

## **Attachment 2 – NGRWF Detailed Audit Response (16<sup>th</sup> March 2017):**

### 1 Purpose

The purpose of this document is to provide a detailed response to the findings and recommendations from the environmental audit undertaken by Beca Pty Ltd (dated 15<sup>th</sup> March 2017) for the Gullen Range Wind Farm project on the 17<sup>th</sup> and 18<sup>th</sup> of January 2017. This document gives effect to a stated requirement of condition 3.3 of the Project Approval (07\_0118).

### 2 Introduction

The Independent Environmental Audit Report required by condition 3.3. was developed by auditor Melody Valentine from Beca Pty Ltd. Section 2.3 of the Audit Report provides the following summary of findings:

*“The audit was completed on the 17<sup>th</sup> and 18<sup>th</sup> of January 2017 and found that:*

- *The auditor received the full co-operation of Gullen Range Wind Farm Project staff and all involved in the audit.*
- *The objective of this audit was met.*
- *The project was found to comply with the requirements of the Project Approval (including the Statement of Commitments), and EPA Licence.*
- *The Project demonstrated a good level of environmental management and a focus on on-going improvement with several initiatives underway.*
- *No items of non-compliance were identified during the audit.*
- *The following recommendations for on-going environmental performance were identified during the audit:*
  - *Consider updating the SDS register to exclude items that do not require listing, providing a simplified register that may be easier to keep up-to-date.*
  - *That the preparation of a ‘weed baseline map’ (or similar) be prepared to help monitor progress in weed treatment.*
  - *That clarification is sought from DPE that use of turbine lighting for access is acceptable. It is noted that this recommendation was actioned after the date of the audit, though before this report was finalised, with agreement from DPE received. The recommendation is considered to have been sufficiently addressed and can be closed.*
  - *That each bunded storage cabinet is labelled with the designed maximum storage capacity to avoid over-storage as per the requirements of the Work Health and Safety Regulation 2011.*
  - *That the register of TV / radio transmission rectification be updated to correctly reflect the status of the works as complete.*
  - *Consider making information publicly available to report on social performance”.*

Detailed Proponent responses to the findings and recommendations from the Audit are captured in the following section.

### 3 Response to Audit Findings and Recommendations

Audit Reference:	Type	Audit Finding or Recommendation:	Proponent Response:
	Finding	<i>The auditor received the full co-operation of Gullen Range Wind Farm Project staff and all involved in the audit.</i>	NGRWF supports the Auditors' finding.
	Finding	<i>The objective of this audit was met.</i>	NGRWF supports the Auditors' finding.
	Finding	<i>The project was found to comply with the requirements of the Project Approval (including the Statement of Commitments), and EPA Licence.</i>	NGRWF supports the Auditors' finding.
	Finding	<i>The Project demonstrated a good level of environmental management and a focus on on-going improvement with several initiatives underway.</i>	NGRWF supports the Auditors' finding.
	Finding	<i>No items of non-compliance were identified during the audit.</i>	NGRWF supports the Auditors' finding.
Section 3.1.8	Recommendation	<i>Consider updating the SDS register to exclude items that do not require listing, providing a simplified register that may be easier to keep up-to-date.</i>	<p>The Auditors' comments relate to the Safety Data Sheet (SDS) register sighted during the Audit. The Auditors' recommendation reflects the legislation which only requires onsite chemicals that are hazardous, dangerous or above manifest quantities to be recorded in the SDS register. The SDS register for Gullen Range Wind Farm captures all onsite chemicals and not just those required by legislation to be recorded.</p> <p>The chemicals used and stored on the wind farm site are chemicals associated with turbine maintenance. Onsite responsibility for the management of chemical storage and handling sits with GWA.</p>

