



Willogoleche Wind Farm

EPBC Act Annual Compliance Report November 2018

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GLOSSARY AND ABBREVIATION OF TERMS

COEMP	Construction and Operational Environmental Management Plan
DEW	Department for Environment and Water (formerly Department of Environment, Water and Natural Resources)
DotEE	Department of the Environment and Energy
EBS	EBS Ecology
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
NTG	Natural Temperate Grassland
NVC	Native Vegetation Council
NVMU	Native Vegetation Management Unit
OMP	Offset Management Plan
TEC	Threatened Ecological Community
WTG	Wind turbine generator

DEFINITIONS ASSOCIATED WITH EPBC 2011/5850

Commencement of construction: Commencement of any works involved in the construction phase of the project, including clearing vegetation, the erection of any onsite temporary structures and breaking the ground for buildings or infrastructure. This excludes the:

- erection of signage, fences, barriers or bunting for the purpose of excluding areas containing listed threatened species and/or ecological communities; or
- works undertaken in the area identified as 'Site Compound Area', shown in the map at Appendix A3. [Appendix A3 of the Variation to Conditions Attached to Approval document for EPBC 2011/5850]

Department: The Australian Government Department responsible for the *Environment Protection and Biodiversity Conservation Act 1999*.

EPBC Offset Policy: means the *Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy October 2012*.

Minister: The Minister responsible for administering the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

Offset attributes: means an '.xls' file capturing relevant attributes of the Offset Area, including the EPBC reference ID number, the physical address of the offset site, coordinates of the boundary points in decimal degrees, the EPBC protected matters that the offset compensates for, any additional EPBC protected matters that are benefiting from the offset, and the size of the offset in hectares.

Shapefile: means an ESRI Shapefile containing '.shp', '.shx' and '.dbf' files and other files capturing attributes of the offset site, including the shape, EPBC reference ID number and EPBC protected matters present at the relevant site. Attributes should also be captured in '.xls' format.

Works: Includes all works involved in the construction, operation and decommissioning of the project. This includes preparatory works required to be undertaken including clearing vegetation, the erection of any on-site temporary structures, lay-down and stockpile areas, and the use of heavy equipment for the purpose of breaking the ground for buildings, infrastructure, or the removal of infrastructure. This excludes the erection of signage, fences, barriers or bunting for the purposes of excluding areas containing listed threatened species and/or ecological communities.

Table of Contents

1	INTRODUCTION.....	1
1.1	Project background.....	1
2	COMPLIANCE WITH CONDITIONS OF THE APPROVAL.....	2
3	LIST OF ATTACHMENTS	7

1 INTRODUCTION

EBS Ecology was engaged by ENGIE to complete an annual compliance report for the Willogoleche Wind Farm project, which was granted approval 28 January 2014, subject to conditions, under sections 130 (1) and 133 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The approval (EPBC 2011/5850) has effect until 31 January 2044. A *Variation to Conditions Attached to Approval* was made on 12 December 2016.

The approval is subject to eight conditions, one of which (approval Condition 7) states that:

Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. The report must remain on their website for a minimum of 12 months. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.

The action commenced 4 September 2017. This is the first compliance report for the project and covers from 4 September 2017 to 3 September 2018. This compliance report (including attachments) will be published on the Willogoleche Wind Farm website (<http://www.gdfsuezau.com/about-us/asset/Willogoleche-Wind-Farm>) prior to 3 December 2018.

1.1 Project background

The Willogoleche Wind Farm is located approximately 6 km west of the township of Hallett, in the mid north of South Australia, approximately 160 kilometres north of Adelaide. The project site extends about 7 km in a north-south direction and about 2 km in an east-west direction, covering a site area of more than 14 km². The 119MW wind farm will consist of the following components:

- Temporary construction facilities and laydown areas;
- 32 wind turbine generators (WTGs) and hardstand;
- Two meteorological towers;
- Access tracks;
- An underground electrical cable network;
- Above ground power lines;
- On-site grid connection infrastructure (substation); and
- Operations and maintenance facilities.

