

White Rock Wind Farm

Compliance Tracking Program



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For: White Rock Wind Farm Pty Ltd (WRWFPL)



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1 INTRODUCTION

1.1 Purpose of this document

This document describes the Compliance Tracking Program implemented for the White Rock Wind Farm (WRWF), in particular in relation to the Stage 1 development (as described in the WRWF Staging Report). It addresses the requirements of Condition D5 of the Project Approval MP10_160. The report has been prepared by Goldwind Australia Pty Ltd (GWA) on behalf of White Rock Wind Farm Pty Ltd (WRWFPL).

1.2 Project Background

The proposed White Rock Wind Farm (WRWF) received planning approval on 10 July 2012, from the NSW Minister for Planning under Section 75J of the Environmental Planning and Assessment (EP&A) Act, 1979. The Project Approval was subsequently modified under Section 75W, on 24 July 2015 (MP10_160 MOD 2).

The approval allows for construction of up to 119 wind turbines and associated infrastructure including a substation and 132kV transmission line to connect to TransGrid's existing 132kV Glen Innes to Inverell transmission line. White Rock Wind Farm is located between Glen Innes and Inverell and about 75 km north of Armidale. It is wholly on privately owned rural land along the Great Dividing Range.

Goldwind Capital Australia (GWCA) has acquired WRWFPL and the project from Epuron Pty Ltd which obtained the planning approval. Goldwind Australia (GWA) now aims to complete preconstruction planning activities, on behalf of GWCA, to position the project such that construction can commence from January 2016.

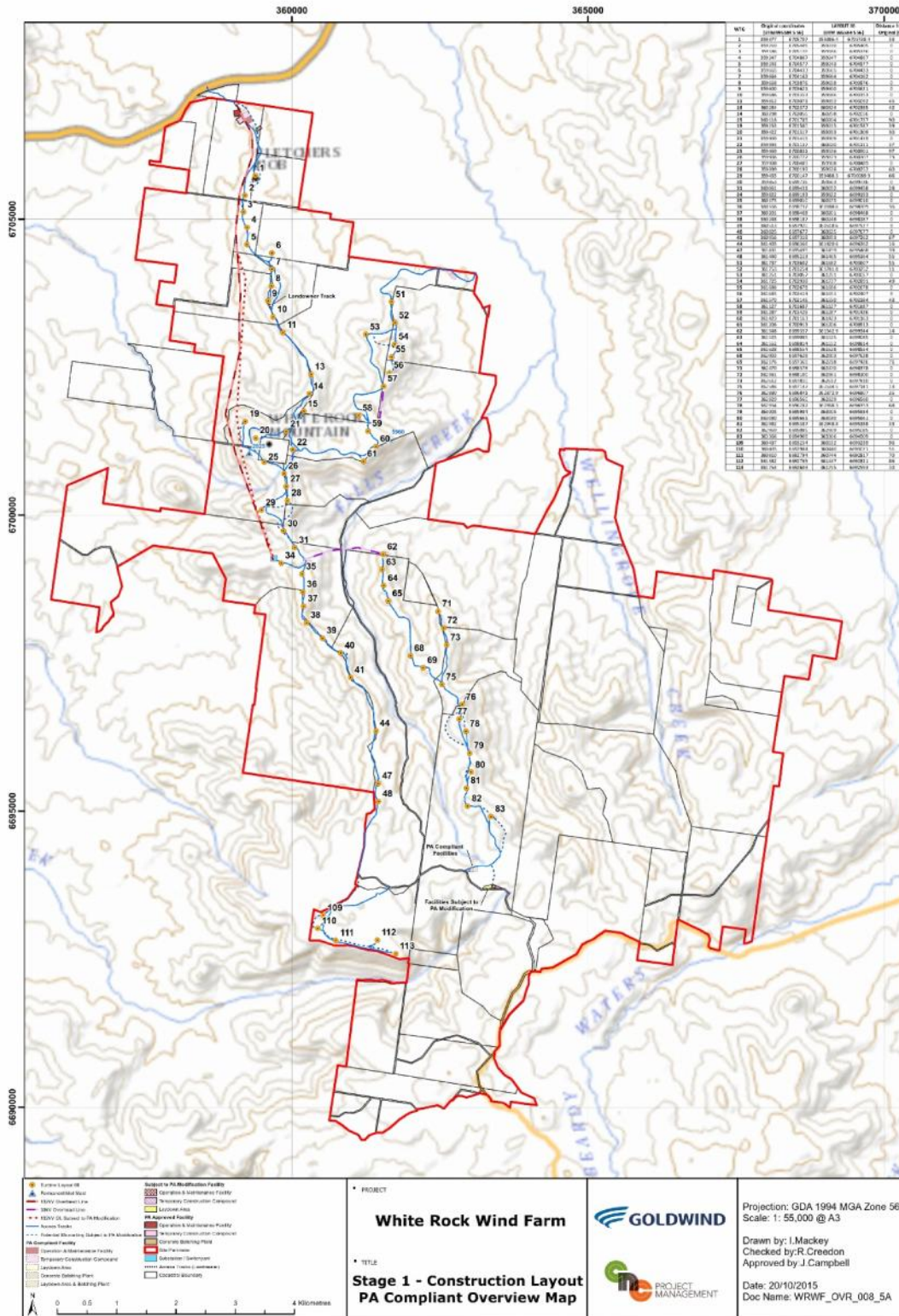
While the Project Approval allows for up to 119 wind turbines to be installed, it is intended that the project will be developed in stages. The first stage of the project will involve the installation of up to 70 wind turbines.

