



Bodangora Wind Farm

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Compliance Tracking Program  
(Project Approval Condition D5)

20 June 2018



Version	Summary of changes	Updated by	Reviewed by	Approved by
3 July 2017	New document			Megan Richardson
20 June 2018	Annual review and Modification 4 update	Alex McCormack	Tim Maddever	Stuart Black



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## 1. INTRODUCTION

### 1.1 Purpose

This document describes the Compliance Tracking Program for Bodangora Wind Farm for the pre-construction, construction and operational phases of the Project. It addresses Condition D5 of the Project Approval (MP 10\_0157). The report has been prepared by Infigen Energy Ltd on behalf of Bodangora Wind Farm Pty Ltd.

### 1.2 Background

Bodangora Wind Farm received planning approval on 30 August 2013 from the Minister for Planning and Infrastructure under Section 75J of the Environmental Planning and Assessment Act 1979. The Project Approval authorised the construction and operation of up to 33 wind turbine generators and associated infrastructure. The Project was subsequently modified as follows:

- Modification 1 – to increase the wind turbine blade diameter whilst maintaining the overall tip height. Approved 13<sup>th</sup> October 2015;
- Modification 2 – to modify the location of the substation, electrical infrastructure and access tracks. Approved 5<sup>th</sup> December 2016;
- Modification 3 – to modify the location of wind turbine 28 and 31 and a short section of access track. Approved 23 June 2017; and
- Modification 4 – to modify the access road and met mast micro-siting. Approved 22<sup>nd</sup> December 2017.



## 2. PROJECT APPROVAL CONDITIONS

The Project Approval includes conditions which are required to:

- Prevent, minimise, and/or offset adverse environmental impacts;
- Set standards and performance measures for acceptable environmental performance;
- Require regular monitoring and reporting; and
- Provide for ongoing environmental management of the Project.

The conditions are summarised in Table 2.1.

**Table 2.1 Project Approval conditions**

Part	Condition
Schedule A	Description of Project & Definitions
Schedule B	Administrative Conditions
Schedule C	Environmental Performance
Schedule D	Community Information, Reporting and Auditing
Schedule E	Construction Environmental Management
Schedule F	Operation Environmental Management
Schedule G	Additional Procedures
Appendix 1	Project Layout
Appendix 2	Noise Verification Report
Appendix 3	Noise Compliance Assessment



Schedule D, Condition D5 requires Bodangora Wind Farm Pty Ltd to develop and implement a Compliance Tracking Program as follows:

*The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this Approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the life of the Project. The Program shall include, but not necessarily be limited to:*

**Table 2.2 Condition of Consent compliance sections within this document**

D5 Conditions of Consent	Response within this document
<i>(a) provisions for the notification of the Secretary prior to the commencement of construction and prior to the commencement of operation of the Project (including prior to each stage, where works are being staged);</i>	Section 3.1
<i>(b) provisions for periodic review of the compliance status of the Project against the requirements of this Approval;</i>	Section 3.2
<i>(c) provisions for periodic reporting of compliance status to the Secretary, including a Pre-Construction Compliance Report, during construction reporting, and a Pre-Operation Compliance Report;</i>	Section 3.2
<i>(d) a program for independent environmental auditing in accordance with /ISO 19011:2003 - Guidelines for Quality and/or Environmental Management Systems Auditing;</i>	Section 3.3
<i>(e) mechanisms for recording environmental incidents during construction, and actions taken in response to those incidents;</i>	Section 3.4
<i>(f) provisions for reporting environmental incidents to the Secretary and relevant public authorities (including Council) during construction and for the life of the Project;</i>	Section 3.4
<i>(g) procedures for rectifying any non-compliance identified during environmental auditing, and review of compliance or incident management; and</i>	Section 3.5
<i>(h) 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 3.6

This report documents Bodangora Wind Farm Pty Ltd’s Compliance Tracking Program for Bodangora Wind Farm in accordance with Condition D5 of the Project Approval.



### 3. COMPLIANCE TRACKING PROGRAM

The following sections outline details of the Compliance Tracking Program.

Section 3.1 Notifications to Secretary

Section 3.2 Compliance status

Section 3.3 Environmental auditing

Section 3.4 Incident and non-compliance reporting

Section 3.5 Corrective actions

Section 3.6 Communication

#### 3.1 Notifications to Secretary

Notifications to the Secretary will be made in compliance with Condition D5 (a) and B19 Notification to Department of the Project Approval. Table 3.1 describes the format and timing of these notifications.

