

## 15. Statement of Commitments

This chapter of the EA states the commitments made by Renewable Power Ventures (RPV) to be integrated in the project.

**Table 15.1 – Statement of Commitments**

| Issue<br>or Section No.   | Commitment  |
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| Administrative<br>Condition -<br>Compliance                               | <p>RPV will notify in writing the Director-General, Relevant Government Departments and Palerang Council of the start of the Project's Construction and Operation. Such notification must be provided at least four weeks before the relevant start date unless otherwise agreed to by the Director-General.</p> <p>RPV will bring to the Director-General's attention any matter that may require further assessment by the Director-General.</p> <p>RPV will comply with any requirements of the Director-General arising from the Director-General's assessment of:</p> <p>(a) any reports, plans or correspondence that are submitted to satisfy the Conditions of Approval; and</p> <p>(b) the implementation of any actions or measures contained in such reports, plans or correspondence.</p> |
| Administrative<br>Condition – Pre<br>Construction<br>Compliance<br>Report | <p>RPV will submit a Pre-Construction Compliance Report to the Director-General at least two weeks before Construction commences (or within any other time agreed to by the Director-General).</p> <p>The Pre-Construction Compliance Report will include:</p> <p>(a) details of how the Conditions of Approval required to be addressed before Construction were complied with;</p> <p>(b) the time when each relevant Condition of Approval was complied with, including dates of submission of any required reports and/or approval dates; and</p> <p>(c) details of any approvals or licences required to be issued by Relevant Government Departments before Construction commences.</p>   |
| Administrative<br>Condition – Pre<br>Operation<br>Compliance<br>Report    | <p>RPV will submit a Pre-Operation Compliance Report to the Director-General at least two weeks before Operation commences (or within any other time agreed to by the Director-General).</p> <p>The Pre-Operation Compliance Report must include:</p> <p>(a) details of how the Conditions of Approval required to be addressed before Operation were complied with;</p> <p>(b) the time when each relevant Condition of Approval was complied with, including dates of submission of any required reports and/or approval dates; and</p> <p>(c) details of any approvals or licences issued by Relevant Government Departments for the Project's Operation.</p>  |

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| Administrative Condition – Construction Compliance Reports                    | <p>RPV will provide the Director-General, Palerang Council and any other government department nominated by the Director-General with Construction Compliance Reports. The environmental management representative (EMR) must review the Construction Compliance Reports before they are submitted to the Director-General and bring to the Director-General's attention any shortcomings.</p> <p>The first Construction Compliance Report will report on the first six months of Construction and be submitted a maximum six weeks after expiry of that period (or at any other time interval agreed to by the Director General). The second, and subsequent, Construction Compliance Reports will be submitted at maximum intervals of six months from the date of submission of the first Construction Compliance Report (or at any other time interval agreed to by the Director General) for the duration of Construction.</p> <p>The Construction Compliance Reports will include information on:</p> <ul style="list-style-type: none"> <li>(a) compliance with the CEMP and the Conditions of Approval;</li> <li>(b) compliance with any approvals or licences issued by Relevant Government Departments for Construction;</li> <li>(c) the implementation and effectiveness of environmental controls. The assessment of effectiveness will be based on a comparison of actual impacts against performance criteria identified in the CEMP;</li> <li>(d) environmental monitoring results, presented as a results summary and analysis;</li> <li>(e) the number and details of any complaints, including a summary of main areas of complaint, action taken, response given and intended strategies to reduce recurring complaints;</li> <li>(f) details of any review and amendments to the CEMP resulting from Construction during the reporting period; and</li> <li>(g) any other matter relating to compliance with the Conditions of Approval or as requested by the Director-General.</li> </ul> <p>The Construction Compliance Reports will be made publicly available.</p> |
| Environmental Impact Audits- Environmental Impact Audit Report - Construction | <p>An Environmental Impact Audit Report - Construction will be prepared by RPV and submitted to the Director-General a maximum three months after Construction is complete (or at any other time interval agreed to by the Director-General). The Environmental Impact Audit Report – Construction will also be submitted to other government departments upon the request of the Director-General.</p> <p>The Environmental Impact Audit Report – Construction will:</p> <ul style="list-style-type: none"> <li>(a) identify the major environmental controls used during Construction and assess their effectiveness;</li> <li>(b) summarise the main environmental management plans and processes implemented during Construction and assess their effectiveness;</li> <li>(c) identify any innovations in Construction methodology used to improve environmental management; and</li> <li>(d) discuss the lessons learnt during Construction, including recommendations for future Projects.</li> </ul>  |

