

Compliance Tracking Program

Gullen Range Wind Farm

NGRWF-P-0006-02

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Glossary

AEMR	Annual Environmental Management Report
AS/NZ	Australia / New Zealand Standard
BBAMP	Bird and Bat Adaptive Management Plan
BCD	Biodiversity and Conservation Division
BJCE	Beijing Jingneng Clean Energy (Australia) Holding Pty Ltd
CoA	Condition of Approval
CTP	Compliance Tracking Program
DPE	NSW Department of Planning and Environment
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
GWA	Goldwind Australia Pty Ltd (GWA)
GWC	Goldwind Capital (Australia) Pty Ltd
GRWF	Gullen Range Wind Farm
ISO	International Standards Organisation
kV	Kilo-volt
NGRWF	New Gullen Range Wind Farm Pty Ltd
OEMP	Operational Environmental Management Plan
Project Approval	Refers to the Gullen Range Wind Farm Project Approval (Application No. 07_0118).
Proponent	New Gullen Range Wind Farm Pty Ltd

1 Purpose

The purpose of the Gullen Range Wind Farm (GRWF) Compliance Tracking Program is:

- To track compliance with the requirements of the Project Approval during the construction, operation or decommissioning of the project; and
- To meet the requirements of condition 6.1 of the Project Approval.

This Compliance Tracking Program has been developed to meet the following requirement of the Project Approval:

6 Compliance Tracking Program

6.1 *Prior to the commencement of construction, the Proponent shall develop and implement a **Compliance Tracking Program** for the project, to track compliance with the requirements of this approval during the construction, operation or decommissioning of the project and shall include, but not necessarily be limited to:*

- a) provisions for an Annual Environmental Management Report (AEMR) that is to be prepared and submitted to the Secretary throughout the operational life of the project. The AEMR must review the performance of the project against the Operational Environmental Management Plan, the conditions of this approval and other licences and approvals relating to the project;*
- b) provisions for periodic reporting of the compliance status to the Secretary including at least prior to the commencement of construction of the project, prior to the commencement of operation of the project, and prior to the commencement of decommissioning;*
- c) a program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 – Guidelines for Quality and/or Environmental Management Systems Auditing;*
- d) procedures for rectifying any non-compliance identified during environmental auditing or review of compliance;*
- e) mechanisms for recording environmental incidents and actions taken in response to those incidents;*
- f) provisions for reporting environmental incidents to the Secretary during construction, operation and decommissioning; and*
- g) provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.*

2 Compliance Tracking Program Requirements

2.1 CTP Requirements

Table 1 below outlines the requirements of condition 6.1 of the Project Approval and identifies where in this document the requirement has been addressed.

Table 1

	Requirement:	Reference:
a	<i>provisions for an Annual Environmental Management Report (AEMR) that is to be prepared and submitted to the Secretary throughout the operational life of the project. The AEMR must review the performance of the project against the Operational Environmental Management Plan, the conditions of this approval and other licences and approvals relating to the project;</i>	Section 2.2
b	<i>provisions for periodic reporting of the compliance status to the Secretary including at least prior to the commencement of construction of the project, prior to the commencement of operation of the project, and prior to the commencement of decommissioning;</i>	Section 2.3
c	<i>a program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 – Guidelines for Quality and/or Environmental Management Systems Auditing;</i>	Section 2.4
d	<i>procedures for rectifying any non-compliance identified during environmental auditing or review of compliance;</i>	Section 2.5
e	<i>mechanisms for recording environmental incidents and actions taken in response to those incidents;</i>	Section 2.6
f	<i>provisions for reporting environmental incidents to the Secretary during construction, operation and decommissioning; and</i>	Section 2.7
g	<i>provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.</i>	Section 2.8

2.2 CoA 6.1(a) – Annual Environmental Management Report

provisions for an Annual Environmental Management Report (AEMR) that is to be prepared and submitted to the Secretary throughout the operational life of the project. The AEMR must review the performance of the project against the Operational Environmental Management Plan, the conditions of this approval and other licences and approvals relating to the project;

On an annual basis NGRWF will prepare and submit to the Secretary, an Annual Environmental Management Report (AEMR) in accordance with condition 6.1(a).

