



Kahli Beissner

Environmental Audit Section
Office of Compliance
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Email: EPBCMonitoring@environment.gov.au

Dear Kahli,

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

Annual Monitoring Report 2021

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 Safa'i
SA Compliance and Renewables Manager
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.



GLOSSARY AND ABBREVIATION OF TERMS

COEMP	Construction and Operational Environmental Management Plan
Cth	Commonwealth
DEW	Department for Environment and Water (South Australian)
EBS	EBS Ecology
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
HA	Heritage Agreement
ha	hectare(s)
km	kilometre(s)
km ²	square kilometre(s)
m ²	square metre(s)
NTG	Natural Temperate Grassland
OEMP	Operational Environmental Management Plan
OMP	Offset Management Plan
TEC	Threatened Ecological Community



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.



INTRODUCTION

EBS Ecology was engaged by ENGIE to complete an annual compliance report for the Willogoleche Wind Farm project, which was granted approval on 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 fourth compliance report for the project and covers from 4 September 2020 to 3 September 2021. This compliance report (including attachments) will be published on the Willogoleche Wind Farm website (<https://engie.com.au/home/what-we-do/our-assets/wind/willogoleche/>) prior to 3 December 2021.

Project background

The Willogoleche Wind Farm is located approximately 6 kilometres (km) west of the township of Hallett, in the mid north of South Australia, approximately 160 km 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 119 megawatt wind farm consists of the following components:

- 32 wind turbine generators 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 action commenced on 4 September 2017. Facility completion of the wind farm was achieved on 12 November 2019. However, Willogoleche Wind Farm had been generating and exporting electricity to the grid a number of months prior to this date, during the commissioning and optimisation processes.



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 ha.

No further clearance of *Iron-Grass Natural Temperate Grassland of South Australia* (Iron-Grass NTG) 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 impacts on *Iron-Grass Natural Temperate Grassland of South Australia*.

In principle approval from the Native Vegetation Management Unit within 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 (unique identifier HA 1602).

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 Heritage Agreement was registered on 9 August 2019 (unique identifier HA 1602).

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).

A summary of annual monitoring within the Offset Area is provided in Table 1 below.

Table 1. Summary of annual monitoring within the Offset Area to date.

Annual monitoring round	Data collection date	Monitoring report	Annual compliance report Offset Area monitoring report attached to
First	8 October 2018	<i>Willogoleche Wind Farm Offset Area Monitoring Report 2018</i> (EBS Ecology 2018)	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2019</i> (4 September 2018 to 3 September 2019)
Second	13 November 2019	<i>Willogoleche Wind Farm Offset Area Monitoring Report 2019</i> (EBS Ecology 2020)	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2020</i> (4 September 2019 to 3 September 2020)
Third	18 November 2020	<i>Willogoleche Wind Farm Offset Area Monitoring Report 2020</i> (EBS Ecology 2021)	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report October 2021</i> (4 September 2020 to 3 September 2021)

Data collection for the first round of annual monitoring within the Offset Area was undertaken on 8 October 2018, which was within the timeframe for the 2019 annual compliance report (4 September 2018 to 3 September 2019) and provided as an attachment to the 2019 annual compliance report.

Data collection for the second round of annual monitoring within the Offset Area was undertaken on 13 November 2019, which fits within the timeframe for this annual compliance report (4 September 2019 to 3 September 2020) and provided as an attachment to the 2020 annual compliance report.

Data collection for the third round of annual monitoring within the Offset Area was undertaken on 18 November 2020, which fits within the timeframe for this annual compliance report (4 September 2020 to 3 September 2021). Refer to Attachment 3 for the *Willogoleche Wind Farm Offset Area Monitoring Report 2020* (EBS Ecology 2021).

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 was also provided as an attachment to both 2018 and 2019 annual compliance reports.

The COEMP was revised and updated to the *Willogoleche Wind Farm Operational Environmental Management Plan* (OEMP) on 18 October 2019, as construction works had been completed and management measures and actions associated with construction works were no longer relevant.

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

The following environmental sub plans are incorporated into the OEMP:

- Weed Management;
- Feral Animal Management;
- Erosion and Sedimentation Management;
- Fire Management;
- Access Management; and
- Iron-Grass NTG Management (including Rehabilitation of Iron-Grass NTG).