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| Environmental Impact Audits-<br>Environmental Impact Audit Report - Operation | <p>An Environmental Impact Audit Report - Operation will be submitted by RPV to the Director-General a maximum 24 months after the Project begins Operation and at any additional periods that the Director-General may require. The Environmental Impact Audit Report - Operation must also be submitted to other government departments upon the request of the Director-General.</p> <p>The Environmental Impact Audit Report - Operation will:</p> <ul style="list-style-type: none"> <li>(a) be certified by an independent person at the Proponent's expense. The certifier must be advised to the Director-General before the Environmental Impact Audit Report – Operation is prepared;</li> <li>(b) compare the Operation impact predictions made in the EA, Submissions Report and any supplementary studies with the actual impacts;</li> <li>(c) assess the effectiveness of implemented mitigation measures and safeguards;</li> <li>(d) assess compliance with the systems for operation maintenance and monitoring;</li> <li>(e) discuss the results of consultation with the local community particularly any feedback or complaints; and</li> <li>(f) be made publicly available.</li> </ul> |
| Environmental Management –<br>Construction Environmental Management Plan      | <p>A Construction Environmental Management Plan (CEMP) will be prepared by RPV and implemented in accordance with all relevant Acts and Regulations. RPV will obtain the Director-General's Approval for the CEMP before Construction commences or within any other time agreed to by the Director-General. The CEMP must be reviewed by the EMR before RPV seeks the Director-General's approval for the CEMP. The EMR must bring to the Director-General's attention any shortcomings.</p> <p>RPV will ensure that the mitigation measures identified in this EA are incorporated into the CEMP or the relevant Sub Plan.</p> <p>The CEMP will be prepared in accordance with the Department's publication entitled Guideline for the Preparation of Environmental Management Plans (2004).</p>   |
| Environmental Management –<br>Operation Environmental Management Plan         | <p>An Operation Environmental Management Plan (OEMP) will be prepared by RPV and implemented in accordance with these Conditions and all relevant Acts and Regulations. RPV will obtain the approval of the Director-General for the OEMP before Operation commences or within any other time agreed to by the Director-General.</p> <p>RPV will ensure that the mitigation measures identified in this EA are incorporated into the OEMP or the relevant Sub Plan.</p> <p>The OEMP must be prepared in accordance with the Department's publication entitled Guideline for the Preparation of Environmental Management Plans (2004).</p>   |

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| Environmental Management – Environmental Management Representative | <p>RPV will request the Director-General's Approval for the appointment of an Environmental Management Representative (EMR) at least eight weeks before Construction commences (or within any other time agreed to by the Director-General). In its request RPV will provide the following information, the:</p> <p>(a) qualifications and experience of the EMR including demonstration of general compliance with relevant Australian Standards for environmental auditors;<br/> (b) authority and independence (from the Proponent or its contractors) of the EMR including details of the Proponent's internal reporting structure; and<br/> (c) resourcing of the EMR role. The EMR will be available:</p> <p style="padding-left: 40px;">i for sufficient time to undertake the EMR role. This timing shall be agreed between RPV and the EMR and advised to the Director-General in the request for approval;<br/> ii at any other time requested by the Director-General;<br/> iii during any Construction activities identified in the CEMP to require the EMR's attendance; and<br/> iv for the duration of Construction.</p> <p>The Director-General may at any time immediately revoke the approval of an EMR appointment by providing written notice to RPV. Interim arrangements for EMR responsibility following the revocation must be agreed in writing between the Director-General and RPV.</p> <p>The Director-General may at any time conduct an audit of any actions undertaken by the EMR.</p> <p>RPV will:</p> <p>(a) facilitate and assist the Director-General in any such audit; and<br/> (b) include in the conditions of the EMR's appointment the need to facilitate and assist the Director-General in any such audit.</p> <p>The EMR is authorised to:</p> <p>(a) consider and advise the Director-General and RPV on matters specified in the Conditions of Approval and compliance with such;<br/> (b) determine whether work falls within the definition of Construction where clarification is requested by RPV;<br/> (c) review the CEMP;<br/> (d) periodically monitor RPV's activities to evaluate compliance with the CEMP. Periodic monitoring must involve site inspections of active work sites at least fortnightly;<br/> (e) provide a written report to RPV of any non-compliance with the CEMP observed or identified by the EMR. Non compliance must be managed as identified in the CEMP;</p> |