Ultimately the development, through a further stage of construction could include all 119 turbine sites. The staging report required by Condition B11 of the Project Approval that is separately submitted to Department of Planning and Environment (DPE) describes proposed staging of the project implementation.

Goldwind Australia (GWA) is undertaking the pre-construction planning for the project implementation and is addressing compliance obligations in respect of the WRWF Project Approval.

The project locality and general layout are shown in Figure 1.1 *White Rock Wind Farm Site Locality and Project Area Plan*

Figure 1.1 Locality map for the proposed White Rock Wind Farm



2 PROJECT APPROVAL CONDITIONS AND COMPLIANCE TRACKING REQUIREMENTS

The Project Approval (July 2012), as modified on 24 July 2015, includes Conditions grouped in Schedules A to G, as listed below. A number of the original conditions were deleted or modified by DPE in July 2015 for the reasons described in the DPE Assessment Report for the modification (MOD 2).

Table 1.1 – Structure of Project Approval Conditions

Part	From	To	Conditions
Schedule A	NA	NA	Land description and Project Items
	NA	NA	Definitions
Schedule B	B1	B15	Administrative Conditions
Schedule C	C1	C34	Environmental Performance
Schedule D	D1	D08	Community Information Reporting & Auditing
Schedule E	E1	E22	Construction Environmental Management
Schedule F	F1	F20	Operational Environmental Management
Schedule G	G1	G12	Additional Procedures
Appendix 1	1	2	1 - Project Layout
	Map	Table	2 - Schedule of Land
Appendix 2	(a)	(f)	Background Noise Survey and Verification Report
Appendix 3	Part A	Part B	Noise Compliance Assessment
			Part A <ul style="list-style-type: none"> • Tonality • Low Frequency Noise Part B <ol style="list-style-type: none"> 1. Applicable meteorological conditions – wind turbines 2. Applicable meteorological conditions – Other facilities

Schedule D, Condition D5 requires the proponent to develop and implement a **Compliance Tracking Program** as follows:

*The Proponent shall develop and implement a **Compliance Tracking Program** to track compliance with the requirements of this approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the life of the project. The Program shall include, but not necessarily be limited to:*

- (a) *provisions for the notification of the Secretary prior to the commencement of construction and prior to the commencement of operation of the project (including prior to each stage, where works are being staged);*
- (b) *provisions for periodic review of the compliance status of the project against the requirements of this approval;*
- (c) *provisions for periodic reporting of compliance status to the Secretary, including*
 - *a Pre-Construction Compliance Report,*
 - *during construction reporting, and*
 - *a Pre-Operation Compliance Report;*
- (d) *a program for independent environmental auditing in accordance with ISO 19011:2003 – Guidelines for Quality and/ or Environmental Management Systems Auditing;*
- (e) *mechanisms for recording environmental incidents during construction and actions taken in response to those incidents;*
- (f) *provisions for reporting environmental incidents to the Secretary and relevant public authorities during construction;*
- (g) *procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management; and*
- (h) *provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.*

This report documents the proponent's Compliance Tracking Program for WRWF development.

3 OVERVIEW OF THE COMPLIANCE TRACKING PROGRAM

GWA has prepared the Compliance Tracking Program on behalf of White Rock Wind Farm Pty Ltd (WRWFPL) to outline the system for addressing requirements of Project Approval Condition D5 (see above). Requirements of Condition D5 and associated D6 and D7 are addressed via the following:

3.1 Notification and Reporting to the Secretary for construction phase

The Project Manager will ensure that notification and reporting as indicated below is provided to DPE.

