

## Proponent Response to Audit Findings

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
C6 (c)	(c) incorporate a decision making framework that sets out specific actions and when they may be required to be implemented to reduce any impacts on bird and bat populations that have been identified as a result of the monitoring;	<p>Section 5 of the BBAMP outlines 'Impact triggers' and decision making framework which identifies the circumstances that result in notification, further investigation and additional mitigation for both threatened and non-threatened birds and bats ('impact triggers'). If an impact trigger is met, there must be an investigation into the cause of the impact, and whether the event was likely to be a one-off occurrence or a regular event. The decision making framework in the BBAMP outlines the steps to take for identifying and mitigating impact triggers.</p> <p>Multiple impact trigger events have occurred throughout implementation of the BBAMP, see Table 3-2 in Section 3.9 of this audit report, which have followed the decision making framework. Most of the events were determined to be a one-off occurrence unlikely to be significant at a regional population scale.</p> <p>During the 2021 Little-Red Flying Fox incident trigger mortality event, Biodiversity, Conservation &amp; Science (BCS) collaborated with Iberdrola and their consultants, Nature Advisory. Following the 2021 Little-Red Flying Fox incident trigger mortality event a lighting trial was undertaken at BWF, which was subject to a permit amendment prior to having permission to be implemented, with the aim of deterring LRFF from approaching turbines and reducing mortality. The concept involved lighting the base and surrounding hardstand of turbines with flood lights to see if LRFF flying through the wind farm would be deterred from the turbine. Unfortunately, the LRFF had vacated the region before the efficacy of the measure could be tested, however this is planned to be trialed again, much sooner, if the species returns.</p> <p>The final Little Red Flying Fox Impact Report that was produced can serve as a solid basis in implementing timely mitigation measures should a similar event occur in the future and illustrates that the BBAMP meets this condition.</p> <p>The third annual BBAMP (2022) states the following:  <i>BCS has requested the trigger point for investigation of Wedge-tailed Eagle (WTE) mortality at BWF be revised down to two carcasses found per year (BCS 2022). Which is to be implemented during the 2022/2023 monitoring period.</i></p> <p>The Fifth annual BBAMP report (November 2024) recorded two WTE eagle mortalities in October and November 2023 which were <b>not recorded as an impact trigger</b>, as per the agreement mentioned in the third annual report. Page 24 of the Fifth annual report also incorrectly reports past WTE mortality at BWF, as there were actually 8 casualties recorded in Year 2 (not 3).</p> <p>The Fifth annual report also states that '<i>WTE mortality to be documented photographically to ensure the age estimate can be recorded, and to be reported to BCS as soon as possible within 5 business days of species identification</i>' – it is unclear if this occurred for the two WTE mortalities detected in 2023.</p> <p>The BBAMP is considered compliant with incorporating a decision making framework. However, the WTE trigger in 2023 needs to be enacted and page 24 of the fifth annual report needs to be updated.</p>	<p><b>Considered compliant</b></p> <p><b>Recommendation:</b></p> <p>Two Wedge-tailed mortalities in October and November 2023 should be recorded as a non-threatened species impact trigger. Page 24 of the Fifth annual report, Wedge-tailed eagle mortality in Year 2, should be corrected.</p>	<p><b>Proposed Action</b></p> <p>Revise BBAMP 5<sup>th</sup> Annual Report to reflect data. Consult with BCS to advise omission.</p>	31 <sup>st</sup> May 2025

C6 (f)	(f) identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the application of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success.	<p>The BBAMP Section 3.5 outlines 'Routine reporting and Review Meetings requirements':</p> <p><i>Reports will be submitted to the Secretary and OEH as per the project approval conditions. Matters to be addressed in the report include, but will not be limited to:</i></p> <ul style="list-style-type: none"> <li><i>A description of the BBAMP activities undertaken during the reporting year;</i></li> <li><i>A summary of the search methodologies and searches undertaken</i></li> <li><i>Details and results of the carcass searches</i></li> <li><i>Observation from the Superb Parrot surveys</i></li> <li><i>Observation from the Babbler monitoring and</i></li> <li><i>Any identified impact triggers and/or recommended updates to the BBAMP risk assessment</i></li> <li><i>Any recommended changes to survey effort based on the results of the surveys.</i></li> </ul> <p><i>At the end of the second year of post-construction monitoring, an overall assessment will be made of all the data obtained during the first two years of BBAMP implementation, details of the management practices implemented, as well as recommended adjustments. The results of the review and its implications will be discussed with OEH.</i></p> <p><i>Annual reports prepared for years beyond the first two years will include the results of any monitoring activities undertaken for that year and a discussion regarding any impact triggers or unacceptable impacts identified, mitigation measures implemented and application of the decision making framework.</i></p> <p>The second annual BBAMP report (2021) addressed all the points mentioned above and concluded:</p> <p><i>Two years of mortality search data have provided a useful baseline set of data to gain an understanding of the impact that the wind farm is having on bird and bat species in the region. Extension of the formal carcass monitoring program is not recommended.</i></p> <p><i>In-depth research and discussion with BWF and BCD regarding new potential mitigation measures would be required to understand how any such further measure might apply in modern Australian wind farm settings and whether these would be viable.</i></p> <p>Mitigation measures are addressed in periodic reports. The final Little Red Flying Fox Impact Report that was produced sets an example of implementing timely mitigation measures should a similar event occur in the future and illustrates that the BBAMP meets this condition.</p> <p>The third annual BBAMP (2022) states the following:</p> <p><i>Consultations between BCS, BWF and Nature Advisory since the second annual report have resulted in the decision to implement a third year of carcass monitoring, using a scent detection dog. A new program of carcass monitoring was be implemented, targeting detection of small (i.e. microbat) carcasses as well as collecting further details on Wedge-tailed Eagle mortalities over time. This will consist of monthly searches out to 60 m to target small carcasses) and searches every 4 months out to 100 m (to detect WTE) using the scent detection dog (Nature Advisory 2022a, BCS 2022). The results of this monitoring will inform the need for further monitoring to understand patterns of bird and bat mortality at BWF over time.</i></p> <p>This monitoring program occurred January 2023 to December 2023.</p> <p>The third BBAMP report also stated:</p> <p><i>BCS has requested the trigger point for investigation of Wedge-tailed Eagle (WTE) mortality at BWF be revised down to two carcasses found per year (BCS 2022). Which is to implemented during the next 2022/2023 monitoring period. It is further suggested that continued effort is made to remove prey items of WTE from close proximity of operating turbines. This includes rabbits and their warrens, and any dead sheep or kangaroo carcasses within this distance (discussed further in Section 5).</i></p>	<p><b>Considered compliant</b></p> <p><b>Recommendation:</b></p> <p>It is recommended that Iberdrola, in consultation with BCS, review the BBAMP moving forward to ensure the future objectives of the plan are Specific, Measurable, Achievable, Relevant and Time bound (SMART).</p>	<p><b>Proposed Action</b></p> <p>Consult with BCS to review BBAMP to ensure the plan is as per recommendation.</p>	31 <sup>st</sup> May 2025

