lease agreements with landholders includes the following clause;**

7.7 (b) The Landlord acknowledges and agrees that it is adequately compensated by the amounts specified in clause 5 (including the Rent) for any noise or inconvenience caused as a result of the Permitted Use of the Site (without contravention of the Grantee's obligations under this clause 7 and without contravention of any condition of any Approval related to noise levels) and that it will not seek any further compensation from the Tenant in relation to such matters.

In relation to this clause, all landholders received letters that explained the potential noise from operation of the turbines, including predicted noise levels. The A-noise assessment, commissioned by GE, ~~was has been~~ undertaken by SONUS. The draft report (dated June 2015) stated full compliance to the noise standards. The report demonstrated that operational noise of 45dBA was achieved (with the highest being 42 DBA). **This is consistent with correspondence sent to land holders. As such this item is no longer considered an Observation of Concern.**

~~A second compliance noise report has been commissioned to investigate some additional issues, such as existing background noise levels, substation noise, and noise levels at some identified non-involved landholders, to ensure all Conditions of the Approval relating to operational noise are being met. It was unclear at the time of the audit, whether the noise assessments being undertaken by SONUS covered all landowners, including those involved landowners without a noise agreement. **Observation of Concern 1.** BRWF Manager is to confirm scope of noise assessment report is appropriate for compliance requirements.~~

B.2 COMPLIANCE TRACKING PROGRAM

Condition 4.1 (f) requires that the compliance tracking program includes *provisions for reporting environmental incidents to the Director-General during construction and operation*. The OEMP or the Compliance Register does not include provisions for reporting environmental incidents to the Director-General. **Observation of Concern 2.** The OEMP should be updated to ensure there is a process for reporting

Audit Report Number: 1

environmental incidents to the Director-General. It should also include a definition of 'environmental incident' so that it is clear when it is necessary to report to the Director-General in addition to the routine internal incident reporting. The definition for a 'pollution incident' is included in the dictionary of the *Protection of the Environment Operations Act 1997*. This can be included in the OEMP but the broader definition needs to capture all environmental incidents.

The Emergency Response Plan details the process for reporting incidents (including environmental) and includes a flow chart to provide a visual description of the process. This includes notification to the Environment Protection Authority but not the Director-General. This plan should be updated to include notification to the Director-General also. In addition, it was noted that the hard copy ERP that is on display and available to all staff was not the most current version. An updated plan should be printed and the superseded version removed.