- Notification prior to the commencement of construction (each stage, where works are staged)
- Pre-construction compliance reporting (each stage, where works are staged)
- During construction compliance reporting (quarterly as a minimum)

The notification of commencement of construction will be made to the Secretary, DPE, at least 2 weeks prior to construction commencing. The proponent's Pre-Construction Compliance Report will be provided to DPE at least one month prior to the full commencement of the construction works.

During pre-construction planning, WRWFPL has met with DPE on a number of occasions to discuss the WRWF planning status, the pre-construction approvals process and issues arising for review of plans and implementation timeframe.

The approved ER has been engaged by WRWFPL and undertakes reviews of the project compliance with the Project Approval, effectiveness of management measures and where necessary advises improvements to achieve performance objectives. The ER has reviewed the pre-construction plans required by the Project Approval prior to their submission to DPE.

During construction, WRWFPL will provide periodic summary reports on compliance status, to the Secretary, at intervals of not more than 3 months. The approved ER will also undertake regular reviews of project performance and compliance with the Project Approval.

3.2 Recording and reporting construction environmental incidents

The WRWF Stage 1 CEMP sets out the process for recording and reporting environmental incidents during the Stage 1 construction activities. Condition D6 sets out requirements for Incident Reporting

Condition D6: *The Proponent shall notify the Secretary within 24 hours of becoming aware of any incident with actual or potential significant off-site impacts on people or the biophysical environment. Further, the Proponent shall provide full written details of the incident to the Secretary within seven days of the date on which the incident occurred.*

Where the proponent becomes aware of any incident, with actual or potential significant off-site impacts on people or the biophysical environment then the Proponent shall:

- Notify the Secretary of the incident within 24 hours of becoming aware of the incident;
- Record details of the incident, reasons for the incident, controls applied, outcomes of the incident investigation. The Incident Response process is described in the WRWF CEMP;
- If necessary, arrange further investigation of the causes and/or impacts;
- Provide full written details of the incident to the Secretary within seven days; and
- Follow up the incident to ensure effective response and where necessary strengthening of procedures and/or system to avoid recurrence

3.3 Notification prior to the commencement of operation of the project or each stage.

The following notifications are proposed for operations phase of WRWF.

- The proponent shall notify the Secretary of the commencement of the Operation of the Project;
- The notification will be accompanied by a Pre-Operations Compliance Report; and
- An Operation Environmental Management Plan will be submitted at least one month prior to the commencement of Operations.

Annual reviews of operational compliance will be undertaken and a summary report provided to the Secretary.

3.4 Procedures for rectifying any identified non-compliance

The WRWF CEMP sets out the process for rectifying any non-compliance during construction whether identified from auditing, compliance reviews or incident management processes. The process aims to make good any adverse impacts and to ensure that measures are integrated in the project management to avoid or mitigate potential for recurrence.

Condition D7 (shown below) also includes requirements for addressing the cause(s) or impacts of any incident as they relate to the approval and reported in accordance with Condition D6.

Condition D7 *The Proponent shall meet the requirements of the Secretary to address the cause(s) or impacts of any incident, as they relate to this approval, reported in accordance with condition D6 of this approval, within such period as the Secretary may require.*

The proponent will comply with the requirements of the Secretary in the specified timeframe. The proponent will thoroughly investigate all incidents arising from the project to identify causes, potential for recurrence and as necessary, any improvements in controls to avoid recurrence.

3.5 A program of independent environmental auditing in accordance with ISO 19011:2003

WRWFPL will implement a program of environmental audits commencing during construction and continuing through operation and decommissioning to cover the full life of the project.

The audit program will include internal and external audits as described in Table 3.1 below and the following sections. The scope of the audit will vary during the course of the project but generally address the objectives shown in Table 3.1.