		<p>Wind farm personnel should continue to record any carcasses identified due to incidental finds at BWF as per the incidental carcass finds process.</p> <p>The fifth annual BBAMP report (November 2024) recorded two WTE eagle mortalities in October and November 2023 which were <b>not recorded as an impact trigger</b>, as per the agreement mentioned in the third annual report. Page 24 of the fifth annual report also incorrectly reports past WTE mortality at BWF, as there were actually 8 casualties recorded in Year 2 (not 3).</p> <p>As per its' title, the BWF BBAMP is an 'adaptive' program, section 3.5 states:  <i>As this management plan is adaptive, further refinements to the program will be included in periodic reports following the second year of post-construction monitoring and will be based on the outcomes of monitoring surveys and report and impacts'</i></p> <p>BWF continues to take on feedback from BCS/CPHR about the BBAMP.  Correspondence from CPHR dated 20/02/2025 regarding the Fifth Annual BBAMP Report was sighted which stated:  <i>We have reviewed the revised report and note that revisions to the plan have been made that address comments made in our correspondence dated 14 October 2024.</i>  <i>CPHR is satisfied that the Fifth Annual BBAMP fulfills the requirements of the BBAMP.</i></p> <p>The BBAMP is considered compliant with identifying matters to be addressed in periodic reports and has demonstrated that progress with mitigation is possible.</p> <p><b>Recommendation:</b>  <b>Following three years of intensive monthly mortality detection and 'at risk' species monitoring, combined with 5 years of incidental carcass finds, the main risks to bird and bats by BWF have been identified – raptors, particularly Wedge-tailed eagles and bats</b></p>			
D4	<p>Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the Project, for the life of the Project. The Proponent shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to:</p> <p>(a) information on the current implementation status of the Project;  (b) a copy of the documents referred to under condition B1 of this Approval, and any documentation supporting modifications to this Approval that may be granted;  (c) a copy of this Approval and any future modification to this Approval;  (d) a copy of each relevant environmental approval / consent, licence or permit required and obtained in relation to the Project;  (e) a copy of each current strategy, plan, program or other document required under this Approval;  (f) the outcomes of compliance tracking in accordance with condition D5 of this Approval; and  (g) details of contact point(s) to which community complaints and enquiries may be directed, including a telephone number, a postal address and an email address.</p>	<p>The Bodangora Wind Farm website is active and can be readily accessed:  <a href="https://www.iberdrola.com.au/our-assets/operating-renewable-energy-assets/bodangora">https://www.iberdrola.com.au/our-assets/operating-renewable-energy-assets/bodangora</a></p> <p>Project approval and modifications documents are not available directly on the Bodangora Wind Farm website, but a link is available which connects directly to the approval documents on the NSW Planning Portal.</p> <p>EPL license needs old version (2019) removed from website (new 2020 version is already available)</p> <p>Considered compliant</p> <p>Recommendation:</p> <p>Some documents are overdue for annual review:</p> <ul style="list-style-type: none"> <li>• Compliance Tracking Program overdue for annual review</li> <li>• Pollution Incident Response Management Plan overdue for annual review</li> </ul> <p>(also update Table 3.3 re: completion of 2018 audit, and page 10 change reference from CEMP to OEMP)</p> <ul style="list-style-type: none"> <li>• OEMP overdue for annual review</li> </ul> <p>Noting that this is the proponent's internal requirement, and the annual reviews need to occur for the documents to be consistent with themselves. BWF Owners Representative reports the annual reviews are currently going through the internal review process. Consider revising internal review process to occur in a timelier fashion or reassess review timetable.</p>	<p><b>Considered compliant</b></p> <p><b>Recommendation:</b></p> <p>Updates documents overdue for annual review.  Consider revising internal review process to occur in a timelier fashion or reassess review timetable.</p>	<p><b>Proposed Action</b></p> <p>Remove 2019 EPL from website.</p> <p>Finalise Annual review of Compliance Tracking Program. Update website with latest revision and provide copy to DPI.</p> <p>Finalise Annual review of PIRMP including update to Table 3.3. Update website with latest revision and provide copy to DPI.</p> <p>Finalise Annual review of OEMP. Update website with latest revision and provide copy to DPI.</p>	31 <sup>st</sup> May 2025