

**Attexó**

**Lotus Creek Wind Farm (EPBC  
2020/8867) Annual Compliance Report**  
Year 1 - 16 September 2024 to 15 September 2025



Document Information

Document	Lotus Creek Wind Farm (EPBC 2020/8867) Annual Compliance Report
Attexo ref	CSE-010
Date	5 December 2025
Prepared by	Shahn Nestor and Amanda Rukuwai
Reviewed by	Faz Namdarian and Jeromy Claridge

Quality Information

Rev	Date	Details	Name/position	Authorisation	Signature
0	05-12-2025	Issued for use	Jeromy Claridge Partner and Principal Environmental Scientist		

Prepared for:  
Lotus Creek Wind Farm Pty Ltd

Prepared by:  
Attexo Group Pty Ltd  
attexo.com.au  
ABN 75 637 138 008

**Attexo Group Pty Ltd 2025**  
The information contained in this document produced by Attexo Group Pty Ltd is solely for the use of the Client identified on the cover sheet for the purpose for which it has been prepared and Attexo Group Pty Ltd undertakes no duty to or accepts any responsibility to any third party who may rely upon this document. All rights reserved. No section or element of this document may be removed from this document, reproduced, electronically stored or transmitted in any form without the consent of Attexo Group Pty Ltd.



# Contents

- 1. Introduction ..... 1
  - 1.1 Project Details ..... 1
- 2. Description of Activities ..... 2
- 3. Compliance Assessment ..... 3
  - 3.1 EPBC Conditions Compliance ..... 3
  - 3.2 Management Plans Compliance ..... 21
- 4. Correcting non-compliances ..... 51
  - Department Notification ..... 51
- 5. Conclusion ..... 52
- 6. Declaration of Accuracy ..... 53

## Appendices

- Appendix A Definitions
- Appendix B Evidence list

## Tables

- Table 1.1: Project details ..... 1
- Table 3.1: Summary of compliance results ..... 3
- Table 3.2: EPBC 2020/8867 Compliance Assessment ..... 4
- Table 3.3: Summary of compliance results – management plans ..... 21
- Table 3.4: OAMP Compliance Assessment ..... 22
- Table 3.5: MNES MP Compliance Assessment ..... 26
- Table A.1: Definitions
- Table B.1: Evidence list

# 1. Introduction

The Lotus Creek Wind Farm (LCWF) Project (the Project) involves the development of a wind farm, including up to 55 wind turbines and associated ancillary infrastructure, within privately held agricultural land location approximately 175 kilometres (km) north-west of Rockhampton in Queensland. The Project was deemed a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 8 February 2021 (EPBC 2020/8867). The Project was assessed by preliminary documentation and subsequently approved with conditions by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 31 October 2022. Commencement of the action in accordance with the EPBC Act approval occurred on 16 September 2024.

This report provides the first compliance report (Year 1) required under the EPBC Act approval, Condition 58, for the period between 16 September 2024 to 15 of September 2025. This report has been developed in line with the *Annual Compliance Report Guidelines, DCCEEW 2023* (henceforth referred to as the *Annual Compliance Report Guidelines*) and includes:

- Project details as specified (**Table 1.1**).
- A description of works completed during the reporting period (**Section 2**).
- An assessment of compliance against conditions (**Table 3.2**).
- An assessment of demonstrating that the requirements of plans required under the approval have been implemented (**Section 3.2, Table 3.4 and Table 3.5**).
- A declaration of accuracy signed by the approval holder (**Section 6**).

## 1.1 Project Details

Project details as required by section 3.4 of the *Annual Compliance Report Guidelines* are provided in **Table 1.1**.

Table 1.1: Project details

Item	Project Information
EPBC number	EPBC 2020/8867
Project name	Lotus Creek Wind Farm
Approval holder and ACN or ABN	Lotus Creek Wind Farm Pty Ltd ABN: 51 633 724 571
The approved action	To construct and operation a wind farm with up to 55 turbines in the Connors Ranges, approximately 175 km north-west of Rockhampton in Queensland.
Location of the Project	Approximately 175 km north-west of Rockhampton
Person accepting responsibility for this report <sup>1</sup>	Andrew Wilson
Reporting period	16 September 2024 to 15 September 2025
Date of report	5 December 2025

<sup>1</sup> See signed declaration provided in **Section 6** of this compliance report.



## 2. Description of Activities

The Project is currently in the construction phase, with vegetation clearing and civil works being underway during the reporting period. Turbine installation and electrical cabling had not been undertaken during the reporting period. Progressive rehabilitation has also commenced at some locations. Construction works are overseen by Blue Power Partners (BPP) on behalf of CS Energy, with Balance of Plant (BoP) works being undertaken by an Engineering, Procurement, and Construction (EPC) Contractor. The BoP scope includes all civil and vegetation clearing works associated with the Project, to which the bulk of construction related environmental aspects relate.

A summary of work completed during the reporting period is as follows:

- Access tracks and drainage:
  - Topsoil stripping: 37.28 km of 43.88 km (85 %) complete
  - Bulk earthworks: 28.96 km (66 %) complete
  - Pavement placement: 18.87 km (43 %) complete
  - Rehabilitation: 16.50 km (38 %) complete
  - Construction of Yellow Creek bridge: 100m (95 %) complete
- Hardstands and foundations:
  - 37 of 46 (80 %) hardstands commenced
  - 11 of 46 (24 %) hardstands complete
  - 22 wind turbine generator (WTG) foundations excavated
- Public Roads – St Lawrence–Croydon Road (SLCR)
  - Wind farm accommodation camp & Marlborough Sarina Road intersections completed
  - 23 km of road upgrade completed
  - Main Creek Bridge piling completed
- Substation and Compound
  - Substation area clearing and access intersection sealed, bulk earthworks and pad formation underway
  - Main compound and Stage 1 laydown area, administration office infrastructure established and operational
- Environmental and rehabilitation
  - 302.47 ha (100%) of vegetation clearing completed
  - 16 km of progressive rehabilitation completed
  - Cultural heritage salvage works completed.



### 3. Compliance Assessment

This compliance assessment has been developed to address requirements set out in Section 3.6 of the *Annual Compliance Report Guidelines*. Results of this assessment are provided in **Table 3.2**. Compliance designations applied for the assessment are as per Section 3.7 of the aforementioned guidelines, and are reproduced below:

- 1. **Compliant:** *'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.*
- 2. **Non-compliant:** *A designation of 'non-compliance' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met. This includes insufficient or no evident records to support a determination.*
- 3. **Not applicable:** *A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.*

This compliance assessment, does not represent, nor can be expected to represent, an exhaustive and absolute assurance of the Approval Holder's compliance with:

- The Conditions of EPBC approval 2020/8867.
- All and every commitment made in plans required under the approval.

