

18 August 2023



Department of Planning and Environment  
Nicole Brewer  
4 Parramatta Square,  
12 Darcy Street  
Parramatta NSW 2150

Dear Nicole,

## **Re: Crudine Ridge Wind Farm SSD 6697 – Proposed revision of BBAMP**

Squadron Energy (SQE) on behalf of Crudine Ridge Wind Farm Pty Ltd (CRWF) submitted the second year annual bird and bat monitoring report to the Department on 11 August 2023, in accordance with the approved Bird and Bat Adaptive Management Plan (BBAMP) which was developed in accordance with Schedule 3, Condition 22 of the CRWF Development Consent (SSD 6697).

The monitoring program has been implemented for 24 months of operation. A revised monitoring program has been recommended in the second year report, consistent with Section 4.7.1 of the approved BBAMP which states:

*'the BBAMP will be reviewed and reported upon on an annual basis...The reporting will focus on the BBAMP in terms of its effectiveness together with consideration of the intensity of effort and resourcing, and emerging understanding of the level of risk to avifauna....As this management plan is adaptive, further refinements to the program will be ....., in consultation with the State and Commonwealth agencies'.*

SQE provided the second year annual report to the BCD on 11 August 2023, and the BCD provided their support of the revised monitoring program on 17 August 2023. See Appendix A.

SQE proposes to submit a revised BBAMP, in the form of an Addendum Report, for the Secretary's approval, in accordance with Condition 15 of Schedule 2, which states:

*'With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.*

*To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.*

*With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.'*

Also pursuant to Condition 15 of Schedule 2, SQE is seeking the Secretary's agreement to revise the BBAMP without undertaking consultation with the Department of Climate Change, Energy, Environment and Water (DCCEEW), for the following reasons:

- Only three EPBC listed threatened bird species were assessed at low risk of impact in the approved BBAMP, the White-Throated Needle Tail (WTNT), Swift Parrot, and Regent Honeyeater.
- The low risk rating for the Swift Parrot and Regent Honeyeater was considered highly conservative, given the paucity of records around the Project.
- The approved BBAMP did not include any targeted species monitoring for the Swift Parrot and Regent Honeyeater.
- The approved BBAMP required that onsite occurrence of WTNT would be recorded during the targeted Wedge - Tailed Eagle (WTE) surveys.
- Over the 24 months of operational monitoring, none of these species have been observed.

- WTNT needle monitoring will continue in conjunction with WTE monitoring in accordance with the proposed updated program.
- The proposed changes to the monitoring program does not have any material impact on the likelihood of observing any of these threatened species, as monitoring will continue at all turbines in the middle of each season.

The revisions to the BBAMP will be based on recommendations made within the Year 2 Annual Monitoring report. The report recommends that monthly carcass searches cease for the following reasons:

- Two years of mortality search data, combined with Bird Utilisation Surveys (BUS) (ELA 2022) or pre-approval baseline surveys (ELA 2012), have provided a useful set of data to gain an understanding of the impact the wind farm is having on bird and bat species in the region.
- With the exception of Square-tailed Kite, no threatened bird species were recorded flying within the Rotor Swept Area (RSA) during all monitoring surveys to date.
- No bird species with the exception of the Wedge-tailed Eagle, requires an updated risk rating.
- The results from two years of monitoring and the mortality estimates suggest is unlikely that any local or regional population bird or bat has been significantly impacted by the operation of the CRWF.

It is proposed that the future bird and bat monitoring program will include the following:

- Seasonal carcass monitoring program will be undertaken during the middle month of each season (i.e. January, April, July, October) to cover the full annual life cycle of the target species groups and provide ongoing seasonal-based data for analysis and comparison.
- All 37 turbines will be surveyed to 60 m radius.
- Monitoring will focus on Wedge-tailed Eagle and other raptor species, along with bats (both microbats and flying-foxes).
- Flight paths of all raptor species (along with White-throated Needletail, if present) will continue to be tracked.
- Incidental monitoring carried out by CRWF operational staff will continue, as well as carrion removal.
- The findings of the monitoring program will be reported in accordance with Schedule 3 Condition 22 of SSD-6697 on an annual basis within three months of the end of the reporting period (which would have commenced from the date of its approval and formal adoption).

CRWF would aim to start implementing the updated monitoring program by October 2023, to ensure a seamless transition for the next annual reporting period. As such, a response from the Secretary is requested by early September to ensure timely commencement of the updated program.

If you require additional information or wish to discuss this matter, please contact me on 0476 882 365.

Yours sincerely,



Zeina Jokadar  
Environmental Advisor  
For and behalf of Crudine Ridge Wind farm Pty Ltd ACN 143 399 160

**Appendix A**

**BCD letter of support**



Our ref: DOC23/720297

Your ref:

Zeina Jokadar  
Environmental Advisor  
Squadron Energy  
[zeina.jokadar@squadronenergy.com](mailto:zeina.jokadar@squadronenergy.com)

Dear Zeina,

### **Crudine Ridge Wind Farm – BBAMP Annual Report**

I refer to your request via e-mail dated 11 August 2023 to the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment (DPE) regarding the second annual report on the implementation of the Bird and Bat Adaptive Management Plan (BBAMP).

BCS is satisfied that the report adequately outlines the second year of operational phase monitoring undertaken during 2022-2023.

We note that the report recommends ongoing monitoring focused on Wedge-tailed Eagle, other raptor species, and bats. It is noted that this will involve a change in the monitoring program involving:

- a revised seasonal carcass monitoring program to be undertaken during the middle month of each season (i.e. January, April, July, October)
- a single survey of the 60 m inner search zone of all 37 turbines per season
- flight paths of all raptor species (along with White-throated Needletail, if present) will continue to be tracked in real time during surveys.

BCS has on-going concerns regarding the cumulative impacts of existing and proposed wind farms on Wedge-tailed Eagles and White-striped Freetail Bats and supports the proposed changes to the BBAMP to extend the monitoring period for an two additional years.

If you have any questions about this advice, please do not hesitate to contact David Geering, Senior Conservation Planning Officer, via [david.geering@environment.nsw.gov.au](mailto:david.geering@environment.nsw.gov.au) or (02) 6885 0335.

Yours sincerely,



**Liz Mazzer**  
**A/Senior Team Leader Planning North West**  
**Biodiversity, Conservation and Science Directorate**

16 August 2023