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|   | <p>(f) issue a recommendation to RPV to stop work immediately if in the view of the EMR an unacceptable impact on the environment is occurring or is likely to occur. The stop work recommendation may be limited to specific activities causing an impact if the EMR can easily identify those activities. The EMR may also recommend that RPV initiate reasonable actions to avoid or minimise adverse impacts;</p> <p>(g) review corrective and preventative actions to monitor the implementation of recommendations made from audits and site inspections;</p> <p>(h) certify that minor revisions to the CEMP are consistent with the approved CEMP; and</p> <p>(i) provide regular (as agreed with the Director-General) reports to the Director-General on matters relevant to carrying out the EMR role including notifying the Director-General of any stop work recommendations.</p> <p>The EMR must immediately advise RPV and the Director-General of any incidents relevant to these Conditions resulting from Construction that were not dealt with expediently or adequately by RPV.</p> |
| Community and Consultation - Advice of Construction Activities        | <p>RPV will ensure that the local community and businesses are advised of Construction activities that could cause disruption. Methods to disseminate this information will be identified in the CEMP. Information to be provided will include:</p> <p>(a) details of any traffic disruptions and controls;</p> <p>(b) construction of temporary detours; and</p> <p>(c) work approved to be undertaken outside standard Construction hours, in particular noisy works, before such works are undertaken.</p>  |
| Community and Consultation – Establishment of a Project Internet Site | <p>RPV will establish a Project internet site before Construction commences and maintain the internet site until Construction ends. This internet site will contain:</p> <p>(a) periodic updates of work progress, consultation activities and planned work schedules. The site will indicate the date of the last update and the frequency of the internet site updates;</p> <p>(b) a description of relevant approval authorities and their areas of responsibility;</p> <p>(c) a list of project reports and plans that are publicly available and details of how these can be accessed;</p> <p>(d) contact names and phone numbers of relevant communications staff; and</p> <p>(e) the 24 hour toll-free complaints contact telephone number.</p> <p>Updates of work progress, construction activities and planned work schedules will be provided where significant changes in noise or traffic impacts are expected.</p>  |

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| Community and Consultation –<br>Complaints Management | <p>Prior to the commencement of Construction, RPV will ensure that the following is available for the construction and operation period:</p> <ul style="list-style-type: none"> <li>(a) a postal address to which written complaints may be sent;</li> <li>(b) an e-mail address to which electronic complaints may be transmitted;</li> <li>and</li> <li>(c) a 24-hour telephone contact line.</li> </ul> <p>RPV will keep a legible record of all complaints received in an up-to-date Complaints Register. The Complaints Register will record, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) the date and time, where relevant, of the complaint;</li> <li>(b) the means by which the complaint was made (telephone, mail or e-mail);</li> <li>(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</li> <li>(d) the nature of the complaint;</li> <li>(e) any action(s) taken by RPV in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>(f) if no action was taken by RPV in relation to the complaint, the reason(s) why no action was taken.</li> </ul> <p>The Complaints Register will be made available for inspection on request of the Director-General. The record of a complaint must be kept for at least four years after the complaint was made.</p> |