This compliance assessment is based on an evaluation of representative evidence considered adequate to provide a reasonable assessment of compliance with conditions and to inform findings. For the absence of doubt, the compliance assessment:

- Cannot and has not considered, reviewed and evaluated all and every possible record or other potential piece of evidence that may exist and be relevant.
- Excluded the Approval Holder's compliance with commitments and procedures detailed in appendices, attachments, or enclosures of plans required under the approval. Only elements reasonably necessary to evaluate compliance with overarching conditions of approval and plan commitments were assessed.

#### 3.1 EPBC Conditions Compliance

An assessment of the Project against the conditions of approval (EPBC 2020/8867) was conducted. Compliance was assessed against 78 conditions<sup>2</sup>. The assessment found that 21 conditions were compliant, 1 resulted in non-compliance, and 56 conditions were not applicable. A summary is provided in **Table 3.1**.

Table 3.1: Summary of compliance results

Total conditions	Total non-applicable conditions	Total applicable conditions	# compliant	# non-compliant
78	55	23	22	1

<sup>2</sup> Condition numbers include sub-conditions 69A and 69B, as well as all attachments.



Table 3.2: EPBC 2020/8867 Compliance Assessment

Condition number	Condition	Compliance designation	Discussion / evidence
<b>PART A – CONDITIONS SPECIFIC TO THE ACTION</b>			
1.	The approval holder must not clear or undertake any construction activities outside of the development footprint.	Compliant	<ul style="list-style-type: none"> <li>Spatial data for the wind farm vegetation clearing extent (Appendix B, item 18) coincides with the EPBC Approved development footprint. Project design spatial data (Appendix B, item 156), and aerial imagery show Project infrastructure / disturbance as being contained within the approved disturbance footprint.</li> <li>A comparison of current spatial data of the overhead transmission line (OHTL) component of the footprint (Appendix B, item 204) against the indicative development footprint shown in EPBC 2020/8867 Attachments A1-A5 and aerial imagery, shows construction work associated with this portion of the Project has extended beyond the development footprint shown in EPBC 2020/8867 Attachments A1-A5, but is within the project area.</li> <li>Vegetation Disturbance Permits (VDPs) (Appendix B, items 13-17 and 161-165) include permissibility assessment and controls checklist providing for containment of works within approved boundaries, footprint mapping and signed acknowledgement of controls by personnel are attached to VDPs. VDP close out involves signed declaration by EPC Contractor representatives that the work area has been inspected and works completed in accordance with VDP. Subsequently, subcontractor inspection records (Appendix B, items 46-50) include checklist items for containment of works and boundary marking, where checked these items were recorded as compliant in all the examples provided. Notes on completed forms demonstrate checks of GPS controls in vegetation clearing machines.</li> <li>The LCWF Monthly Report for August 2025 (Appendix B, item 35) documents 30 VDPs raised for the 12-month period commencing September 2024 and the VDP / Pre-clearance register (Appendix B, item 178) tracks pre-clearance surveys undertaken against VDPs issued demonstrating comprehensive coverage.</li> <li>The proponent initiated first quarter environmental audit report (including site inspection and desktop assessment with evidence sighted in Appendix B, item 4) documents compliance with this condition.</li> </ul>
2.	The approval holder must not construct more than 46 wind turbines and associated infrastructure in the development footprint.	Compliant	<ul style="list-style-type: none"> <li>The summary of construction works provided by the project engineer (Appendix B, item 152) describes civil infrastructure to support a maximum of 46 wind turbines.</li> <li>Project spatial files (Appendix B, Item 153) contain data for 46 wind turbines and the subcontractor's monthly and weekly progress reports (Appendix B, items 24-35 and 60-66 respectively) also report progress against 46 WTG hardstands and foundations.</li> </ul>
3.	The approval holder must construct the wind turbines in the locations indicated within the project area specified in Attachments A1-A5, shown by the blue dots and labelled 'Turbines'. Micro-siting of wind turbines is permitted in accordance with condition 1 of the SARA Decision notice – Lotus Creek Wind Farm within the project area provided clearance does not exceed the clearance limits specified in condition 4.	Compliant	<ul style="list-style-type: none"> <li>Turbine locations shown in current Project spatial data (Appendix B, Item 153) coincide with those shown in the specified attachments.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (including site inspection and desktop assessment with evidence sighted listed) (Appendix B, item 4) documents compliance with this condition.</li> </ul>
4.	To minimise impacts on EPBC Act listed threatened species and EPBC Act listed migratory species, the approval holder must not clear more than 399.1 hectares (ha) within the development footprint, including no more than: <ol style="list-style-type: none"> <li>341.36 ha of Koala habitat;</li> <li>16.39 ha of Squatter Pigeon breeding habitat;</li> <li>32.35 ha of Squatter Pigeon foraging habitat; and</li> <li>48.75 ha of Greater Glider habitat.</li> </ol>	Compliant	<ul style="list-style-type: none"> <li>Spatial data for the wind farm vegetation clearing extent (Appendix B, item 18) coincides with the EPBC approved development footprint which considers the specified clearing limits.</li> <li>Vegetation clearing completed against clearing limits is monitored via a dedicated EPBC clearing limits tracker (Appendix B, item 9) as at 11/9/25 clearing limits recorded remained below the specified limits.</li> <li>Transmission Line activity spatial data for vegetation clearing has been tracked using drone imagery (Appendix B, item 194).</li> <li>Analysis of the evidence described above confirms vegetation clearing undertaken for the approved action did not exceed the specified clearing limits.</li> </ul>