The following progress summary of the project is as of 13 November 2018:

- Approximately 11 WTGs have been constructed;
- Approximately 7 WTGs have been energised; and
- The remaining 21 WTGs are under construction.

2 COMPLIANCE WITH CONDITIONS OF THE APPROVAL

Compliance with the eight conditions associated with the 28 January 2014 approval (EPBC 2011/5850) and 12 December 2016 approval variation is presented below.

1. To minimise potential impacts on Iron-Grass Temperate Grassland of South Australia the person taking the action must ensure that:

- a. **The area identified as habitat for Iron-Grass Natural Temperate Grassland of South Australia to be cleared by the Willogoleche Wind Farm proposal, including tracks, cables and turbines, does not exceed 0.82 hectares.**
- b. **Any works within the Iron-Grass Natural Temperate Grassland of South Australia must be undertaken within 20 metres of the areas cleared for construction of the tracks, cables and turbines referred to in Condition 1a. Any damage caused to the grassland within this 20 metre buffer area must be rehabilitated in accordance with the Environmental Management Plan detailed at Condition 4. Signage and exclusion barriers must be erected around the edge of the buffer area prior to the commencement of works within the buffer area.**

1.a. Approximately 0.7396 hectares of *Iron-Grass Natural Temperate Grassland of South Australia* has been impacted by the Willogoleche Wind Farm, including tracks, cables and turbines. The areas cleared include:

- 1173 m² for turbine 11;
- 89 m² for turbine 19;
- 46 m² for turbine 24; and
- 6088 m² for turbine 28, its access track and underground cable run.

Therefore the impact on *Iron-Grass Natural Temperate Grassland of South Australia* has not exceeded 0.82 hectares.

Please refer to Attachment 1 *Iron-Grass NTG TEC Impact Areas* which show areas of *Iron-Grass Natural Temperate Grassland of South Australia* cleared for construction of wind farm infrastructure.

1.b. As outlined above, areas of *Iron-Grass Natural Temperate Grassland of South Australia* have been cleared for some of the turbines, access tracks and underground cables. However, no damage has occurred to the grassland outside of the areas cleared for the turbines, access tracks and underground cables.

Signage and exclusion barriers (flagging) were installed prior to the commencement of clearance within and adjacent to the *Iron-Grass Natural Temperate Grassland of South Australia* areas.

2. To offset the potential impacts on Iron-Grass Natural Temperate Grassland of South Australia, the person taking the action must secure an offset site of 4 hectares identified as 'proposed EPBC offset' in the maps at Appendices A1 and A2, under a Heritage Agreement under the South Australian Native Vegetation Act 1991. The Heritage Agreement must be submitted to the Department prior to being registered. The Heritage Agreement must be registered by 1 July 2018.

[Appendices A1 and A2 of the Variation to Conditions Attached to Approval document for EPBC 2011/5850]

An Offset Area 4 ha in size has been established adjacent to the Willogoleche Wind Farm boundary on Woodman Road (matching the 'proposed EPBC offset' in the maps at Appendices A1 and A2 of the approval) to offset the potential impacts on *Iron-Grass Natural Temperate Grassland (NTG) of South Australia*.

In-principle approval from the Native Vegetation Management Unit (NVMU) of the South Australian Department for Environment and Water (DEW) for the establishment of a Heritage Agreement under the *Native Vegetation Act 1991* over the Offset area, was confirmed on 2 February 2017 (HA 2016_1009). The process of assessing and activating a Heritage Agreement on the title, can be a protracted process (currently up to 2 years). ENGIE are awaiting registration of the title by the South Australian Lands Title Office.

3. To offset the potential impacts on Iron-Grass Natural Temperate Grassland of South Australia, the person taking the action must submit to the Minister for approval an Offset Management Plan (OMP) for the offset site at least three months prior to the commencement of construction.

Construction must not commence before the plan is approved by the Minister. The approved plan must be implemented.