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| Flora and Fauna Management Sub Plan | <p>A Flora and Fauna Management Sub Plan will be prepared by RPV as a sub plan of the CEMP. This sub plan will include:</p> <p>(a) plans showing terrestrial vegetation communities; important flora and fauna habitat areas; locations where threatened species, populations or ecological communities were recorded; and areas to be cleared. The plans must also identify vegetation adjoining the Project where this contains important habitat areas and/or threatened species, populations or ecological communities;</p> <p>(b) methods to manage impacts on flora and fauna species (terrestrial and aquatic) and their habitat which may be directly or indirectly affected by the Project. These will include:</p> <p>i procedures for vegetation clearing, soil management and managing other habitat damage during Construction;</p> <p>ii methods to protect vegetation both retained within, and also adjoining, the Project from damage during Construction;</p> <p>iii a habitat tree management program including fauna recovery procedures and habitat maintenance (e.g. relocating hollows or installing nesting boxes);</p> <p>iv where possible, and where consistent with DEC or DPI requirements, strategies for re-using in rehabilitation works individuals of any threatened plant species that would be otherwise be destroyed by the Project;</p> <p>v performance criteria against which to measure the success of the methods</p> <p>(c) rehabilitation details including:</p> <p>i identification of locally native species to be used in rehabilitation and landscaping works, including flora species suitable as a food resource for threatened fauna species;</p> <p>ii methods to remediate affected aquatic habitats;</p> <p>iii the source of all seed or tube stock to be used in rehabilitation and landscaping works including the identification of seed sources within the Project. Seed of locally native species within the Project will be collected before Construction commences to provide seed stock for revegetation;</p> <p>iv methods to re-use topsoil (and where relevant subsoils) and cleared vegetation;</p> <p>v measures for the management and maintenance of all preserved, planted and rehabilitated vegetation;</p> <p>(d) a Weed Management Strategy including:</p> <p>i identification of weeds within the Project and adjoining areas;</p> <p>ii methods to treat and re-use weed infested topsoil;</p> <p>iii strategies to control the spread of weeds during Construction;</p> <p>(e) a program for reporting on the effectiveness of flora and fauna management measures against the identified performance criteria. Management methods must be reviewed where found to be ineffective;</p> <p>(f) the mitigation measures in Chapter 7 of the EA.</p> |
| Cultural Heritage Sub Plan          | <p>A Cultural Heritage Management Sub Plan will be prepared by RPV as part of the CEMP. The sub plan must incorporate the mitigation measures identified in Chapter 8 of the EA.</p>   |

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| Non Indigenous<br>Object        | In the event that a non-indigenous heritage item is uncovered during Construction, all work in the vicinity of the object will cease and RPV will contact the NSW Heritage Council to determine an appropriate course of action prior to the re-commencement of work in the vicinity of the item.  |
| Construction<br>Hours           | <p>Construction activities associated with the Development, including heavy vehicles entering and exiting the Site, will only be carried out between 7:00 am and 6:00 pm, Monday to Friday inclusive, and between 8:00 am and 1:00 pm on Saturdays. The following activities may be carried out in association with Construction outside of these hours:</p> <p>(a) any works that do not cause noise emissions to be audible at any nearby residences not located on the Premises;</p> <p>(b) the delivery of materials as requested by Police or other authorities for safety reasons; and</p> <p>(c) emergency work to avoid the loss of lives, property and/or to prevent environmental harm.</p> <p>Any work undertaken outside the specified construction hours, other than those specified in (a) – (c) above, will not be undertaken without prior consent of the DEC.</p> |