			<p>Since the completion of the Audit GWA has finalised a subscription to 'Chem Watch'.</p> <p>'Chem Watch' is an online resource offering chemical management solutions. A key feature of 'Chem Watch' is the SDS database which includes current SDS's for over 20 million chemicals. Subscribers are able to set up and tailor 'Chem Watch' to meet the specific requirements of their business.</p> <p>The 'Chem Watch' system is currently being set up for GWA but once the system is tailored to the GWA business it will provide easy access to:</p> <ul style="list-style-type: none"> <li>• Current SDS's for all onsite chemicals.</li> <li>• Chemical alerts for all onsite chemicals, including recall notices, safety notices and SDS updates.</li> </ul> <p>The introduction of the 'Chem Watch' system represents part of the on-going commitment to improving onsite compliance practices.</p> <p>GWA has acknowledged the Auditor's recommendation and confirmed that the SDS register will be subject to review as part of the introduction of both the 'Chem Watch' and MyOSH systems in to the GWA business. GWA has confirmed that for completeness the register will likely continue to capture at least those chemicals required for maintenance activities, irrespective of whether the chemicals are hazardous, dangerous or above manifest quantities.</p> <p>No further action is currently proposed.</p>
Section 3.1.12	Recommendation	<p><i>That the preparation of a 'weed baseline map' (or similar) be prepared to help monitor progress in weed treatment.</i></p>	<p>In response to the Auditors' recommendation NGRWF has commenced a photographic survey across the entire wind farm site. The survey, once complete, will include images from representative locations across all 44km of access tracks and 73 turbine hardstands within the project footprint.</p> <p>The photographs include time, date and coordinates recorded on the image. This information will assist in the use of these</p>

			<p>photographs as comparative weed baseline for future weed control activities on the wind farm site.</p> <p>NGRWF considers that this baseline photographic survey will give effect to the Auditors' recommendation.</p>
<p>Section 3.4 Item 18</p>	<p>Recommendation</p>	<p><i>That clarification is sought from DPE that use of turbine lighting for access is acceptable. It is noted that this recommendation was actioned after the date of the audit, though before this report was finalised, with agreement from DPE received. The recommendation is considered to have been sufficiently addressed and can be closed.</i></p>	<p>Approval for the use of lighting for turbine access was received from the Department of Planning and Environment (DPE) in a letter dated 6<sup>th</sup> February 2017.</p> <p>In Section 3.4 (Item 18) of the Audit Report the Auditor states "This recommendation is considered to have been sufficiently addressed and can be closed".</p> <p>NGRWF supports the Auditors' finding.</p>
<p>Section 3.4 Item 58</p>	<p>Recommendation</p>	<p><i>That each bunded storage cabinet is labelled with the designed maximum storage capacity to avoid over-storage as per the requirements of the Work Health and Safety Regulation 2011.</i></p>	<p>As recommended by the Auditor, both chemical storage cabinets now feature the maximum storage capacity on the outside of the cabinet.</p> <p>NGRWF considers that effect has been given to the Auditors' recommendation.</p> <div data-bbox="1384 911 1933 1289" data-label="Image"> </div> <p>Cabinet 1</p>

			 <p>Cabinet 2</p>
<p>Section 3.4 Item 67</p>	<p>Recommendation</p>	<p><i>That the register of TV / radio transmission rectification be updated to correctly reflect the status of the works as complete.</i></p>	<p>The error in the tracking spreadsheet has been corrected to correctly record that all TV / radio transmission works have been completed. As cited in the Audit Report, evidence (an invoice) that the works had been completed at the subject property was shown to the Auditor during the Audit.</p> <p>There are no outstanding TV / radio transmission mitigation works outstanding for Gullen Range Wind Farm.</p> <p>NGRWF considers that effect has been given to the Auditors' recommendation.</p>
<p>Appendix C Item SoC95e</p>	<p>Recommendation</p>	<p><i>Consider making information publicly available to report on social performance.</i></p>	<p>SoC95(e) sets out a commitment to provide an annual report on the environmental and social performance of the wind farm and the consultation activities undertaken for the year.</p> <p>Environmental performance is recorded annually as part of the Annual Environmental Management Report (AEMR) required by</p>

			<p>condition 6.1 of the Project Approval (Application No. 07_0118). NGRWF submits this document to the DPE and makes this report publicly available via the Gullen Range Wind Farm website.</p> <p>NGRWF currently provides updates on social performance and the consultation activities as part of the company update provided at the Community Consultative Committee (CCC) meetings. This information is captured generally within the minutes for the CCC meetings which are made publicly available on the Gullen Range Wind Farm website.</p> <p>Moving forward NGRWF proposes, pending support from the Committee, to capture social performance as a stand-alone agenda item for the CCC to ensure that effect is given to social performance reporting requirement within Commitment 95(e)</p> <p>NGRWF considers that the proposed action will give effect to the Auditor’s recommendation and the stated requirement within the Commitment.</p>
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