Condition number	Condition	Compliance designation	Discussion / evidence
<b>Environmental offsets – Offset Area Management Plan</b>			
5.	Prior to commencement of the action, the approval holder must submit to the department for the approval of the Minister an Offset Area Management Plan (OAMP) proposing the environmental offset site(s) for Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat to the satisfaction of the Minister.	Compliant	<ul style="list-style-type: none"> <li>OAMP approved prior to commencement, evidence: <ul style="list-style-type: none"> <li>Notice of commencement letter dated 25/9/24 (Appendix B, item 5) specifies commencement date of 16/9/24.</li> <li>Letter confirming approval of OAMP dated 9/09/24. (Appendix B, item 2).</li> </ul> </li> </ul>
6.	The approval holder must: <ul style="list-style-type: none"> <li>a. not commence the action until the OAMP has been approved by the Minister;</li> <li>b. commence implementing the OAMP upon commencement of the action; and</li> <li>c. continue implementing the approved OAMP for the remaining duration of the approval.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>a. Action did not commence prior to OAMP approval, evidence: <ul style="list-style-type: none"> <li>Notice of commencement letter dated 25/9/24 (Appendix B, item 5) specifies commencement date of 16/9/24.</li> <li>DCCEEW OAMP approval letter dated 9/8/2024 (Appendix B, item 2) predates commencement.</li> </ul> </li> <li>b. Implementation of OAMP initiated from commencement of the action, evidence: refer to <b>Table 3.4</b>.</li> <li>c. OAMP implementation remains ongoing, evidence: refer to <b>Table 3.4</b>.</li> </ul>
7.	The OAMP must: <ul style="list-style-type: none"> <li>a. be in accordance with the EPBC Act Environmental Offsets Policy;</li> <li>b. be prepared by a suitably qualified ecologist;</li> <li>c. include the details outlined in Attachment B; and</li> <li>d. be attached to the legal mechanism used to secure the environmental offset area(s). Each offset area(s) must be secured within 12 months of the commencement of the action. The approval holder must notify and provide evidence to the department within 5 business days of any environmental offset area(s) being secured.</li> </ul>	Non-compliant	<ul style="list-style-type: none"> <li>a. to c.: Compliant, DCCEEW approval of the OAMP (Appendix B, item 2) demonstrates that the OAMP has satisfied the content requirements.</li> <li>d. Non-compliant, a legally binding mechanism to secure the offset area was not executed by 16/9/25 (12 months from commencement of the action): <ul style="list-style-type: none"> <li>An application for a Voluntary Declaration under the <i>Queensland Vegetation Management Act 1999</i> (VM Act) was submitted to the Queensland Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development (DNRMMRRD) on 30/1/25 (evidenced by letter a from DNRMMRRD to the landholder [Appendix B, item 20]), however approval remained outstanding at the end of the specified 12 month timeframe.</li> </ul> </li> </ul> <p>In relation to item (d). it is noted that:</p> <ul style="list-style-type: none"> <li>The nominated offset areas were secured through Option agreements with landholders, ensuring that no clearance, damage or harm to native vegetation or habitat and no change to existing farming practices was able to occur within the offset area, thus biodiversity values present have been maintained and no impacts to Matters of National Environmental Significance (MNES) have resulted from the delay.</li> <li>A Declaration over the offset area was subsequently made by DNRMMRD over on 27/10/25.</li> <li>An incident notification relating to the offset area not being legally secured within 12 months of approval was submitted to DCCEEW in accordance with condition 59 (Appendix B, item 8).</li> </ul>
<b>Environmental offsets – (OAMP completion criteria)</b>			
8.	To ensure that the offsets required for Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat provide a conservation gain in accordance with the EPBC Act Environmental Offsets Policy, the completion criteria specified in the approved OAMP: <ul style="list-style-type: none"> <li>a. must be achieved within 20 years of the commencement of the action; and</li> <li>b. once achieved, must be maintained or improved for the remaining duration of the approval.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered; the offset criteria timeframe has not elapsed.</li> </ul>