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| Soil and Water Management Sub Plan        | <p>As part of the CEMP, a Soil and Water Management Sub Plan will be prepared by RPV in consultation with Relevant Government Departments and Palerang Council. The Sub Plan will:</p> <ul style="list-style-type: none"> <li>(a) where relevant, be consistent with the RTA's Guidelines for the Control of Erosion and Sedimentation in Roadworks;</li> <li>(b) identify the Construction activities that could cause soil erosion or discharge sediment or water pollutants from the site;</li> <li>(c) describe management methods to minimise soil erosion or discharge of sediment or water pollutants from the site including a strategy to minimise the area of bare surfaces during Construction;</li> <li>(d) describe the location and capacity of erosion and sediment control measures;</li> <li>(e) identify the timing and conditions under which Construction stage controls will be decommissioned;</li> <li>(f) include the mitigation measures in Ch 5.3.3.1 and 5.5.4 of the EA, including measures to minimise dust on Taylors Creek Road and Western Leg Road;</li> <li>(f) include contingency plans to be implemented for events such as fuel spills; and</li> <li>(g) identify how the effectiveness of the sediment and erosion control system will be monitored, reviewed and updated.</li> </ul> <p>Construction</p> <p>An appropriately qualified soil scientist will be consulted according to a schedule identified in the Soil and Water Management Sub Plan to:</p> <ul style="list-style-type: none"> <li>(a) undertake inspections of temporary and permanent erosion and sedimentation control devices;</li> <li>(b) ensure that the most appropriate controls are being implemented;</li> <li>(c) check that controls are being maintained in an efficient condition; and</li> <li>(d) check that controls meet the requirements of any relevant approval and/or licence condition.</li> </ul> <p>The results of these inspections and any follow-up actions will be reported in the Construction Compliance Reports.</p> |
| Spoil and Fill Management                 | <p>For the purposes of the Development, RPV will ensure imported fill will be Virgin Excavated Natural Material as defined in the Environment Protection Authority's guideline <i>Assessment, Classification and Management of Liquid and Non-Liquid Wastes</i>.</p>   |
| Greenhouse and Energy Management Strategy | <p>A <i>Greenhouse and Energy Management Strategy</i> will be prepared by RPV prior to construction commencing, to ensure the use of non-renewable <i>resources</i> from Construction and Operation is minimised.</p>  |

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| Construction Traffic Management Sub Plan | <p>As part of the CEMP, a Construction Traffic and Transport Management Sub Plan will be prepared by RPV in consultation with Palerang Council, Goulburn Mulwaree Council, the RTA and NSW Police. The sub plan will:</p> <ul style="list-style-type: none"> <li>(a) include the mitigation measures outlined in Chapter 9 of the EA;</li> <li>(b) identify designated transport routes for heavy vehicles to the Development Site;</li> <li>(c) include measures to minimise traffic disruption through Goulburn and in the vicinity of the Development Site;</li> <li>(d) include measures to minimise disturbance from traffic noise;</li> <li>(e) include measures to manage Construction traffic to ensure the safety of: <ul style="list-style-type: none"> <li>(i) livestock and limit disruption to livestock movement;</li> <li>(ii) school children and limit disruption to school bus timetables; and</li> </ul> </li> <li>(f) include a community information program to inform the community of traffic disruptions resulting from the construction program.</li> </ul> |
| Road Dilapidation Report                 | <p>Road dilapidation reports will be prepared by RPV for the construction route where it passes along Braidwood Road, Bungendore Road, Collector Road, Taylors Creek Road and Western Leg Road. These reports must be prepared before Construction commences and after Construction is complete. Copies of the reports must be provided to the relevant roads authority. Any damage resulting from construction traffic, except that resulting from normal wear and tear, must be repaired at RPV's cost. Alternatively RPV may negotiate an alternative arrangement for road damage with the relevant roads authority.</p>  |
| Bushfire Risk Management Sub Plan        | <p>As part of the Construction and Operation EMPs, RPV will prepare, in consultation with the Taylors Creek Rural Fire Service, a Bushfire Risk Management Sub Plan based on the guidelines Planning for Bushfire Protection (RFS, 2001 or its latest edition). The sub plan will include:</p> <ul style="list-style-type: none"> <li>(a) details of the bushfire hazards and risks associated with the Development;</li> <li>(b) mitigation measures including contingency plans;</li> <li>(c) include the mitigation measures in Chapters 12.5.1 and 12.5.2 of the EA.</li> <li>(c) procedures and programs for liaison and regular drills with the Taylors Creek Rural Fire Service; and</li> <li>(d) procedures for regular fire prevention inspections by the Taylors Creek Rural Fire Service and implementation of any recommendations.</li> </ul>  |
| Waste Management and Re-use Sub Plan     | <p>As part of the CEMP and OEMP, RPV will prepare a Waste Management and Re-use Sub Plan to address the management of wastes during the Construction and Operation stages respectively in accordance with the NSW Government's Waste Reduction and Purchasing Policy. The Sub Plan will identify requirements for:</p> <ul style="list-style-type: none"> <li>(a) the application of the waste minimisation hierarchy principles of avoid/reduce/reuse/recycle/dispose;</li> <li>(b) waste handling and storage;</li> <li>(c) disposal of wastes. Specific details must be provided for cleared vegetation, contaminated materials, glass, metals and plastics, hydrocarbons (lubricants and fuels) and sanitary wastes; and</li> <li>(d) any waste material that is unable to be re-used, re-processed or recycled must be disposed at a facility approved to receive that type of waste;</li> </ul> <p>and will include the mitigation measures in Chapter 3.10.7.</p>   |