In accordance with written clarification previously received from the Department of Planning and Environment (DPE), NGRWF will prepare the AEMR on the following basis:

- The AEMR will capture the period 24th December to 23rd December (inclusive) annually (the AEMR period).

- The AEMR will be submitted annually to the Secretary within three months of the end of the AEMR period.

In accordance with condition 6.1(a), the AEMR will include a review of the performance of the project against the Operational Environmental Management Plan, the conditions of the Project Approval and other licences and approvals relating to the Project.

2.3 CoA 6.1(b) – Periodic Reporting of Compliance Status

provisions for periodic reporting of the compliance status to the Secretary including at least prior to the commencement of construction of the project, prior to the commencement of operation of the project, and prior to the commencement of decommissioning;

NGRWF will review the compliance status for the wind farm and submit periodic compliance reports to the Secretary.

Periodic compliance reports will be triggered in the following circumstances:

- At the end of or at the commencement of each phase of the project, including the construction, operation and decommissioning phases of the project.
- Annually in accordance with condition 6.1(a) in the form of an AEMR.
- As requested by the Secretary during the operation of the wind farm.

2.4 CoA 6.1(c) – Independent Environmental Auditing

a program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 – Guidelines for Quality and/or Environmental Management Systems Auditing;

Independent environmental auditing on the Gullen Range Wind Farm will be undertaken in accordance with condition 3.3 of the Project Approval.

Independent Environmental Audits will be triggered in the following circumstances:

- At the two-year anniversary of the operation of the wind farm (condition 3.3 requirement).
- When directed by the Secretary (condition 3.3 requirement).
- At other opportunities identified at the discretion of NGRWF where an independent environmental audit will aid the demonstration of compliance.

In accordance with condition 3.3, NGRWF will progress Independent Environmental Audits on the following basis:

- An independent person or audit team will be nominated and formally presented to the Secretary for approval prior to the formal engagement of the auditor.
- The independent person audit team will carry out the audit in accordance with ISO 19011:2018 *Guidelines for Auditing Management Systems (supersedes ISO 19011:2003 – Guidelines for Quality and/or Environmental Management Systems Auditing)*.
- Audits will be required to:

- Assess compliance.
 - Assess the environmental performance of the project.
 - Review the effectiveness of the environmental management of the project.
 - Review the adequacy of the NGRWF response to any complaints made about the project.
- The Environmental Audit report will be submitted for comment to the Secretary within two months of the completion of the Audit.
 - NGRWF will include a detailed response to any recommendation contained within the audit report.

Where audit commitments exist within NGRWF environmental management plans, NGRWF will progress these audits in accordance with any requirements specified within the applicable management plan.

2.5 CoA 6.1(d) – Procedures for Rectifying Non-compliance

procedures for rectifying any non-compliance identified during environmental auditing or review of compliance;

Where any non-compliance is identified during environmental auditing or review of compliance, the non-compliance will be appropriately investigated.

If the non-compliance is substantiated and corrective actions are required, then corrective actions will be implemented as soon as practicable.

2.6 CoA 6.1(e) – Recording of Environmental Incidents

mechanisms for recording environmental incidents and actions taken in response to those incidents;

All environmental incidents and actions taken in response to those incidents will be recorded in writing in the NGRWF compliance system. The record will be supported with any photographs, witness statements or other evidence / information relevant to the incident.

Incident information will be retained for a minimum period of four years and will be available where required by relevant Governmental agencies.

2.7 CoA 6.1(f) – Reporting of Environmental Incidents

provisions for reporting environmental incidents to the Secretary during construction, operation and decommissioning; and

Reporting of environmental incidents will be undertaken in accordance with the requirements prescribed within:

- Condition 8.1 of the Project Approval (07_0118).
- Condition R2 of the Environmental Protection Licence (Licence No. 20365).

- Bird and Bat Adaptive Management Plan (BBAMP) – Appendix I of the OEMP.
- As otherwise required by documents within the OEMP.