Condition number	Condition	Compliance designation	Discussion / evidence
9.	<p>The approval holder must, within 40 business days of the 20th anniversary of the commencement of the action:</p> <ol style="list-style-type: none"> <li>submit to the department a report detailing the area and condition of Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat in all offset area(s) specified in the approved OAMP; and</li> <li>notify the department in writing of any completion criteria at any offset area(s) specified in the approved OAMP that have not been achieved and the likely reasons that these completion criteria have not been met; and</li> <li>if any completion criterion has not been achieved within the 20th anniversary of the commencement of the action, the approval holder must submit to the department for the Minister's approval an OAMP to address the shortfall in environmental offsets consistent with the Environmental Offsets Policy, and the approval holder must implement the approved OAMP, or any subsequent version of the OAMP approved by the Minister in writing, for the remaining duration of this approval.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered; the offset criteria timeframe has not elapsed.</li> </ul>
<b>Environmental Management Plan</b>			
10.	To avoid, mitigate and manage impacts of the action on EPBC Act listed threatened species and EPBC Act listed migratory species and their habitat, the approval holder must submit to the department for the approval of the Minister, a Matters of National Environmental Significance (MNES) Management Plan to the satisfaction of the Minister.	Compliant	<ul style="list-style-type: none"> <li>MNES MP submitted for approval prior to commencement, evidence: <ul style="list-style-type: none"> <li>Notice of commencement letter dated 25/9/24 (Appendix B, item 5) specifies commencement date of 16/9/24.</li> <li>DCCEEW MNES MP (and condition variation) approval letter dated 8/8/2024 (Appendix B, item 1) predates commencement and demonstrates satisfaction of the Minister.</li> </ul> </li> </ul>
11.	The approval holder must not commence the action until the MNES Management Plan has been approved by the Minister.	Compliant	<ul style="list-style-type: none"> <li>As above for condition 10.</li> </ul>
12.	The approved MNES Management Plan must be implemented upon commencement of the action and for the duration of the approval.	Compliant	<ul style="list-style-type: none"> <li>The assessment provided in <b>Table 3.5</b> demonstrates implementation of the MNES MP was initiated from commencement of the action and remains ongoing.</li> </ul>
13.	The MNES Management Plan must take all reasonable steps to ensure that impacts to EPBC Act listed threatened species and EPBC Act listed migratory species, are avoided and mitigated.	Compliant	<ul style="list-style-type: none"> <li>DCCEEW MNES MP (and condition variation) approval letter dated 8/8/2024 (Appendix B, item 1) demonstrates the Minister's satisfaction that the MNES MP meets the approval criteria.</li> </ul>
14.	Ensure that the action does not impact on MNES located outside of the development footprint, including areas outside the project site, resulting from sediment run-off from the development footprint.	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated second quarter environmental audit report (Appendix B, item 218) undertaken by specialist Erosion and Sediment Control (ESC) consultants did not report any impacts to MNES values resulting from sediment run-off from the development footprint.</li> <li>The sample of incident records provided (Appendix B, items 56 and 57) involving sediment discharge did not report impacts to MNES values.</li> <li>The sample of inspection records provided (Appendix B, items 46-50) did not report impacts to MNES values resulting from sediment discharge.</li> <li>The sample of HSE Incidents and Actions Register for August 2025 (Appendix B, item 37) provides a cumulative register of logged hazards and incidents for the reporting period, but did not include records of MNES impacts due to sediment discharge.</li> <li>The Field Map Environmental Works Plan (Appendix B, items 83-87) includes a geofence alert system for OHTL construction activities to ensure compliance and prevent impacts on MNES outside the approved development footprint, by providing real-time notifications when machinery or personnel cross approved boundaries.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
15.	The MNES Management Plan must: <ul style="list-style-type: none"> <li>a. include details of specific environmental outcomes to be achieved to avoid, mitigate and manage impacts on EPBC Act listed threatened species and EPBC Act listed migratory species and their habitat during construction, operation and decommissioning of the action;</li> <li>b. include commitments to achieve the objectives;</li> <li>c. be prepared by a suitably qualified ecologist;</li> <li>d. be in accordance with the department's Environmental Management Plan Guidelines;</li> <li>e. specify reporting and review mechanisms, and documentation standards to demonstrate compliance with the MNES Management Plan; and</li> <li>f. include the requirements specified in Attachment D.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>• DCCEEW MNES MP (and condition variation) approval letter dated 8/8/2024 (Appendix B, item 1) demonstrates the Minister's satisfaction that the MNES MP meets the approval criteria.</li> </ul>
16.	The MNES Management Plan must state and justify a speed limit to vehicles operating within the project site during project construction, operation and decommissioning to minimise impacts to MNES.	Compliant	<ul style="list-style-type: none"> <li>• The MNES MP specifies a 60 km/hr speed limit within the development footprint in areas mapped as Koala habitat or Squatter Pigeon breeding habitat, reduced to 40 km/hr outside of daylight hours, with the timing and frequency of this control being 'at all times' (i.e. during all phases of the Project), (Appendix B, item 236)</li> <li>• DCCEEW MNES MP (and condition variation) approval letter dated 8/8/2024 (Appendix B, item 1) demonstrates the Minister's satisfaction that the MNES MP meets the approval criteria.</li> </ul>
17.	In accordance with the SARA Decision notice – Lotus Creek Wind Farm, six months prior to commencement of decommissioning of the action, the approval holder must provide to the department for approval by the Minister, a decommissioning and rehabilitation MNES Management Plan to the satisfaction of the Minister, outlining measures to manage MNES during the decommissioning stage of the action and rehabilitation.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered; decommissioning was not initiated during the reporting period.</li> </ul>
<b>Bird and Bat Management</b>			
18.	The approval holder must, at least 3 months prior to commencement of the action, submit to the department for the approval of the Minister, a Bird and Bat Management Plan (BBMP) to the satisfaction of the Minister.	Compliant	<ul style="list-style-type: none"> <li>• Notice of commencement letter dated 25/9/24 (Appendix B, item 5) specifies commencement date of 16/9/24.</li> <li>• Email correspondence (Appendix B, item 3) demonstrates BBMP submission date of 5/5/24, greater than three (3) months prior to commencement of the action.</li> </ul>
19.	The BBMP must be prepared by a suitably qualified bird and bat ecologist.	Compliant	<ul style="list-style-type: none"> <li>• Section 1.2 of the BBMP (Appendix B, item 154) describes the qualifications held by contributing Authors employed by specialist consultants Nature Advisory Pty Ltd.</li> </ul>
20.	The approval holder must not commission the action until the BBMP has been approved by the Minister.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
21.	The approval holder must implement the approved BBMP upon its approval for the remaining duration of the approval.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
22.	The approval holder must undertake all relevant pre-commissioning surveys outlined in the approved BBMP prior to commissioning, including, but not limited to baseline carcass searcher detection trials and scavenger trials.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
23.	To determine use of potential updraughts and roosting sites in the project site, surveys for White-throated Needletails (WTNT) must include early evening surveys.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
24.	The BBMP must specify the migratory period for relevant EPBC Act migratory species and include justification with references to the department's Species Profile and Threats Database or other sources endorsed by the department.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – Environmental outcomes</b>			
25.	The environmental outcome of implementing the BBMP must be to minimise the impacts from operation of the action on EPBC Act listed bird and bat species.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
<b>Bird and Bat Management – Pre-commissioning surveys and site characterisation</b>			
26.	The BBMP must include the results of 24 months of baseline project site surveys undertaken prior to the commissioning for EPBC Act listed bird and bat species.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
27.	The surveys required under condition 26 must be taken over relevant seasons and be of an appropriate duration and spatial coverage to adequately evaluate site utilisation by EPBC Act listed bird and bat species.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
28.	<p>Preliminary site characterisation must be undertaken to identify all drivers of EPBC Act listed bird and bat species presence in, and utilisation of, the project site. This must consider and describe:</p> <ol style="list-style-type: none"> <li>site characteristics including key habitat features, topography, prevailing wind and weather patterns, wetlands (including in the broader region of the project site) and distance to potential nesting, roosting and foraging areas; and</li> <li>species characteristics including flight and demographic factors, behaviour in the project site, flight paths (including migratory flight paths), flight heights and characteristics (e.g. soaring or flocking) and population size.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
29.	<p>The BBMP must be consistent with relevant departmental policies and guidelines including:</p> <ol style="list-style-type: none"> <li>the Onshore Wind Farms – interim guidance on bird and bat management or subsequent approved versions;</li> <li>the department's Species Profile and Threats Database; and</li> <li>relevant approved conservation advice and recovery plans to predict potential changes to EPBC Act listed bird and bat species site utilisation during operation and the risk of turbine collision and barotrauma impacts on EPBC Act listed bird and bat species.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – Site-wide risk assessment</b>			
30.	<p>The BBMP must identify each EPBC Act listed bird and bat species at risk of injury and/or mortality associated with the project based on a single project site-wide assessment. The impact risk assessment must include consideration of, but is not limited to:</p> <ol style="list-style-type: none"> <li>the site utilisation surveys required under condition 26 and the preliminary site characterisation required under condition 28;</li> <li>potential changes in project site utilisation by the EPBC Act listed bird and bat species during operation;</li> <li>the distribution of potential and known habitat for the EPBC Act listed bird and bat species in the project site and the surrounding region; and</li> <li>the characteristics of the EPBC Act listed bird and bat species such as feeding and migratory behaviour and expected frequency, flight behaviour and likely periods of presence in the project site.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – Turbine-level risk rating</b>			
31.	<p>For every EPBC Act listed bird and bat species identified as at risk by the pre-commissioning surveys and site characterisation impact risk assessment required under condition 30, the approval holder must either:</p> <ol style="list-style-type: none"> <li>undertake mathematical modelling to assign a risk profile (low, medium or high) to each turbine in the development footprint for each EPBC Act listed bird and bat species, OR</li> <li>assign a risk profile of 'high' to each turbine in the development footprint for all EPBC Act listed bird and bat species that have not undergone mathematical modelling.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
32.	If mathematical modelling is undertaken under condition 31.a, the BBMP must include maps of the project site showing the risk profile for each EPBC Act listed bird and bat species for each turbine as determined by the mathematical model.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
