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6 February 2020

Ms Natasha Homsey
Environmental Assessment Officer
Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Homsey,

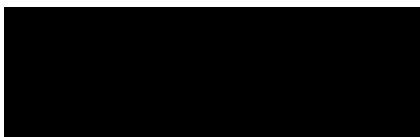
Project Approval MP10_0156: Collector Wind Farm: Condition C10 – Independent Audit Recommendations

Following submission of the final report of the Independent Environmental Audit (IEA) to the Secretary of the Department of Planning, Industry & Environment (DPIE) on 24 Jan 2020, Collector Wind Farm P/L (CWF) has prepared this follow-on submission detailing a response to the recommendations contained in the audit report and a timetable for their implementation.

This has been prepared as a further requirement of Condition C10, and submitted within the 3 month timeline defined within the condition (within 3 months of commissioning the audit, ie by required before 14 Feb 2020).

In the meantime, I would be happy to discuss any of the contents of the report or the attached response to recommendations in more detail.

Kind regards



Neil Weston
Project Manager



ATTACHMENT – CWF RESPONSE TO IEA RECOMMENDATIONS

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
AR1	MCoA A8H	<p>The Proponent shall ensure that all plant and equipment used on site, or in connection with the project, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>Whilst plant registers and plant pre-use authorisation processes appear satisfactorily implemented and include processes for obtaining the most recent service record for the plant, it is recommended the registers and process be updated to confirm hours of use prior to commencement on site and that the monthly audit of maintenance schedules be completed as provided for in Section 9.1 of the CEMP.</p> <p>It was noted during the audit that the service history for one excavator on site (EXK-29) indicated that the last service was almost 12-months prior to arrival at site and the accuracy of this record (i.e. should another service have been undertaken in that time) was not verified prior to commencing on site.</p>
CWF Actions & Timelines		<p><u>Action:</u> CWF has requested its contractors review the registers and service histories of all construction plant and machinery operating across the wind farm project to ensure any other such discrepancies are addressed, to demonstrate it is being maintained in a proper and efficient condition.</p> <p><u>Timelines:</u> Review and update to be completed before the end of March 2020.</p>	

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
AR2	MCoA A8F	<p>The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	<p>Confirm requirements for construction certificates under the Part 4 of the EP&A Act and obtain all required construction certificates for the building and structure works to be undertaken on the project.</p>
<p>CWF Actions & Timelines</p>		<p><u>Action:</u></p> <p>Following the IEA, CWF sought both legal and professional technical advice on the requirement for construction certificate(s) for the wind farm project. This advice confirmed that certification was required for all building works related to the erection of the approved wind turbines, the project substation and switchyard, and the site operations and maintenance building.</p> <p>Based on this advice, CWF has taken the following actions to manage the certification requirements of the wind farm:</p> <ul style="list-style-type: none"> • Appointed Pro Cert Group Pty Ltd in mid-Dec 2019 as the Principal Certifying Authority for all ‘building work’ associated with the project; • Obtained a construction certificate for ‘building work’ involving civil construction for wind turbine foundations and access roads; as issued on 8 January 2020 to CWF, DPIE and ULSC; • Worked with Pro Cert to set out a program of work to ensure construction certificate(s) are issued in a timely manner for all future ‘building work’ related to the erection of the approved wind turbines, the project substation and switchyard, and the site operations and maintenance building (prior to such work commencing); • Worked with Pro Cert to engage with the Upper Lachlan Shire Council to agree the process by which a Building Information Certificate (BIC) will be obtained for those relevant works on the project that have already been constructed, based on the delineation of site infrastructure defined by the Pro Cert team following review of site status and associated documentation (as described in Table 1 and Table 2 of the construction certificate issued on 8 January 2020). • Regularly updated the Compliance Team within DPIE on actions and progress in regards to construction certificates and the BIC process; with correspondence dated 11 December 2019, 19 December 2019, and 4 February 2020. 	