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| 3.1                     | RPV's project design is based on the layout shown in Figure 1.4 and incorporates 63 turbines. Actual siting and size of turbines may vary slightly dependent on the final design site conditions. The final design will be subject to Consent Authority review as part of the Construction Certificate Application process.  |
| 3.3.4                   | RPV will require the design of the substation to incorporate provision for containment of any oil spillage or leakage from the 33,000/330,000 volt transformer(s) including secondary containment.   |
| 3.3.5                   | RPV will require the design of the facilities building to incorporate collection of roof drainage and have a small septic system or composting toilet that complies with Council requirements.   |
| 3.4                     | The site access from public roads will be via entrances constructed as agreed by RPV, the property owners and Palerang Council to ensure safe negotiation by large vehicles. A lockable gate will be installed at a point set back from the road at each entrance point.   |
| 5.6.5<br>3.10.6         | In the case of areas of oil or fuel storage on-site, RPV will provide sufficient containment to contain any spillage that may occur at the location. Such sites will be monitored periodically for integrity of containment and adequacy of handling procedures. For the substation, containment measures will also include a secondary containment dam down-slope of the substation.                  |
| 6.10 / 7.6.8            | In consultation with the landowners, during construction selected tree planting may be undertaken by RPV to reduce the visibility of certain elements of the wind farm. The preferred types of plants for screening will be local native varieties but it may be necessary to plant non-natives that are fast growing where expediency is essential or where property owners would prefer non-natives. |
| 10.10                   | The closest neighbouring residences to the wind farm will be assessed by RPV for noise compliance post-commissioning.  |
| 10.10                   | If a noise nuisance is reported after the wind farm is commissioned, RPV will review the nature of the noise impact and assess the potential sources. If necessary, testing will be conducted to confirm that equipment performance is in accordance with the required noise specification.  |
| 10.10                   | If turbine operation is resulting in noise in excess of the SA EPA wind farm requirements for the relevant receivers, then RPV will vary operation of the relevant turbine(s) to achieve noise compliance. RPV may also consult with any affected landowner in regard to other measures such as installation of double glazing or other forms of sound insulation.                                     |
| 10.10                   | RPV will enter into agreements with non relevant receiver residences that exceed background +5 dB(A).  |
| 11.6                    | Prior to erection of the first towers, RPV will arrange for Airservices Australia to undertake the previously identified modifications to the Mt Majura Radar system.  |
| 11.6                    | Prior to construction RPV will ensure that any refinements of the turbine layout have been assessed in terms of their potential impact on fixed line radio links. Where necessary, the relevant communication service operator will be contacted to confirm operational details.   |
| 11.6                    | RPV will investigate and rectify interference to television reception caused by the project, that occurs at residences in areas surrounding the wind farm, following its commissioning of the wind farm.   |

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| 12.2.5                          | Prior to erection of the wind turbines, final details of the height and location of each wind turbine will be provided by RPV to CASA, Department of Defence and AirServices Australia. |