The OMP must include, at a minimum, the following information:

- a) a textual description and map to clearly define the location and boundaries of the offset site. This must be accompanied with the offset attributes and a shapefile;**
- b) a schedule, including the process and timeframes, for registering the Heritage Agreement specified in Condition 2;**
- c) completion criteria and interim condition targets for Iron-Grass Natural Temperate Grassland of South Australia in accordance with the EPBC Offsets Policy;**
- d) details of management actions to protect and enhance the extent and condition of habitat values of the offset site including, but not limited to, management of livestock, weed control, erosion and sediment control, fire management, and restrictions on access;**
- e) a monitoring schedule, including the undertaking of ecological surveys by a qualified ecologist to assess the success of the management actions against completion criteria and interim condition targets;**
- f) the timing, responsibilities and performance criteria for management actions;**
- g) a commitment to include in the compliance reports detailed at Condition 8, reports on the management actions undertaken in the offset areas and the outcome of those actions, including identifying any need for improved management;**
- h) a description of the potential risks to successful management of the offset site, and a description of the contingency measures that would be implemented to mitigate these risks;**
- i) details of parties responsible for management, monitoring and implementing the plan, including their position.**

The action commenced on 4 September 2017. An Offset Management Plan (OMP) was submitted to the Minister for approval on 18 January 2017, which was more than three months prior to the commencement of construction (the action). The OMP was approved by the Minister on 3 February 2017.

The OMP includes a textual description and maps to define the location and boundaries of the Offset Area. The maps include eastings and northings / coordinates and there is also a shapefile for the Offset Area.

The OMP includes a section which outlines the timeframe for registering the Offset Area under a Heritage Agreement.

The OMP outlines the core management objectives for the Offset Area to increase the condition rating for the site from 2 to 7 and changing the site classification from a C Condition Class to a B Condition Class, over a 16 year period.

The OMP details management actions associated with the following:

- Grazing
 - Limiting stocking rates
 - Fencing
 - Water points
 - Adaptive management
- Weed Management
- Feral Animal Control
- Erosion and Sediment Control
- Fire Management
- Restrictions on Access

The OMP describes monitoring required to be undertaken by an independent, suitably qualified ecologist of four key ecological indicators, to assess the success of the management actions against the core management objectives to increase the condition rating and site classification, including:

- plant species diversity
- perennial native grass species diversity
- broad-leaf native herbaceous species diversity
- Tussock density

The OMP also outlines roles and responsibilities, timing and performance criteria, annual reporting requirements and the potential risks and associated contingency measures associated with the management actions.

Data collection for the first round of annual monitoring within the Offset Area was undertaken on 8 October 2018. However, since this is after the timeframe for this compliance report (4 September 2017 to 3 September 2018) the *Offset Area Monitoring Report 2018* will be submitted with the next annual compliance report. Note that October to early November is considered to be the most appropriate time to undertake monitoring of native Grasslands in the mid north region of SA (EBS Ecology 2017).

Refer to Attachment 2 for the *Willogoleche Wind Farm Offset Management Plan (EBS Ecology 2017)*.

4. To minimise potential impacts on Iron-Grass Natural Temperate Grassland of South Australia the person taking the action must submit an Environmental Management Plan for the operation of the wind farm to the Minister for approval 3 months prior to the commencement of works.

Works must not commence until the plan is approved. The approved plan must be implemented. This plan must include at a minimum, the following information:

- a) **details of management actions to protect and enhance the extent and condition of habitat values of the project site, including but not limited to management of livestock, weed control, erosion and sediment control, fire management, revegetation and restrictions on access;**
- b) **the timing, responsibilities and performance criteria for management actions;**
- c) **a monitoring schedule, including the undertaking of ecological surveys by a qualified ecologist to assess the success of the management actions against identified milestones and objectives;**
- d) **the nature of the proposed decommissioning works, including the turbine dismantling procedure;**
- e) **proposed land rehabilitation works and objectives, including a rehabilitation plan for any areas of Iron-Grass Natural Temperate Grassland of South Australia damaged by works within the buffer zone detailed in Condition 1b. The rehabilitation plan must include targets for vegetation quality and coverage, a monitoring program, and triggers for**

corrective actions.