B.3 AUDIT PROTOCOL

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
DOP APPROVAL CONDITIONS					
Administrative					
1.1	Is the project being carried out generally in accordance with a. Major Projects Application 09_0103 b. Boco Rock Wind Farm Environmental Assessment c. Boco Rock Wind Farm Preferred Project Report and Response to Submissions d. the conditions of this approval?	Project Owner, 3rd party, GE	Compliant	Current auditing conditions of approval	N/A
Flora and Fauna					
2.1	Has a biodiversity offset package been prepared and secured to the satisfaction of the Director General. Must comprise a minimum of 750 hectares of NTG, at least 150 hectares confirmed habitat for the GED and SLL and at least 300 hectares of confirmed habitat for the LWS	Project Owner	Compliant	Signed off as part of the construction audit 2 (May 2014)	N/A
2.7	Has there been disturbance to watercourses or riparian vegetation. Has it been rehabilitated within 6 months of cessation of an activity at the relevant area?	3rd party	Compliant.	Rock work was undertaken within the creek. ER has deemed rehabilitation to be adequate. A draft letter has been prepared and has been submitted to NOW. Letter observed	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
2.8	Is rehabilitation being undertaken progressively and within 6 months of cessation of an activity at the relevant area?	3rd party	Compliant	Ongoing, advice has been sought from Chris Hillman. Approval from DoPE is being sought for chosen contractor.	N/A
Noise and Vibration					
2.17	Has the project been designed and does it operate to ensure that the equivalent noise level (LAeq (10-minute)) from the wind turbine component of the project does not exceed the following limits at any existing sensitive receptor: a) 35dB(A); or b) the existing background noise level (LA90 (10-minute)) correlated to the integer wind speed at the turbine hub height at the wind farm site by more than 5 dB(A), whichever is the greater, for each integer wind speed (measured at hub height) from cut-in to rated power of the wind turbine generator.	GE	OoC	Condition is relevant to landowners without a noise agreement (refer 2.18) Draft Noise Compliance Post Construction noise monitoring report viewed. Prepared by SONUS June 2015. Demonstrated that operational noise of 45dBA was achieved (highest was 42 DBA). GE are responsible for meeting this condition. Second report (compliance noise report) has been commissioned to cover off some additional issues to	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
				ensure complete compliance. 2nd Draft report requested when available. Additional information provided 9/9/2015 identified that noise agreements exist.	
2.18	Are there any noise agreements in place with landowner? If so, do they satisfy the requirements of Guidelines for Community Noise (WHO, 1999) and Section 2.3 of Wind Farms: Environmental Noise Guidelines (South Australian Environmental Protection Agency, 2003).	Project Owner		No Noise agreements available at time of audit. CWP Renewables to follow up and see if SONUS are including all involved landholders. Additional information provided on the 9/9/2015 demonstrating that noise agreements exist.	N/A
2.19	Detailed designed noise report (wind turbines) submitted for the Director- General's approval at least 6 months prior to the commencement with commissioning		Compliant	Sent on the 24 March 2014. Commissioning approximately September 2014	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
2.20	Has the collector substation been designed and does it operate to ensure that the noise contributions from these components to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 3, at the nearest existing sensitive receptor to the substation. (unless negotiated agreements between Proponent and the relevant sensitive receptor are in place as per 2.21)	Project Owner, Third party	In hand	Follow up noise compliance report to investigate this issue.	N/A
2.22	Have overhead transmission line/s associated with the project been designed, constructed and do they operate to minimise the generation of corona and aeolian noise as far as reasonable and feasible at nearest existing sensitive receptors.	3rd party	Compliant	Signed off as part of the construction audit 2 (May 2014)	N/A
Visual					
2.23	Within six months of the commissioning of the project, was a Visual Impact Verification Report prepared and submitted to the Direct-General for approval? Requirements of the report are outlined in this condition	3rd party	Compliant	Observed report	N/A
2.24	Are the wind turbine generators free of advertising signs and logos (except where required for safety purposes). A corporate logo is acceptable provided it is not distinguishable by the naked eye from any publicly accessible location or from any non-associated receptors	GE	Compliant	Observed. Small name plate on the door to the turbine only	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
2.25	Does shadow flicker arising from the operation of the project not exceed 30 hours/annum at any non-associated receptor	Project Owner	Compliant	Refer to EA, compliance has been achieved	N/A
2.26	Does the substation have minimal visual intrusion to nearest sensitive receptors as far as reasonable and feasible?		Compliant	Not visible to any receptor - involved or non involved	N/A
2.27	Has external night lighting been restricted to that which was approved by NSW DoP in the letter dated 16/4. If aviation hazard lighting has been installed, has it been implemented in a manner that minimises visual intrusion to surrounding non-associated receptors as far as reasonable and feasible. Was any night light intrusions included in the Visual Impact Verification Report?	Project Owner	Compliant	No night lighting at substation or wind turbines. Emergency lighting only	N/A
Traffic and transport					