The OEMP 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 Operational Environmental Management Plan* (EBS Ecology 2019).

As part of the OEMP monitoring and reporting requirements, data collection for the fourth annual Iron-Grass NTG monitoring event was undertaken in November 2020. Refer to Attachment 5 for the *Willogoleche Wind Farm Lomandra Grassland Monitoring Report 2020* (EBS Ecology 2021).

A summary of annual Iron-Grass NTG monitoring undertaken to date is provided in **Error! Reference source not found.** below.

Table 2. Summary of annual Iron-Grass NTG monitoring undertaken to date.

Iron-Grass NTG annual monitoring round	Data collection dates	Monitoring report	EPBC Act annual compliance report the Iron-Grass NTG annual monitoring report is attached to
First (baseline)	13-15 November 2017	Willogoleche Wind Farm Lomandra Grassland Monitoring Report 2017 (EBS Ecology 2018)	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2018</i>
Second	13-14 November 2018	Willogoleche Wind Farm Lomandra Grassland Monitoring Report 2018 (EBS Ecology 2019)	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2019</i>
Third	11-13 November 2019	<i>Willogoleche Wind Farm Lomandra Grasslands Monitoring Report 2019 (EBS Ecology 2020)</i>	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2020</i>
Fourth	16-18 November 2020	<i>Willogoleche Wind Farm Lomandra Grassland Monitoring Report 2020 (EBS Ecology 2021)</i>	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report October 2021</i>

As outlined in **Error! Reference source not found.** above, the first annual Iron-Grass NTG monitoring event was undertaken in November 2017 and the associated monitoring report was provided with the 2018 EPBC Act annual compliance report, while the second annual Iron-Grass NTG monitoring event was undertaken in November 2018 and the associated monitoring report was provided with the 2019 EPBC Act annual compliance report, and the third annual Iron-Grass NTG monitoring event was undertaken in November 2019 and the associated monitoring report was provided with the 2020 EPBC Act annual compliance report.

The fourth annual Iron-Grass NTG monitoring event was undertaken in November 2020 and the associated monitoring report is provided with this 2021 EPBC Act annual compliance report as Attachment 5.

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. As such, action for this condition has been completed and this condition has been met.

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 a compliance report was finalised on 25 November 2019 and uploaded to the Willogoleche Wind Farm website prior to 3 December 2019.

The third 12-month anniversary was 4 September 2020 and a compliance report was finalised on 18 November 2020 and uploaded to the Willogoleche Wind Farm website prior to 3 December 2020.

The fourth 12-month anniversary is the subject of this current EPBC Act compliance report, which is scheduled to be published on the Willogoleche Wind Farm website (<https://engie.com.au/home/what-we-do/our-assets/wind/willogoleche/>) prior to 3 December 2021.

Compliance was met for all eight conditions of the approval.

A summary of EPBC Act annual compliance reporting for the Project is provided in Table 3.

Table 3. Summary of EPBC Act annual compliance reporting to date.

12-month anniversary of the commencement of the action	Anniversary date	Annual Compliance Report Title	Uploaded to the Willogoleche Wind Farm website
First 12-month anniversary	4 September 2018	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2018</i> (for 4 September 2017 to 3 September 2018)	Prior to 3 December 2018
Second 12-month anniversary	4 September 2019	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2019</i> (for 4 September 2018 to 3 September 2019)	Prior to 3 December 2019
Third 12-month anniversary	4 September 2020	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report November 2020</i> (for 4 September 2019 to 3 September 2020)	Prior to 3 December 2020.
Fourth 12-month anniversary	4 September 2021	<i>Willogoleche Wind Farm EPBC Act Annual Compliance Report October 2021</i> (for 4 September 2020 to 3 September 2021)	Proposed to be prior to 3 December 2021.

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. *Willogoleche Wind Farm Offset Area Monitoring Report 2020 (EBS Ecology 2021).*

Attachment 4. *Willogoleche Wind Farm Operational Environmental Management Plan (EBS Ecology 2019).*

Attachment 5. *Willogoleche Wind Farm Lomandra Grassland Monitoring Report 2020 (EBS Ecology 2021).*