	<p><u>Timelines:</u> Timing of specific actions already completed are detailed above. Issue of future construction certificate(s) will be completed consistent with the project construction schedule (and issued to DPIE) through 2020. Completion of the BIC process will be defined through ongoing actions with Upper Lachlan Shire Council.</p>
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#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
AR3	MCoA B1	The clearing of all native vegetation is to be limited to the minimal extent practicably required. Details regarding the procedures for clearing vegetation and minimising the extent of clearing shall be clearly included in the Construction Flora and Fauna Management Plan contained in condition D25 (f). The Proponent shall ensure that no more than 47.6 hectares of EEC is cleared for the project, unless the Secretary agrees otherwise in consultation with OEH.	Whilst a Clearing register is being maintained and currently completed clearing appears less than the clearing limit, it is recommended that the register be updated to capture decimal points from the survey reports as the figures presently being reported are rounded down to the whole number.
CWF Actions & Timelines		<p><u>Action:</u> CWF has provided the recommendation to the civil contractor to be implemented into the existing clearance tracker.</p> <p><u>Timelines:</u> Completed</p>	

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
AR4	MCoA B18	<p>The Proponent must, in consultation with the local RFS, prepare a Bushfire Risk Management Plan based on the guidelines Planning for Bushfire Protection (RFS, 2006 or its latest edition). The plan must include:</p> <p>(a) details of the bushfire hazards and risks associated with the project;</p> <p>(b) mitigation measures including contingency plans;</p> <p>(c) procedures and programs for liaison and regular drills with the local RFS; and</p> <p>(d) procedures for regular fire prevention inspections by the local RFS and implementation of any recommendations.</p>	<p>The current approved Bushfire Risk Management Plan does not set out procedures and programs for liaison and regular drills with the local Rural Fire Service, as required by point (c) of this condition. It is recommended that the plan be reviewed and revised to include this information.</p>
CWF Actions & Timelines		<p>Action:</p> <p>One of the Health & Safety Officers for the construction contractor has been liaising with the NSW Rural Fire Service (RFS) in regards to bushfire risk management at the site and involvement with RFS. This is summarised as follows:</p> <ul style="list-style-type: none"> - Initial contacts with Goulburn RFS following commencement of the construction works and establishment of the site compound. This included a visit to the Goulburn RFS HQ on 28 August 2019 and follow up discussions on 12 September 2019 to seek active engagement with the project team; - The HSE Officer was referred to the Yass RFS Control Centre as the relevant centre for the area - A meeting was held on 16 October 2019 with the Incident Controller at Yass RFS HQ in regards to the project presence & activities; at which the approved Bushfire Risk Management Plan was shared [for comment] alongside an invitation to visit the project site for familiarisation; - It was noted that the local RFS station is at Gunning (approx. 5km from the site) but as a volunteer station this is only attended during drill and training nights, and has not yet accepted the invitation to attend site; - Likewise, given the extent of the bushfire crisis in NSW and numerous TOBAN days, no other RFS representative has been in a position to attend site. - All relevant RFS stations have been provided with key contact details of the construction team, and the invitation to attend site for familiarisation and combined training / drills has been left open for RFS response. 	

Timelines:

Action open, awaiting feedback / response from relevant RFS stations to site invitations.

CWF considers that the project has met the obligations of the particular condition; and will maintain engagement with the RFS through the remaining construction schedule of the project (and into operations).

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
AR5	MCoAD1	<p>The Proponent shall construct and operate the Project in a manner that minimises dust generation from the site, including wind-blown and traffic generated dust as far as practicable. All Project related activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should visible dust emissions attributable to the Project occur during construction and operation, the Proponent shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.</p>	<p>Given the similarities in exposure and activities, it is recommended that a more coordinated approach be taken between the two crushing plant activities and when activities need to cease in windy conditions causing excessive dust.</p>
<p>CFW Actions & Timelines</p>		<p><u>Action:</u> CWF had already noted the discrepancy between operations of the two crusher plant (managed under separate construction contracts) and had reached agreement between the contractors for coordinated action on ceasing crushing operations to avoid excessive dust generation (managed through the weekly site meeting held by CWF with all contractors).</p> <p>However, given progress with construction since the time of the audit, the crusher that was located within the substation area (at the north of the site) is no longer required and was removed from the site in late January 2020. Hence there will only be a single crusher operating on the site in future, and likely only to be in place for another 2 months or so. Its operation will continue to be managed to avoid excessive dust generation.</p> <p>As a result, the recommendation no longer applies.</p> <p><u>Timelines:</u> Completed</p>	