2.29	Was a pre-operational dilapidation survey report prepared prior to the commencement of operation, to assess the condition of all public roads traversed by construction traffic associated with the project in consultation with Council and RTA. Were roads identified to be repaired and has this been undertaken?		Compliant	Completed, submitted and signed off by Bombala and Cooma-Monaro Shire Councils. Letters from both Councils observed giving final approval of works	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
Hazards and Risks					
2.32	Are bushfire risks being minimised in accordance with the relevant RFS design guidelines (Planning for Bushfire Protection 2006 and Standards for Asset Protection Undated)? Are fire-fighting equipment and water supplies on site to respond to a bush fire?	Project Owner, 3rd party and GE	Compliant	Hard stands, APZ, hot work procedures, staying on roads, fire tanker on site. Emergency response procedure addresses bushfire. There is regular engagement with the RFS, attendance at their general meetings, and attendance at Local Environment meetings. RFS will there will be undertaking site inspection on the 20th October. Their padlocks will be added to the gates.	N/A
2.33	Is the RFS being regularly consulted to ensure familiarity with the project and the final location of all infrastructure on the site. Have all requests of the local RFS to reduce the risk of bushfire and enable fast access in emergencies been complied with.	Project Owner	Compliant	See 2.32	N/A
2.34	Has the following information been provided to the Civil Aviation Safety Authority, Air Services Australia, the Aerial Agricultural Association of Australia and any known privately owned local airfields) 'as constructed' coordinates	3rd party	Compliant	Observed	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	in latitude and longitude of each wind turbine generator; b). final height of each wind turbine generator and c). elevation at the base of each wind turbine generator				
2.35	Has the project contributed to any increases in costs of aerial agricultural spraying on any non-associated property surrounding the site? Has the affected landowner been fully funded for the cost difference?		N/A	No aerial spraying	N/A
2.36	Are dangerous goods and combustible liquids being appropriately managed in relation to storage, bunding, spill management etc	3rd party	Compliant	Observed container at the site compound. On receipt of chemicals, MSDS is consulted to ensure appropriate storage	Yes
2.37	Has an assessment of the existing quality of the television/radio transmission available at a representative sample of receptors located within 5 kilometres of any wind turbine taken place?	Project Owner	Compliant	Previously audited	N/A
2.38	Has there been a complaint regarding television/radio transmission during the operation of the project, from a receptor located within 5 kilometres of any wind turbine? If so, was the quality of transmission investigated and, where problems are found to be attributable to the project, were they rectified within three months of the receipt of the complaint through the implementation of the measures outlined in this item.	Project Owner	Compliant	No complaints on complaints register	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
2.39	Has the project been designed and constructed in consultation with registered communications licensees (including emergency services) to ensure that risks to these services are minimised as far as reasonable and feasible. Have any remedial measures been necessary to rectify any issues?	Project Owner	Compliant	Signed off as part of Audit 2 (May 2014). Undertaken as part of the planning process. Appendix 17 of EA.	N/A
Dust					
2.43	Is dust being appropriately managed at the site?	3rd party	Compliant	Refer to Air Quality Management Plan. OEMP audit	N/A
Water quality					
2.44	Has there been any incidences that have resulted in the pollution of waters? i.e. have the works been taken place in compliance with Section 120 of the POEO Act?	3rd party	Compliant	No incidents	N/A
2.45	Have soil and water management controls been employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities, in accordance with Landcom's Managing Urban Stormwater: Soils and Conservation.	3rd party	Compliant	Ongoing auditing by ER of items carried over from construction is occurring.	Yes
Waste					
2.46	Is the site accepting any waste generated outside except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.	3rd party, GE	Compliant	No waste accepted	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
2.47	Is waste generated on site being reused or recycled where possible	3rd party, GE	Compliant	Refer to Waste Management Plan OEMP	N/A
2.48	Is all liquid and non liquid waste that is generated on site assessed and classified in accordance with Waste Classification Guidelines?		Compliant	Liquid waste would be oil and would be recycled. Hasn't occurred as yet. Solids are recycled or sent to the landfill	N/A
2.49	Is no green waste being burnt on site	Project Owner, 3rd party, GE	Compliant	Refer to Waste Management Plan OEMP	N/A
Community					
2.51	Has a Community Enhancement Program Fund been established and are the required payments of \$2,500 per operational wind turbine being contributed to the fund.	Project Owner	Compliant	Annual payment for Bombala and Cooma Councils	N/A
Environmental Monitoring and Auditing					
3.10	Has a noise compliance report been prepared for the approval of the Director - General which assesses the performance of the project against operational noise criteria and/or standards specified in conditions 2.17 to 2.20. The report is to be prepared within 12 months of the commencement of operation of the project. Have the		In hand	Refer to above conditions 2.17 and 2.18. Substation is being assessed as follow up report using appropriate guidelines	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
	results been submitted to the director general within one month of the completion of the monitoring?				