33.	<p>If mathematical modelling is undertaken in accordance with condition 31.a., this must:</p> <ol style="list-style-type: none"> <li>be informed by the site utilisation surveys required under condition 26 and the preliminary site characterisation required under condition 28 and a current literature review;</li> <li>incorporate a project site-wide assessment and assign a risk profile to each turbine;</li> <li>describe the choice of mathematical model used including assumptions, uncertainties, data used and model outputs; and</li> <li>provide the recommendations of a peer review of the mathematical modelling report chosen and how the recommendations of the peer review have been addressed.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – Initial post-commissioning monitoring</b>			
34.	<p>The BBMP must specify and commit to post-commissioning EPBC Act listed bird and bat species project site utilisation surveys which must:</p> <ol style="list-style-type: none"> <li>commence within 3 months after commissioning;</li> <li>be undertaken over a period of at least 24 months;</li> <li>be undertaken in each of at least two wet seasons and two dry seasons in succession; and               <ol style="list-style-type: none"> <li>a commitment must be given, if the season is atypical (e.g. if the wet season is experiencing drought), to conduct the surveys under the more typical weather conditions.</li> </ol> </li> <li>ensure that species behaviour changes, including any avoidance of turbines and altered project site utilisation, is detected;</li> <li>be designed to support a BACI (Before-After, Control-Impact) monitoring framework;</li> <li>be conducted by a suitably qualified bird and bat ecologist;</li> <li>be of a spatial coverage (including taking into consideration the final turbine layout and visibility) to adequately evaluate site utilisation by EPBC Act listed bird and bat species;</li> <li>include site utilisation surveys and proposed timings which are consistent with the methodology/ies of the baseline pre-commissioning project site utilisation surveys required under condition 26; and</li> <li>be designed to inform the adaptive management framework and enable timely implementation of corrective actions.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
<b>Bird and Bat Management – Adaptive management framework</b>			
35.	<p>To ensure the environmental outcomes will be achieved for relevant EPBC Act listed bird and bat species, the BBMP must include an adaptive management framework. The adaptive management framework must, at a minimum:</p> <ol style="list-style-type: none"> <li>specify the nature, timing and frequency of ongoing monitoring programs for the life of the approval to detect injury and mortality over the duration of project operation for each 'at risk' EPBC Act listed bird and bat species turbine risk profile (low, medium and high) as identified under condition 31;</li> <li>include additional survey effort in the project site for EPBC Act listed bird and bat species identified as at risk under condition 31 at a temporal and spatial resolution relevant to the level of risk profile assigned in accordance with condition 31;</li> <li>detail implementation of avoidance and mitigation measures;</li> <li>specify timeframes for the implementation of corrective actions if monitoring activities detect specified impact triggers and/or indicate the environmental outcomes will not be achieved;</li> <li>specify mitigation measures to minimise impacts to Red Goshawk if a Red Goshawk nest is detected in the project site during the period of this approval prior to completion of the action;</li> <li>propose alternative mitigation and corrective measures supported by scientific literature if monitoring activities indicate that the environmental outcome has not been achieved;</li> <li>detail carcass detection surveys, including timing, frequency and search areas. Surveys should take account of the results of searcher efficiency trials, new techniques and technologies and risk profiles of individual turbines to maximise carcass detection resulting from turbine collision and barotrauma during operation;</li> <li>a discussion on enhancing the visibility of turbine blades to birds and bats;</li> <li>provide advice on measures to avoid and mitigate impacts on EPBC Act listed threatened species and EPBC Act listed migratory species in the project site and the broader Connors Ranges, including areas located outside of the project site from increased predators resulting from increased carcasses from turbine strike and barotrauma associated with operation of the project;</li> <li>specify processes for periodic re-evaluation of utilisation surveys, monitoring programs, impact risk assessments (including mathematical modelling) and mitigation and corrective measures; and</li> <li>be designed to clearly demonstrate the linkages between: <ol style="list-style-type: none"> <li>the environmental outcomes;</li> <li>implementation of mitigation and management measures;</li> <li>ongoing monitoring, reporting and investigations; and</li> <li>implementation of corrective actions to ensure the environmental outcomes will be achieved.</li> </ol> </li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
36.	<p>The approval holder must evaluate the effectiveness of the measures implemented to avoid and mitigate impacts of turbine collision on EPBC Act listed bird and bat species and report on that evaluation, and performance against the impact triggers, in each compliance report required under condition 59.</p>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
<b>Bird and Bat Management – Carcass detection surveys</b>			
37.	The BBMP must include a commitment for the approval holder to undertake carcass search efficiency trials associated with turbine collision and barotrauma during operation.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
38.	<p>The carcass search efficiency trials should include, but not be limited to:</p> <ol style="list-style-type: none"> <li>an explanation of the approach undertaken, including a description of uncertainty in different components of the study design (e.g. searcher efficiency, carcass persistence, etc.) and how uncertainty has been addressed; and</li> <li>consideration of bias associated with carcass removal by Northern Quolls and feral cats, foxes, dogs and pigs.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – Impact triggers</b>			
39.	<p>If an impact trigger is reached or exceeded, the approval holder must:</p> <ol style="list-style-type: none"> <li>implement the relevant adaptive management procedure specified in the BBMP; and</li> <li>report on the steps taken and outcomes of implementing the adaptive management procedure (on each occasion that an impact trigger is reached or exceeded), and include: <ol style="list-style-type: none"> <li>details of the mitigation measures that have been or will be implemented; and</li> <li>an assessment of their likely effectiveness in the subsequent compliance report required under condition 58.</li> </ol> </li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
40.	Impact triggers that are reached or exceeded must be reported to the department within 5 business days of being detected.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – White-throated needletail management</b>			
41.	The BBMP must specify an indirect offset for approval by the Minister for the White-throated Needletail impact trigger 1, which meets the requirements of the Environmental Offset Policy	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
42.	<p>If the approval holder detects that the White-throated Needletail impact trigger 2 has been reached or exceeded, the approval holder must:</p> <ol style="list-style-type: none"> <li>report this to the Minister within five business days of the detection including the turbines which contributed to the White-throated Needletail impact trigger 2 being reached; and</li> <li>cease operation of all turbines in the project site identified as contributing to the White-throated Needletail impact trigger 2 and any additional turbines that later contribute to exceedance of White-throated Needletail impact trigger 2.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
43.	<p>If the approval holder has been required to cease operation of turbine/s pursuant to condition 42.b, the approval holder must not recommence operation of the specified turbine/s under condition 42.b until:</p> <ol style="list-style-type: none"> <li>the BBMP has been updated to include further measures to avoid and mitigate the risk of further impacts to the White-throated Needletail and is provided to the Minister; and</li> <li>it is deemed acceptable by the Minister and approval has been received from the Minister in writing.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
44.	Operational ceasing of turbines under condition 42.b. for White-throated Needletail impact trigger 2 only applies during migratory periods.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – Red Goshawk management</b>			
45.	If a Red Goshawk nest is identified in the project site during the period of this approval and prior to completion of the action, the approval holder must notify the department of its presence and location within 10 business days of its detection.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
46.	The BBMP must specify an indirect offset for approval by the Minister for the Red Goshawk impact trigger, which meets the requirements of the Environmental Offset Policy.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
47.	If the approval holder detects that the Red Goshawk impact trigger has been reached or exceeded, the approval holder must report this to the Minister within five business day of the detection.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
48.	<p>If the Red Goshawk impact trigger is reached/exceeded the approval holder must undertake a review of the Red Goshawk impact trigger exceedance, including reassessing the Red Goshawk use of the project site and identification and implementation of appropriate monitoring and management measures. The review must:</p> <ol style="list-style-type: none"> <li>include an assessment of Red Goshawk individuals and their nests in the vicinity of the Red Goshawk impact trigger and broader region that is acceptable to the Minister. This may include surveys of additional vantage points and nest locations within 200 km of the project site;</li> <li>include consideration of recent sightings of Red Goshawks and their nests in the project site and surrounding area including outside of the project site;</li> <li>include updates to the impact assessment of project operation on the Red Goshawk and provide proactive measures to avoid and mitigate the risk of further Red Goshawk impact trigger exceedance events;</li> <li>include updates to the risk assessment for the Red Goshawk required under condition 30; and</li> <li>be submitted to the Minister within 90 business days of the Red Goshawk impact trigger being reached/exceeded.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
49.	If the Minister is not satisfied with the review provided in accordance with condition 48, including the efficacy of the measures to avoid and mitigate the risk of further Red Goshawk impact trigger exceedances, the Minister can require the approval holder to implement monitoring and management measures consistent with best practice and relevant scientific evidence as prescribed by the Minister.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>Bird and Bat Management – BBMP reporting requirements to the department</b>			
50.	<p>The BBMP must include commitments to report the following information (in the timeframes specified below) in each compliance report required under condition 58. Each compliance report must include:</p> <ol style="list-style-type: none"> <li>annual turbine strike of each turbine for EPBC Act listed bird and bat species;</li> <li>total turbine strike of each turbine since commissioning;</li> <li>a compilation and analysis of the information in relation to each turbine strike regarding: <ol style="list-style-type: none"> <li>the species detected;</li> <li>the method of detection;</li> <li>the estimated time of the collision;</li> </ol> </li> <li>prevailing environmental/meteorological conditions at the estimated time of the collision; and iv. likely factors in the presence of the EPBC Act listed bird and bat species;</li> <li>estimations of annual mortality and injury rate for each relevant EPBC Act listed bird and bat species, including;</li> <li>supporting evidence from case studies of EPBC Act listed bird and bat species carcass size classes;</li> <li>results of persistence trials;</li> <li>searcher efficiency trials;</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>