Table 3.1 – Environmental Audit Program

Timing	Internal/ External	Objective
Stage 1 - Construction phase – Period of up to 24 months prior to commencement of operation		
1 month after start of construction	Internal	Establish that all management controls are being implemented and compliance and environmental performance objectives achieved.
4 months after start of construction	Internal	Establish that all management controls are being implemented and compliance and environmental performance objectives achieved. Ensure any prior non-conformance addressed.
6 months after start of construction	External	Independent review of site practices and performance to ensure compliance and achievement of performance objectives.
7 months after start of construction	Internal	Ensure adequate response to external audit and any non-conformance addressed
10 months after start of construction	Internal	Establish that all management controls are being implemented and construction activities are compliant and environmental performance objectives achieved. Ensure any prior non-conformance addressed.
14 months	Internal	
18 months	External	
21 months	Internal	Review commissioning and rehabilitation activities as they are required.
Operations phase – Commences when all turbines and substation installed – Wind Farm operating		
1 months after Operations commencement	Internal	Audit Construction completion and initial Operations and Maintenance activities, Compliance with OEMP and EPA Licence.
6 months after Operations commencement	Internal	Ensure that post construction site rehabilitation has been adequately addressed. Audit compliance of operations and whether environmental objectives are being achieved.
12 months after Operations commencement and	External	Full external/independent audit of first 12 months of operation. Audit against Project Approval, EPA Licence and OEMP.

thereafter every 2 years		The audit will address the requirements of Project Approval Condition D8.
24 months after Operations commencement and thereafter every 12 months	Internal	Internal audit of second 12 months of operation. Audit against Project Approval, EPA Licence and OEMP. Align timing with EPA Licence Annual Return
Decommissioning and Site Rehabilitation		
On completion of decommissioning	External	Full external/independent audit against Project Approval, EPA Licence and Decommissioning and Rehabilitation Plan.

3.5.1 Internal audits

The Development Compliance Manager will conduct, or arrange for an experienced person to conduct internal audits of the project environmental performance. During construction, these internal audits will occur every 3 to 4 months except where an external audit is scheduled within approximate time that the internal audit would occur. The first internal audit will occur 1 month after site works commence. The scope of the internal audits will focus on compliance with the project approval and EPA Licence and the effectiveness of the CEMP implementation including sub-plans and performance outcomes. The purpose of internal audits is to ensure:

- effective implementation of the CEMP including completion of all environmental schedules by site based environmental officers and maintenance of relevant site records and demonstration that corrective action and follow-up occurs for non-conformances;
- relevance of the environmental controls and procedures contained within the CEMP;
- to identify any need to improve the controls and procedures contained within the CEMP to ensure compliance or improve performance;
- to review compliance with EPA Licence; and
- to ensure that WRWFPL and agency and community stakeholders can have confidence in the responsible implementation of the White Rock Wind Farm.

These internal audits will transition from construction issues to operation issues after 24 months but will review that construction and rehabilitation requirements have been closed out. Internal audits of operations will occur every 12 months.

3.5.2 External Independent Audits

In addition to the internal audits, the Development Compliance Manager will also arrange external independent audits, as required under MCoA D5 (d). These will be undertaken by appropriately experienced and qualified persons independent of the project. During construction, the external audits will occur every 12 months commencing 6 months from commencement of site works. The purpose of the independent audit is to confirm the adequacy of the project environmental management system including compliance with Project Approval Conditions, CEMP requirements and EPL 20665 and performance outcomes. It will focus on outcomes over the 12 month period, areas of any non-conformance, incidents, complaints and the project corrective actions to reduce risks and

improve performance. The external independent audits will be undertaken in accordance with ISO 19011:2003 Guidelines for Quality and/or Environmental Management Systems Auditing.

During operations, external audits will be undertaken every 2 years, with the first audit occurring 1 year after the commencement of operations.

3.6 Provisions for ensuring awareness and compliance with the conditions of this approval

The CEMP sets out the processes for ensuring all employees, contractors and sub-contractors are aware of:

- Project approval conditions and compliance requirements;
- Relevant environmental risks;
- Relevant procedures and controls to mitigate environmental risks; and
- Monitoring and reporting requirements.

The Operational Environmental Management Plan will set these requirements for the Operations phase of the project.

3.7 Compliance Tracking Matrix

Attachment 1 provides the Compliance Tracking Matrix updated as at 06 November 2015. Once construction commences, the matrix will be reviewed and updated on a monthly basis. The matrix provides details of the status of compliance with each of the Project Approval Conditions and the details of the actions completed or in progress.

Updates of the matrix will be reviewed at intervals of not greater than one month for construction or every 3 months for operation and, as necessary, updated.

Copies of the Compliance Tracking Matrix will be provided to the ER on a regular basis to assist their review of compliance matters.

Attachment 1 – Compliance Tracking Matrix

The Tables in Attachment 1 provide the status of compliance with the Conditions of Project Approval.