3.20	Did the noise compliance monitoring indicate that noise from the wind turbines exceeds the noise limits specified under condition 2.17 to 2.20? Were reasonable and feasible noise mitigation and management measures implemented to achieve compliance with the noise limits?	Project Owner	N/A		N/A
3.30	Are reports outlining the outcomes of the Bird and Bat Monitoring Program being submitted to the director general on an annual basis for the first five years of operation and every two years thereafter from the commencement of operation (unless otherwise agreed to by the Director - General). The reports must be prepared within two months of the end of the reporting period.	Project Owner	N/A	Quarterly Tech reports being sent to OEH and DoPE. Solution to an initial problem of finding a suitable ecologist to ID species has been resolved. Implementing adaptive management processes to address issues raised by OEH on the Eastern Bentwing bat. September will be a full migration study on the species - above and beyond the requirements of the BBMP.	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
4.10	Is the Compliance tracking program being used, during construction and operation, to track the requirements of the approval including for the purposes as outlined in dot points a) through to e)	Project Owner, 3rd party	OoC	Compliance register observed and reviewed annually. Audit is being undertaken by ER. 'Provisions for reporting environmental incidents to the Director-General during construction and operation' is not included in the OEMP. Provisions for reporting pollution environmental incidences included as part of the EPA Licence and Emergency response plan but these do not necessarily cover off all environmental incidents. OEMP and ERP to define environmental incident. Reporting protocol to include notifying EPA and DG. Suggest flow chart in ERP to include notification of the DGR. Replace superseded version of the ERP currently on display with a hardstand.	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
Community Information, Consultation and Involvement					
5.10	Is all documentation relevant to the approval available for public inspection	Project Owner	N/A	No request to date	N/A
5.20	Has a website been established? Is it being maintained and kept up to date?	Project Owner	Compliant	Link to documents observed	N/A
5.30	Are the following available for community complaints f. a 24 hour telephone number on which complaints about construction and operational activities at the site may be registered; b. a postal address to which written complaints may be sent; and c. an email address to which electronic complaints may be transmitted. The telephone number, the postal address and the e-mail address shall be advertised in a newspaper circulating in the locality on at least six monthly intervals during construction and at least yearly intervals during the operation of the project. These details shall also be provided on the Proponent's internet site. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public.	Project Owner	Compliant	Refer OEMP audit	N/A
5.40	Has a complaints register been established?	Project Owner		Refer OEMP audit	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
5.50	Has a community information plan been prepared? Is it being implemented?	Project Owner	Compliant	Compliant as per 26/27 May 2014 Approval report. CIP sighted	N/A
Environmental Management					
6.10	Has an Environmental Representative been appointed and approved prior to construction and operational activities.	Project Owner	Compliant	Nick Graham Higgs - ER approved	N/A
6.40	Has an Operation Environmental Management Plan been prepared in accordance with the Guideline for the Preparation of Environmental Management Plans (DUAP, 2004) or its latest revision? Does it address all the issues listed in this approval condition? Was it submitted for the approval or the Director - General no later than one month prior to the commencement of operation? Was written approval received prior to operation commencing	Project Owner, 3rd Party, GE	Compliant	OEMP has been approved by DG.	N/A
STATEMENT OF COMMITMENTS					
7.05	Is landscape planting where screening is deemed appropriate being undertaken		Compliant	Refer Landscape and Rehabilitation Management Plan of OEMP	N/A
7.10	Are work activities occurring within recommended working hours, according to the EPA, where practicable (i.e. 7.00 am to 6.00 pm, weekdays and 8.00 am to 1.00 pm on Saturdays). Any proposed work outside of these hours will entail close consultation with the affected community.		Compliant	Refer Landscape and Rehabilitation Management Plan of OEMP	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
7.105	Is there/has there been liaison with Volcan Australia Pty Ltd and Geogen Victoria Pty Ltd? Are they being informed of any modifications to the Project design		N/A		N/A
7.11	Are local contractors being used where it is feasible?		Compliant	Refer Landscape and Rehabilitation Management Plan of OEMP	N/A
7.65	Are members of the public that need to go near emitting structures accompanied by a trained and qualified staff member?		Compliant	No public access. Any visitors accompanied by BRWF staff	N/A
7.66	Are all regulations under the NSW Rural Fires Act 1997 and the Snowy Monaro and Bombala Bushfire Risk Management Plans being adhered to?		Compliant	Refer Emergency Response Plan audit OEMP	
7.70	Have construction crews and maintenance staff been trained on the topic of bushfire risk management and risks that could be present at the Project.		Compliant	Refer audit OEMP	N/A
7.71	Is basic firefighting equipment available at each active site, including fire extinguishers, knapsacks and other equipment suitable for initial response actions with a minimum of one trained person on-site.		Compliant	All turbines, vehicles have equipment and there is a knapsack for hot works. refer NSW CoA 2.32	N/A
7.72	Are mobile telephone and UHF radio communications services maintained		Compliant	Refer Electronic Interference plan OEMP audit	N/A