**Table 3.1 Notifications to the Secretary**

Stage	Description
Prior to commencement of construction	Written notification at least 1 week prior (NB. This letter was issued by email to the Department of Planning and Environment on 19/06/17)
Prior to commencement of operation	Written notification at least 1 week prior
Prior to commencement of decommissioning	Written notification at least 1 week prior
Prior to cessation of operations	Written notification at least 1 week prior



### 3.2 Compliance status

Periodic review of the compliance status of the Project against the requirements of the Project Approval will occur in accordance with Conditions D5 (b) and (c), D8 and D9 (Independent Environmental Audit) as outlined in Table 3.2.

**Table 3.2 Periodic review of compliance status**

Stage	Reporting	Status
Pre-construction	Pre-construction Compliance Report Provide to Secretary prior to commencement of construction	Completed July 2017 prior to construction
Construction	Construction Compliance Report 1 Provide to Secretary within 6 weeks of the first 6 months	Completed November 2017
	Construction Compliance Report 2 Provide to Secretary within 6 weeks of the first 12 months	Completed April 2018
	Within 1 year of construction commission and pay full costs of an independent environmental audit of the project. (D8) Within 3 months of commencing the audit provide an audit report to the Secretary (D9)	Due for completion end June 2018. Report will subsequently be sent to Secretary within 3 months as per Condition D9
Pre-operation	Pre-operation Compliance Report Provide to Secretary prior to commencement of operation (n.b. may overlap with construction compliance report depending on timing of construction/operation activities)	On track for completion within timeframe
Operation	Every 3 years thereafter of the construction independent environmental audit, commission and pay full costs of an independent environmental audit of the project (D8) Within 3 months of commencing the audit provide an audit report to the Secretary (D9)	Operations have not yet commenced





### 3.3 Environmental auditing

Environmental auditing in accordance with ISO 19011:2003 – Guidelines for Quality and/ or Environmental Management Systems Auditing will occur as outlined in Table 3.3.

**Table 3.3 Environmental audit program**

Stage	Reporting	Status
Construction	Within 3 months of commencement – Internal site inspection by Project Environmental Representative (ER)	Completed August 2017
	6 monthly intervals after commencement of construction – Internal Audit of CEMP	Completed December 2017 (n.b the June 2018 audit will be replaced with the Independent External Audit)
	Independent External Audit (CEMP)	On track for completion by end June 2018
	Monthly – Internal environmental site inspections (stability, rehabilitation, revegetation, habitat) by Project ER	Completed on monthly basis (NB. Project ER unavailable during September 2017)
Operation	<p>Within 15 months of completion – Operational Performance Audit</p> <p>BBAMP annually for the first 5 years and every 2 years thereafter</p> <p>Within 3 months of completion of construction - Road Dilapidation Report</p> <p>Undertake noise monitoring within 3 months of the commissioning of the wind farm</p>	Operations phase has not yet commenced

### 3.4 Environmental incident reporting and recording

Environmental incident reporting and recording during construction and life of project is outlined in Table 3.4.

As required by Conditions D6 and D7, recording and reporting will include all incidents and any non-compliance, with a requirement set out in a management plan or strategy related to the Project Approval.

#### *Incident Notification D6.*

*The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) immediately after the Proponent becomes aware of the incident. The notification must identify the project (including the project application number and the name of the project if it has one), and set out the location and nature of the incident.*



*Non-Compliance Notification D7.*

*The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) within 7 days after the Proponent becomes aware of any non-compliance. The notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.*

**Table 3.4 Incident and non-compliance reporting**

Stage	Reporting	Responsibility
Construction	Verbal notification immediately Written notification to the Department immediately after BWFPL made aware of incident or within 7 days after BWFPL made aware of a non-compliance	CATCON (Construction Principal Contractor) to BWFPL BWFPL to Department
Operation	Verbal notification immediately Written notification to the Department immediately after BWFPL made aware of incident or within 7 days after BWFPL made aware of a non-compliance	GE (Operations Principal Contractor) to BWFPL BWFPL to Department

For further information relating to other incidents and emergencies such as safety and environment and inspections, monitoring and auditing, please refer to the Bodangora Wind Farm Construction Environment Management Plan.

**3.5 Corrective actions**

In the event that any incident or non-compliance is identified then steps shall be taken to ensure adequate corrective actions are put in place. This may require consultation with relevant internal and external stakeholders to ensure the most appropriate actions are implemented.

**3.6 Communication**

All employees, contractors and sub-contractors are made aware of the relevant conditions of approval by:

- Site induction
- Site signage
- CEMP and sub-plans printed and available in site office or electronically available
- All other relevant Project Approval related plans or programmes printed and available for reference in site office