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
AR6	MCoA D17	Soil and water management measures consistent with Managing Urban Stormwater- Soils and Construction Volumes 1 and 2, 4th Edition (Landcom, 2004), or its latest version shall be employed during the construction of the Project to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.	TransGrid Substation works– It is recommended that UGL and TransGrid review erosion and sediment controls downslope of the substation to reduce scour potential of the earth bund and decrease the reliance on the sediment fence installed by RATCH-Australia which is located outside of the substation construction footprint (but within the overarching project footprint).
CWF Actions & Timelines		<p><u>Action:</u> Following the audit on site, the contractor for the TransGrid substation works, UGL, reviewed the erosion and sediment controls downslope (north) of the substation bench to assess the need for any further works. The UGL team has reported that the established sediment control fences have been improved and strengthened twice since that time – with fences being extended to cover a larger area and additional fencing support being installed.</p> <p>These controls are reviewed on a regular basis by the CWF site team, as well as the UGL team, to assess effectiveness and identify potential improvements – particularly after any rain events. This approach will continue through the remainder of the construction program.</p> <p>It is also noted that a permanent drainage and stormwater management solution will be installed by CWF for long-term management of water run-off from the substation.</p> <p><u>Timelines:</u> Completed (with ongoing review)</p>	

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
AR7	MCoA E5 & SoC 3.05	<p>The Proponent shall implement a revegetation and rehabilitation program for all areas of the Project footprint which are disturbed during the construction of the Project and which are not required for the ongoing operation of the Project, including temporary construction facility sites and sections of construction access roads. The Proponent shall ensure that all revegetation measures are implemented progressively where possible and in all cases within six months of the cessation of construction activities at the relevant area. Unless otherwise agreed to by the Secretary, the Proponent shall monitor and maintain the health of all revegetated areas until such time that the plantings have been verified by an independent and suitably qualified expert (whose appointment has been agreed to by the Secretary) as being well established, in good health and self-sustaining.</p>	<p>Rehabilitation and seeding of Lerida Road South was completed and seedling growth has been robust.</p> <p>The progressive rehabilitation and seeding of completed site access tracks has been delayed due to prolonged dry weather in recent months and has been limited to final top dressing of topsoil, with sediment controls remaining in place. It was reported that alternative soil binding agents, such as soil binder or hydro mulch is being considered in higher risk areas such as steep slopes. It is recommended that progressive rehabilitation and re-seeding be undertaken as soon as practicable and/or implement alternative soil binding agents, such as soil binder or hydro mulch, focussing on higher risk areas such as steep slopes, drainage zones and areas exposed to high winds, in consultation with the Soil Conservationist.</p>
CWF Actions & Timelines		<p><u>Action:</u></p> <p>Given the ongoing climatic conditions, CWF has been assessing options to effectively manage rehabilitation, to minimise dust and maintain integrity of disturbed land. This included consideration of soil binding agents, but it was concluded that the potential effects on the land and vegetation outweighed the benefit of their use.</p> <p>Instead, CWF has confirmed the following approach:</p> <ul style="list-style-type: none"> - Areas that have been rehabilitated with top soil will be seeded to facilitate pasture growth to hold the soil together; - An additional water truck will be brought to site to be dedicated to the regular irrigation of the rehabilitated areas and support new pasture growth - The success of the rehabilitation program will be monitored and tweaked as necessary. - This program will be gradually implemented across the site as rehabilitation progresses. 	

	<u>Timelines:</u> Ongoing (depending on weather patterns)Completed
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