Audit Report Number: 1

Reference	Required Audit Action, and Terms of Approval	Responsibility	Evaluation	Comments	Site inspection
7.73 and 7.74	Is the Collector substation facility surrounded by a gravel and concrete area, free of vegetation, to provide an APZ? Is it bunded with a capacity exceeding the volume of the transformer oil?		Compliant	Refer Emergency Response Plan OEMP audit	N/A
7.75	Are there APZ's around WTG's, transmission line easements and ancillary structures to minimise the spread of fire. Have workplace health and safety protocols will be developed to minimise the risk of fire for workers in the control room and amenities.		Compliant	Design stage. Safety inductions undertaken	N/A
7.77	Are Flammable materials and ignition sources brought onto the Project site? Are they handled and stored as per manufacturer instructions.		Compliant	Refer Emergency Response Plan audit of OEMP	N/A
7.78	Is lightning protection installed correctly to minimise risk of malfunction.		Compliant	Design issues	N/A
7.90	Are there skip bins and recycling bins on-site to handle packaging materials and domestic waste.		Compliant	Observed	Yes
7.92	Are on-site toilets drained by a septic tank or an enclosed unit?		Compliant		No
7.93	Are all chemicals and oils treated being treated as contaminated waste at the Cooma landfill?		Compliant	Refer Waste Management Plan audit in OEMP	Yes

APPENDIX C COMMONWEALTH EPBC CONDITIONS – DETAILS OF AUDIT FINDINGS.

This section details the findings of the audit against the EPBC Approval Conditions for the project. The completed Audit Protocol is contained in the table below.

Approval item	Condition	Evaluation	Comment
1	The person undertaking the action must carry out the action in accordance with the following documents: Boco Rock Wind Farm Major Projects Application 09-0103, Environment Assessment dated November 2009, Preferred Project Report and Response to Submissions dated May 2010, NSW Director General's Assessment Report and approval conditions (June 2010), and the conditions of this approval. In the event of any inconsistencies, the conditions of this approval prevail to the extent of the inconsistency.	Compliant	Routines audits are being undertaken. Where non compliances have been found, a corrective action has been issued. All corrective actions identified at each prior audit have been resolved and closed.
2	Within 12 months of any Construction commencing, the person undertaking the action must secure the Offset Package including long term protection and management of the relevant Offset Sites and provide the Offset Package to the Minister for his approval.	Compliant	Signed off at November 2014 audit.
3	In order to minimise potential impacts on the EPBC Act listed Grassland Earless Dragon and Striped Legless Lizard, in accordance with the NSW Director General's Assessment Report and approval conditions (June 2010) and the Statement of Commitments contained in the Preferred Project Report and Response to Submissions (May 2010), the person undertaking the action must ensure that Works are not undertaken at the Springfield and Sherwins turbine clusters during the breeding season (1 November to 31 January) for these species, unless otherwise authorised in the CEMP approved by the Minister under condition 4 of this approval.	Compliant	Signed off at November 2014 audit. Provisions are included in the OEMP to ensure this condition is met during the operation phase of the audit.