2.7.1 Reporting Environmental Incidents to the Secretary

In accordance with condition 8.1, where an incident at Gullen Range Wind Farm presents actual or potential significant off-site impacts on people or the biophysical environment, notification will be made on the following basis:

- Initial notification will be made to both the Secretary and to any other relevant Governmental authorities as soon as practicable after the incident has occurred.

Other relevant Government authorities may include:

Agency:	Contact:
NSW EPA	Refer Section 2.7.2
SafeWork NSW	13 10 50
Fire and Rescue NSW (Crookwell)	000 (emergencies only)
State Emergency Services (Crookwell)	132 500
NSW Rural Fire Service (Crookwell)	(02) 4832 0268
Upper Lachlan Shire Council (Northern + Central / Pomeroy + Bannister + Kialla based incidents)	(02) 4830 1000
Goulburn Mulwaree Council (Southern / Gurrundah based incidents)	(02) 4823 4444
NSW Ministry of Health	(02) 9391 9000
Transport for NSW	13 22 13 A/H 13 27 01

- Within 7 days of the incident, NGRWF will provide a written incident report to the Secretary and any relevant Government authorities notified during the initial notification.

Where the exact date of the incident is unknown, NGRWF will provide the written incident report within 7 days of the date that it became aware of the incident.

The written report will be drafted in accordance with the template attached as Appendix A to this Compliance Tracking Program.

2.7.2 Reporting Environmental Incidents to EPA

Reporting of environmental incidents to the Environmental Protection Authority (EPA) will be undertaken by NGRWF in accordance with the requirements stated within the then current Environment Protection Licence (EPL) for the project.

Written details of the incident will be provided to the EPA in accordance with any requirements specified within the EPL.

For completeness, where notification is made to the EPA in accordance with the licence of the wind farm, NGRWF will provide notification to the Secretary in accordance with the procedure outlined within Section 2.7.1.

2.7.3 Reporting of BBAMP Incidents

Notification for bird or bat deaths or injuries on the project site that trigger notification to the Biodiversity and Conservation Division of DPE will be undertaken by NGRWF in accordance with the requirements of the then current version of the Bird and Bat Adaptive Management Plan (BBAMP).

2.8 CoA 6.1(g) – Ensuring Employee, Contractor and Sub-Contractor Compliance

provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.

To ensure that employees, contractors and sub-contractors are aware of their compliance obligations under the Project Approval, EPL and other project documentation (e.g., OEMP), NGRWF will:

- Provide all employees, contractors, and sub-contractors with advice on their compliance obligations as part of the site induction for the GRWF.

Inductions will be provided by either NGRWF or appropriate Goldwind Australia personnel and will be required to be undertaken prior to the employee, contractor or sub-contractor commencing work at GRWF.
- Capture of environmental compliance obligations as part of regular onsite tool-box talks and site meetings.
- Include environmental compliance alerts on the HSE noticeboard in the GRWF site office.
- Provide periodic updates to onsite employees to remind them of their environmental compliance obligations.

Changes to environmental compliance obligations will be communicated on an as required basis. Changes may occur as a result of changes to project approval documentation (e.g., commitments within the OEMP) or as a result of changes to applicable legislation.

Where employees, contractors or sub-contractors are required to undertake operational activities with a higher degree of environmental risk, environmental compliance obligations will be captured as

part of the pre-start discussions prior to works commencing. Necessary controls, e.g., spill kits, will be identified as part of the planning activities ahead of works commencing.

Appendix A – Written Incident Report Template

Administration:	
Project Approval No:	
Approval Holder:	
Contact Person:	Name:
	Contact Details:
Lot Number:	
Location (coordinates):	
Landholder notified:	Yes / No
Incident Details:	
Time and date of the Incident:	
Time and date Holder became aware of Incident:	
Quantity of release (if applicable):	
Actual or potential cause of Incident:	
Description of receiving environment (if applicable):	
Potential impacts:	
Sampling conducted or proposed (if applicable):	
Immediate actions undertaken to mitigate harm:	
Any measures identified to prevent / reduce risk of reoccurrence:	