Condition number	Condition	Compliance designation	Discussion / evidence
	<ul style="list-style-type: none"> <li>h. substitute carrion trials;</li> <li>i. annual probability of detection and monthly strike monitoring;</li> <li>j. species occurrence records: <ul style="list-style-type: none"> <li>i. in accordance with the currently authorised version of the department's Guidelines for biological survey and mapped data (2018 version available at: <a href="https://www.awe.gov.au/sites/default/files/documents/guidelinesbiological-survey-mapped-data.pdf">https://www.awe.gov.au/sites/default/files/documents/guidelinesbiological-survey-mapped-data.pdf</a>);</li> <li>ii. using the species observation data template on the department's website (sensitive ecological data must be identified and treated in accordance with the department's Sensitive Ecological Data – Access and Management Policy V1.0 (2016) available at <a href="https://www.awe.gov.au/sites/default/files/documents/sensitiveecological-data-access-mgt-policy.pdf">https://www.awe.gov.au/sites/default/files/documents/sensitiveecological-data-access-mgt-policy.pdf</a> or subsequent official revision);</li> </ul> </li> <li>k. annually evaluate the effectiveness of the measures implemented to avoid and mitigate mortality and/or injury to EPBC Act listed bird and bat species, including: <ul style="list-style-type: none"> <li>i. reporting on the steps taken and outcomes of implementing the adaptive management procedure; and</li> <li>ii. an assessment of their likely effectiveness, and performance in preventing reaching of Red Goshawk trigger, White-throated Needle-tail impact trigger 1 and White-throated Needle-tail impact trigger 2.</li> </ul> </li> </ul>		
51.	<p>From 5 years after commissioning, the approval holder must compile all information required under condition 50 from the previous 5 years in every 5th compliance report required under condition 50 until the completion of the action.</p> <p>Note: the department may publish the information required under condition 50 submitted as part of the compliance reports on the department's website.</p>	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – commissioning milestone has not elapsed; the BBMP is being progressed however is yet to be approved.</li> </ul>
<b>PART B – ADMINISTRATIVE CONDITIONS</b>			
<b>Notification of date of commencement of the action</b>			
52.	The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	<ul style="list-style-type: none"> <li>• Notice of commencement letter dated 25/9/24 (Appendix B, item 5) specifies commencement date of 16/9/24.</li> </ul>
53.	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – action has commenced.</li> </ul>
<b>Compliance records</b>			
54.	The approval holder must maintain accurate and complete compliance records.	Compliant	<ul style="list-style-type: none"> <li>• Accurate and complete compliance records, as described by this report and listed in Appendix B, are retained on-file.</li> </ul>
55.	<p>If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.</p> <p>Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and/or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media.</p>	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – request has not been made.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
<b>Submission and publication of plans</b>			
56.	The approval holder must: <ol style="list-style-type: none"> <li>submit plans electronically to the department for approval by the Minister;</li> <li>publish each plan on the website within 20 business days of the date the plan is approved by the Minister or on the date a revised action management plan is submitted to the Minister or the department, unless otherwise agreed to in writing by the Minister;</li> <li>exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and</li> <li>keep plans published on the website until the end date of this approval.</li> </ol>	Compliant	<ol style="list-style-type: none"> <li>Ministerial approval of plans (Appendix B, items 1 and 2) demonstrate plans were successfully transmitted.</li> <li>Email correspondence (Appendix B, item 155) documents the publishing of Project MNES MP and OAMP to the Project website on 3/9/24, being 18 business days from receipt of first approval on 8/8/24 (Appendix B, item 1).</li> <li>Sensitive information has been redacted, evidence: published plans available at: <a href="https://lotuscreekwindfarm.com.au/about-us/library/">https://lotuscreekwindfarm.com.au/about-us/library/</a>.</li> <li>Plans accessed online 19/9/25 at: <a href="https://lotuscreekwindfarm.com.au/about-us/library/">https://lotuscreekwindfarm.com.au/about-us/library/</a>.</li> </ol>
57.	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions of this approval, is prepared in accordance with the department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the department as part of the subsequent compliance report required under condition 58 and published on the approval holder's website (excluding sensitive ecological data) within 10 business days of the compliance report submission to the department, for the remaining duration of the approval.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – (this) first annual compliance report is yet to be published.</li> </ul>
<b>Annual compliance reporting</b>			
58.	The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: <ol style="list-style-type: none"> <li>publish each compliance report on the website within 60 business days following the relevant 12 month period;</li> <li>notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication;</li> <li>keep all compliance reports publicly available on the website until this approval expires;</li> <li>exclude or redact sensitive ecological data from compliance reports published on the website; and</li> <li>where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – (this) first compliance report has been prepared and finalised within the timeframes of the approval however is yet to be submitted / published at time of writing.</li> </ul>
<b>Reporting non-compliance</b>			
59.	The approval holder must notify the department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify: <ol style="list-style-type: none"> <li>any condition which is or may be in breach;</li> <li>a short description of the incident and/or non-compliance; and</li> <li>the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.</li> </ol>	Compliant	<p>One reportable non-compliance occurred under this condition within the reporting period were identified by this audit:</p> <ul style="list-style-type: none"> <li>A legally binding mechanism to secure offset areas having not been executed within the timeframe nominated by Condition 7d of EPBC 2020/8867.               <ul style="list-style-type: none"> <li>Notification of the occurrence was submitted to DCCEEW on 15/9/25. The notification letter (Appendix B, item 21) stated compliance with the specified notification timeframe and including details as specified by the criteria.</li> </ul> </li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
60.	The approval holder must provide to the department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: <ol style="list-style-type: none"> <li>any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</li> <li>the potential impacts of the incident or non-compliance; and</li> <li>the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – no follow up information pertaining to the notifiable event remained outstanding as at the end of the reporting period (16/9/25).</li> </ul>
<b>Independent audit</b>			
61.	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – request has not been made.</li> </ul>
62.	For each independent audit, the approval holder must: <ol style="list-style-type: none"> <li>provide the name and qualifications of the independent auditor and the draft audit criteria to the department;</li> <li>only commence the independent audit once the audit criteria have been approved in writing by the department; and</li> <li>submit an audit report to the department within the timeframe specified in the approved audit criteria.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – request has not been made.</li> </ul>
63.	The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – request has not been made.</li> </ul>
<b>Revision of management plans</b>			
64.	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RMP) then, from the date specified, the approval holder must implement the RMP in place of the previous action management plan.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – management plans have not been revised following receipt of Ministerial approval.</li> </ul>
65.	The approval holder may choose to revise an action management plan approved by the Minister under condition 10, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RMP would not be likely to have a new or increased impact.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered - management plans have not been revised following receipt of Ministerial approval.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
66.	<p>If the approval holder makes the choice under condition 65 to revise an action management plan without submitting it for approval, the approval holder must:</p> <ol style="list-style-type: none"> <li>notify the department in writing that the approved action management plan has been revised and provide the department with: <ol style="list-style-type: none"> <li>an electronic copy of the RMP;</li> <li>an electronic copy of the RMP marked up with track changes to show the differences between the approved action management plan and the RMP;</li> <li>an explanation of the differences between the approved action management plan and the RMP;</li> <li>the reasons the approval holder considers that taking the action in accordance with the RMP would not be likely to have a new or increased impact; and</li> <li>written notice of the date on which the approval holder will implement the RMP (RMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the department.</li> </ol> </li> <li>subject to condition 68, implement the RMP from the RMP implementation date and for the remaining duration of the approval.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – management plans have not been revised following receipt of Ministerial approval.</li> </ul>
67.	<p>The approval holder may revoke their choice to implement a RMP under condition 65 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 65, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 65.</p>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – management plans have not been revised following receipt of Ministerial approval.</li> </ul>
68.	<p>If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RMP would be likely to have a new or increased impact, then:</p> <ol style="list-style-type: none"> <li>condition 65 does not apply, or ceases to apply, in relation to the RMP; and</li> <li>the approval holder must implement the action management plan specified by the Minister in the notice.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – management plans have not been revised following receipt of Ministerial approval.</li> </ul>
69.	<p>At the time of giving the notice under condition 68, the Minister may also notify that for a specified period of time, condition 65 does not apply for one or more specified action management plans.</p> <p>Note: conditions 65, 66, 67, and 68 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval.</p>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – management plans have not been revised following receipt of Ministerial approval.</li> </ul>
<b>Modifications to SARA decision notice</b>			
69A.	<p>The approval holder must notify the department in writing of any proposed change to the SARA Decision notice – Lotus Creek Wind Farm that may directly or indirectly relate to protected matters within 2 business days of formally proposing a change and within 5 business days of becoming aware of any proposed change.</p>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – changes to the SARA Decision notice made following EPBC 2020/8667 approval do not relate to protected matters, evidence: <ul style="list-style-type: none"> <li>2411-4300 SPD – RE3-N Changed decision notice available at: <a href="https://www.planning.qld.gov.au/planning-framework/state-assessment-and-referral-agency/sara-application-material">https://www.planning.qld.gov.au/planning-framework/state-assessment-and-referral-agency/sara-application-material</a></li> </ul> </li> </ul>
69B.	<p>The approval holder must notify the department in writing of any change to the SARA Decision notice – Lotus Creek Wind Farm conditions that may directly or indirectly relate to protected matters, within 10 business days of a change to conditions being finalised. This notification must include a copy of the finalised changes to the SARA Decision notice – Lotus Creek Wind Farm conditions.</p>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – as above for condition 69A.</li> </ul>
<b>Completion of the action</b>			