Audit Report Number: 1

Approval item	Condition	Evaluation	Comment
4	<p>In order to minimise potential impacts on EPBC Act listed threatened species and communities, prior to any Works commencing and in accordance with the NSW Director General's Assessment Report and approval conditions (June 2010) and the Statement of Commitments contained in the Preferred Project Report and Response to Submissions (May 2010), the person taking the action must develop and implement a Construction Environmental Management Plan (CEMP), which must include but not be limited to:</p> <ul style="list-style-type: none"> a) Flora and fauna management b) Weed management c) Sediment and erosion control d) Bushfire management e) Habitat corridors and linkages <p>The final version of this plan must be submitted to the Minister for approval no later than 1 month prior to any Works commencing. The approved plans must be implemented.</p>	Compliant	Signed off at November 2014 audit.
5	<p>Within 18 months of the Cessation of Operation of the Action, the person undertaking the action must submit a decommissioning plan to the Minister for approval. The person taking the action must have consideration to matters protected under the EPBC Act at this time and ensure that these matters will not be significantly impacted by the decommissioning. Decommissioning must not commence until or unless the Minister has approved the decommissioning plan.</p>	N/A	
6	<p>If at any time the NSW Director General's Assessment Report and approval conditions (June 2010) are modified, the person proposing to take the action must notify the Department in writing of the actual date of the modification.</p>	Compliant	Signed off at November 2014 audit. No changes or modifications have occurred since this time.
7	<p>Within 10 days of Commencement of the Action, the person taking the action must advise the Department in writing of the actual date of commencement.</p>	Compliant	Signed off at November 2014 audit.

Audit Report Number: 1

Approval item	Condition	Evaluation	Comment
8	Within three months of every 12 month anniversary of the Commencement of the Action, the person undertaking the action must provide a report to the Department demonstrating compliance with the conditions of this approval over the previous 12 months. This report must include details of how the CEMP required by the conditions of this approval has been implemented. Annual reports must be provided until the Minister is satisfied that the person undertaking the action has complied with all conditions of the approval.	Compliant	November 2014 report was sent on 8 December to Commonwealth. Suggest send commonwealth results of this audit and ask if they require reporting to continue.
9	Within three months of every 12 month anniversary following the Cessation of Operation of the Action, the person undertaking the action must provide a report to the Department demonstrating compliance with the Decommissioning Plan required by the conditions of this approval and how it has been implemented. Annual reports must be provided until the Minister is satisfied that the person undertaking the action has complied with all conditions of the approval.	N/A	
10	Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	N/A	The Minister has not directed an independent audit.
11	If the person taking the action wishes to carry out any activity otherwise than in accordance with the CEMP and the Decommissioning Plan referred to in the conditions of this approval, the person taking the action must submit for the Minister's approval a revised version of any such plan. The varied activity shall not commence until the Minister has approved	N/A	The CEMP and Decommissioning plan are not relevant to this phase of works.

Audit Report Number: 1

Approval item	Condition	Evaluation	Comment
	the varied plan in writing. If the Minister approves such a revised plan, that plan must be implemented in place of the plan originally approved.		
12	If the Minister believes that it is necessary or desirable for the better protection of listed threatened species and communities to do so, the Minister may request that the person undertaking the action make specified revisions to the plans approved pursuant to the conditions of this approval and submit the revised plan for the Minister's approval. The person undertaking the action must comply with any such request. The revised approved plan must be implemented. Unless the Minister has approved the revised plan, then the person taking the action must continue to implement the plan originally approved.	N/A	The Minister has not requested any changes to approved plans.
13	If, at any time after five years from the date of this approval, the person taking the action has not commenced the action, then the person taking the action must not commence the action without the written consent of the Minister.	Compliant	Action commenced.
14	The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the above conditions of approval, including measures taken to implement the management plans required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Compliant	Records are being checked as part of this audit process.