- f) a commitment to include in the compliance reports detailed at Condition 8, reports on the management actions undertaken in the project areas and the outcome of those actions, including identifying any need for improved management;**
- g) a description of the potential risks to successful environmental management of the project site, and a description of the contingency measures that would be implemented to mitigate these risks;**
- h) details of parties responsible for management, monitoring and implementing the plan, including their position.**

The action commenced on 4 September 2017. The *Willogoleche Wind Farm Construction and Operational Environmental Management Plan* (COEMP) was submitted to the Minister on 18 January 2017, which was more than three months prior to the commencement of works. The COEMP was approved by the Minister on 3 February 2017.

The COEMP outlines the management measures and actions that are implemented to avoid, minimise and mitigate the potential environmental impacts associated with the construction and operation of the Willogoleche Wind Farm. In particular, the COEMP aims to minimise the potential impacts of the construction and operation of the Willogoleche Wind Farm on Iron-Grass NTG TEC.

The following environmental sub plans are incorporated into the Construction section of the COEMP:

- Erosion and Sedimentation Management.
- Ecological Management
 - Native Flora Control Measures
 - Weed Control Measures
 - Native and Threatened Fauna Control Measures
- Noise and Vibration Management
- Traffic Management
- Waste Management
- Air Quality Management
- Hazardous Chemicals and Dangerous Goods Management
- Cultural Heritage Management
- Fire Management

The following environmental sub plans are incorporated into the Operational section of the COEMP:

- Weed Management
- Feral Animal Management
- Erosion and Sediment Management
- Restrictions on Access
- Rehabilitation of Iron-Grass Natural Temperate Grassland (NTG) TEC

The COEMP also outlines roles and responsibilities, timing and performance criteria, monitoring, auditing and reporting, complaints and incident management, personnel training and induction, as well as a decommissioning and rehabilitation plan.

Refer to Attachment 3 for the *Willogoleche Wind Farm Construction and Operational Environmental Management Plan*.

As part of the COEMP monitoring and reporting requirements, data collection for the first annual Iron-Grass NTG monitoring event was undertaken in November 2017. Refer to Attachment 4 for the *Willogoleche Wind Farm Lomandra Grasslands Monitoring Report 2017*.

Administrative

- 5. Within 10 days after the commencement of the action, the person taking the action must advise the Department in writing of the actual start date of commencement.**

The action commenced on 4 September 2017. ENGIE advised the Department of the start date on 18 September 2017.

- 6. The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the 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.**

ENGIE maintains documents substantiating all activities associated with or relevant to the conditions of approval. These are available upon request from the Department.

- 7. Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. The report must remain on their website for a minimum of 12 months. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.**

The action commenced on 4 September 2017. Therefore the first 12 month anniversary is 4 September 2018. This compliance report (including attachments) is scheduled to be published on the Willogoleche Wind Farm website (<http://www.gdfsuezau.com/about-us/asset/Willogoleche-Wind-Farm>) prior to 3 December 2018.

- 8. If the person taking the action wishes to carry out any activity otherwise than in accordance with the plans as specified in conditions 3 and 4, the person taking the action must submit to the department for the Minister's written approval a revised version of that plan. The varied activity shall not commence until the Minister has approved the varied plan in writing. The Minister will not approve a varied plan unless the revised plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised plan, that plan must be implemented in place of the plan originally approved.**

No variations to activities listed in the plans specified in conditions 3 and 4 have been carried out or required. All activities have been in accordance with the plans. This condition has been acknowledged and noted by ENGIE Pty Ltd.

3 LIST OF ATTACHMENTS

Attachment 1. *Iron-Grass NTG of SA Impact Areas.*

Attachment 2. *Willogoleche Wind Farm Offset Management Plan (EBS Ecology 2017).*

Attachment 3. *Willogoleche Wind Farm Construction and Operational Environmental Management Plan (EBS Ecology 2017).*

Attachment 4. *Willogoleche Wind Farm Lomandra Grasslands Monitoring Report 2017 (EBS Ecology 2018).*



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