Condition number	Condition	Compliance designation	Discussion / evidence
70.	Within 30 days after the completion of the action, the approval holder must notify the department in writing and provide completion data.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – action not completed.</li> </ul>
<b>PART C – DEFINITIONS</b>			
NA	NA	NA	<ul style="list-style-type: none"> <li>Compliance action not triggered by definitions.</li> </ul>
<b>ATTACHMENTS</b>			
A.	<b>Figures A and A1-28</b>	NA	<ul style="list-style-type: none"> <li>Project maps – compliance action not triggered.</li> </ul>
B.	<b>Environmental Offsets</b> Each OAMP must include: <ol style="list-style-type: none"> <li>a summary of the residual impacts to Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat that will be compensated for by the environmental offsets. This summary must include the final impact area to be offset for Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat at all impact sites which the particular offset is to address;</li> <li>details of the management actions, and timeframes for implementation, to be undertaken to achieve the offset completion criteria specified in the OAMP as required under condition 5, including but not limited to; <ol style="list-style-type: none"> <li>interim milestones that set targets at 5-yearly intervals for progress towards achieving the offset completion criteria;</li> <li>details of the nature, timing and frequency of monitoring to inform progress against achieving the 5-yearly interim milestones and maintaining improvements of habitat quality (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the environmental offset is likely to achieve those milestones in adequate time to implement any necessary corrective actions);</li> <li>timing for the implementation of corrective actions if monitoring activities indicate the interim milestones will not be, or have not been, achieved;</li> </ol> </li> <li>a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OAMP and timely achievement of the offset completion criteria, including weed and feral animal management, management of potential wild fires and a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix (Attachment C);</li> <li>evidence of how the management actions and corrective actions take into account relevant approved conservation advices and are consistent with relevant recovery plans and threat abatement plans.</li> <li>a description of the environmental offset site(s), including location, size, condition, environmental values present and surrounding land uses;</li> <li>the mechanism by which the environmental offset site(s) will be secured;</li> <li>baseline data, including results from field validation surveys, and quantifiable ecological data on habitat quality, and other supporting evidence, that documents the presence of Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat and the quality of Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat within the impact sites and environmental offset site(s);</li> <li>details of how the environmental offset will provide connectivity with other habitats, populations and biodiversity corridors and/or will contribute to a larger strategic offset for</li> </ol>	Compliant	<ul style="list-style-type: none"> <li>The OAMP approval letter dated 9/8/24 (Appendix B, item 2) demonstrates the Ministers satisfaction that the OAMP meets the approval criteria.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
	<p>Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat;</p> <p>g. maps and shapefiles to clearly define the location and boundaries of the environmental offset site(s), accompanied by offset attributes; and</p> <p>h. specific offset completion criteria derived from the site habitat quality to demonstrate the improvement in the quality of Koala habitat, Squatter Pigeon breeding habitat, Squatter Pigeon foraging habitat, and Greater Glider habitat within the environmental offset sites over the period of effect of this approval required to meet the requirements of the Environmental Offsets Policy.</p>		
C	<b>Risk assessment matrix</b>	NA	<ul style="list-style-type: none"> <li>Reference material only.</li> </ul>
D	<p><b>MNES Management Plan Requirements</b></p> <p>The MNES Management Plan must:</p> <p>a. include measures to ensure that MNES are not injured in the clearance of the development footprint;</p> <p>b. include a commitment ensuring a fauna spotter-catcher will be present during all habitat clearance activities, with the authority to cease habitat clearance for an appropriate timeframe where one or more EPBC Act listed threatened species and/or EPBC Act listed migratory species could be impacted and must include:</p> <p>i. canopy searches for Koalas;</p> <p>ii. canopy and suitably sized tree hollow inspections for Greater Gliders; and</p> <p>iii. flushing for Squatter Pigeons in potential Squatter Pigeon habitat.</p> <p>c. ensure Greater Gliders can move between habitat fragmented within the development footprint, by:</p> <p>i. including a commitment to install glider poles in Greater Glider habitat where clearing widths for roads is such that distance between trunks of &gt;30cm DBH trees is 1.2 times the canopy height, or less, to allow Greater Gliders to move between trees;</p> <p>ii. ensuring sections of road in Greater Glider habitat have a cleared width of no more than 15 m for a minimum length of 50 m. One section of 15 m wide road is required per 500 m of Greater Glider Habitat fragmented by the development footprint; and</p> <p>iii. including a commitment to mitigate Greater Glider habitat loss by ensuring all potential Greater Glider hollows to be cleared as a result of the action are relocated to Greater Glider habitat in areas of retained vegetation or revegetated habitat within the project site, or the Greater Glider offset site to provide additional habitat. The approval holder must undertake the salvage and relocation of Greater Glider hollows according to the conditions detailed in Attachment E.</p> <p>d. include a monitoring program to assess the utilisation of glider poles and salvaged hollows across the development footprint. The monitoring program must:</p> <p>i. identify criteria for assessing Greater Glider use of glider poles and salvaged Greater Glider hollows;</p> <p>ii. ensure that glider poles are installed correctly according to best practice information and can be used by Greater Gliders to cross fragmented Greater Glider habitat in the development footprint;</p> <p>iii. detail the timing and frequency of monitoring; and</p> <p>iv. detail site and other relevant characteristics for each glider pole in the development footprint and whether there was evidence of use by Greater Gliders to cross road clearings.</p>	Compliant	<ul style="list-style-type: none"> <li>The MNES MP approval letter dated 8/8/24 (Appendix B, item 1) demonstrates the Ministers satisfaction that the MNES MP meets the approval criteria.</li> </ul>