APPENDIX D OBSERVATION OF CONCERNS.

Observation of Concern (OoC) Form	
OoC No.: <u>1</u>	
Company: <u>CWP</u>	Audit Date: <u>26.08.2015</u>
Activities Under Review: <u>OEMP Organisational Structure & Resp.</u>	
Audit Criteria: <u>OEMP</u>	Category of Non-Conformity <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Major <input type="checkbox"/> Critical
Type of Audit: <input checked="" type="checkbox"/> External Audit <input type="checkbox"/> Internal Audit	
Requirement (Standard Clause #, procedure #): <u>3.1 - 3.5 / 3.7</u>	

Observation:
<u>Organisational structure & specific responsibilities</u>
<u>have not been updated in OEMP to reflect</u>
<u>existing structure</u>
Proposed Action (s): <u>Update OEMP</u>
Date action is to be completed by: <u>End of Oct-15</u>

Action taken:
Client Representative Name: Signature:
Date:

Observation of Concern (OoC) Form	
OoC No.: <u>2</u>	
Company: <u>CWP</u>	Audit Date: <u>26.08.2015</u>
Activities Under Review: <u>Reptile Management Plan</u>	
Audit Criteria: <u>OEMP</u>	Category of Non-Conformity <input type="checkbox"/> Minor <input type="checkbox"/> Major <input type="checkbox"/> Critical
Type of Audit: <input checked="" type="checkbox"/> External Audit <input type="checkbox"/> Internal Audit	
Requirement (Standard Clause #, procedure #): <u>Reptile Relocation Procedure</u>	

Observation:
<u>No information on the location of relocation sites</u>
Proposed Action (s): <u>Update OEMP with relocation sites</u>
Date action is to be completed by: <u>End of OCT-15</u>

Action taken:
Client Representative Name: Signature:
Date:

Observation of Concern (OoC) Form	
OoC No.: <u>3</u>	
Company: <u>CWP</u>	Audit Date: <u>26.08.2015</u>
Activities Under Review: <u>landscape Rehabilitation Mgmt Plan</u>	
Audit Criteria: <u>OEMP</u>	Category of Non-Conformity <input type="checkbox"/> Minor <input type="checkbox"/> Major <input type="checkbox"/> Critical
Type of Audit: <input checked="" type="checkbox"/> External Audit <input type="checkbox"/> Internal Audit	
Requirement (Standard Clause #, procedure #): <u>Maintain Rehabilitation</u>	

Observation:
<p>Areas containing large areas of bare soils require reseeded. May be an opportunity to request landholders remove or reduce stock during rehabilitation.</p>
<p>Proposed Action (s): <u>Undertake further rehabilitation</u></p>
<p>Date action is to be completed by: <u>End of 2015</u></p>

Action taken:
<p>Client Representative Name: Signature:</p>
<p>Date:</p>

Observation of Concern (OoC) Form	
OoC No.: <u>4</u>	
Company: <u>CWP</u>	Audit Date: <u>26.08.2015</u>
Activities Under Review: <u>Compliance Tracking</u>	
Audit Criteria: <u>NSW Approval</u>	Category of Non-Conformity <input type="checkbox"/> Minor <input type="checkbox"/> Major <input type="checkbox"/> Critical
Type of Audit: <input checked="" type="checkbox"/> External Audit <input type="checkbox"/> Internal Audit	
Requirement (Standard Clause #, procedure #): <u>4.1(f)</u>	

Observation:
OEMP does not include 'provisions for reporting to the DG' any environmental incidents. Include a definition of environmental incidents as per PoEO Act in OEMP. Update
Proposed Action (s): <u>Update OEMP (ERP flow chart) in ERP.</u>
<u>Update OEMP & flow chart.</u>
Date action is to be completed by: <u>End of Oct.</u>

Action taken:
Client Representative Name: Signature:
Date: