



Kahli Beissner

Environmental Audit Section
Office of Compliance
Department of Environment and Energy
GPO Box 787 Canberra ACT 2601

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Email: EPBCMonitoring@environment.gov.au

Dear Kahli,

Willogoleche Wind Farm, South Australia, (EPBC 2011/5850)

Annual Monitoring Report 2019

Please find attached Willogoleche Power's second annual compliance report addressing the requirements of its EPBC 2011/5850 approval conditions.

I trust this report meets the requirements of EPBC approval conditions. Please do not hesitate contacting me should you require any additional information on this report.

Yours sincerely,

Bahram Safai
Compliance and Renewables Manager South Australia
ENGIE ANZ

Australia

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Willogoleche Power Pty Ltd (ACN 112 307 589) as trustee for the Willogoleche
Operating Trust ABN 42 876 095 992
is part of a joint venture between ENGIE S.A. and Mitsui & Co., Ltd.

WILLOGOLECHE Power Pty Ltd AFT

EPBC DEVELOPMENT APPROVAL (EPBC 2011/5850)

Condition 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. As reported previously in the *Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2018*, approximately 0.7396 hectares (ha) 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.

No further clearance of *Iron-Grass Natural Temperate Grassland of South Australia* has occurred.

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 and reported previously in the *Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2018*, 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 *Iron-Grass Natural Temperate Grassland of South Australia* 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 and were maintained during construction works. As construction works have now been completed and no works are required within the buffer area, the signage and exclusion barriers have now been removed.

Condition 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 (HA) 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 2-3 years).

The Heritage Agreement was registered on 9 August 2019.

Condition 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

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).

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.

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

Data collection for the first round of annual monitoring within the Offset Area was undertaken on 8 October 2018, which fits within the timeframe for this annual compliance report (4 September 2017 to 3 September 2018). Refer to Attachment 3 for the *Offset Area Monitoring Report 2018* (EBS Ecology 2018).

Data collection for the second round of annual monitoring within the Offset Area was undertaken on 13 November 2019. However, since this is after the timeframe for this compliance report (4 September 2018 to 3 September 2019) the *Offset Area Monitoring Report 2019* will be submitted with the next annual compliance report

Condition 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 4 for the *Willogoleche Wind Farm Construction and Operational Environmental Management Plan*.

As part of the COEMP monitoring and reporting requirements, data collection for the second annual Iron-Grass NTG monitoring event was undertaken in November 2018. Refer to Attachment 5 for the *Willogoleche Wind Farm Lomandra Grasslands Monitoring Report 2018* (EBS Ecology 2019).

Condition 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.

Condition 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.

Condition 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. The first 12 month anniversary was 4 September 2018 and a compliance report was finalised on 20 November 2018 and uploaded to the Willogoleche Wind Farm website prior to 3 December 2018.

The second 12 month anniversary was 4 September 2019 and is the subject of this current EPBC Act compliance report, which 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 2019.

Condition 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.

ATTACHMENTS

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

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

Attachment 3. *Offset Area Monitoring Report 2018 (EBS Ecology 2018).*

Attachment 4. *Willogoleche Wind Farm Construction and Operational Environmental Management Plan (EBS Ecology 2017).*

Attachment 5. *Willogoleche Wind Farm Lomandra Grasslands Monitoring Report 2018 (EBS Ecology 2019).*



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