Condition number	Condition	Compliance designation	Discussion / evidence
	<ul style="list-style-type: none"> <li>e. specify management measures for controlling bushfires in the project site and preventing bushfires resulting from the action from entering into the Clarke- Connors Ranges and impacting on MNES outside of the project site;</li> <li>f. include a commitment to rehabilitate all temporary clearance areas, including, but not limited to road shoulders, within 6 months of completion of construction with local native flora species to minimise erosion and sediment run-off;</li> <li>g. detail potential changes in project site utilisation by the EPBC Act listed bird and bat species during construction;</li> <li>h. detail measures, and timeframes for implementation, that will be taken in the project site during the construction phase to avoid, mitigate and manage impacts of the project on EPBC Act listed bird and bat species;</li> <li>i. specify management measures for controlling sediment run-off and erosion associated with the action to avoid impacting on MNES including, but not limited to Koala habitat, Squatter Pigeon habitat, Greater Glider habitat;</li> <li>j. include native flora species in the Erosion and Sediment Control Plan to be implemented under condition 30 in the SARA Decision notice – Lotus Creek Wind Farm;</li> <li>k. specify weed and pest management measures associated with the action;</li> <li>l. include a commitment to ensure that weeds and pest animals (e.g. rabbits) are not spread as a result of the action, into the bordering Clarke- Connors Ranges located outside of the project site, and impact on MNES within the Clarke- Connors Ranges;</li> <li>m. include a commitment to ensure that feral predator populations (including, but not limited to foxes, cats, pigs and dogs) do not increase in the region as a result of increased carcass numbers from turbine strike associated with the action and impact on MNES located inside and outside of the project site;</li> <li>n. provide links to other plans or conditions of approval (including conditions in the SARA Decision notice – Lotus Creek Wind Farm);</li> <li>o. detail specific timing, frequency and duration of the measures to be implemented;</li> <li>p. include evidence of how the measures are based on best available practices, appropriate standards, and supported by scientific evidence;</li> <li>q. include details on how the measures have been developed with consideration of the S.M.A.R.T principle;</li> <li>r. include a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the MNES Management Plan and timely achievement of the environmental outcomes, including a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix (Attachment C); and</li> <li>s. provide evidence of how the measures and corrective actions take into account relevant approved conservation advice and are consistent with relevant recovery plans and threat abatement plans.</li> </ul>		





Condition number	Condition	Compliance designation	Discussion / evidence
E	<p><b>Protocol for salvaging Greater Glider hollows</b></p> <p>The approval holder must undertake the salvage and relocation of Greater Glider hollows according to the following conditions.</p> <p>Prior to clearing the approval holder must:</p> <ol style="list-style-type: none"> <li>ensure all Greater Glider hollows to be cleared as a result of the action are inspected for Greater Gliders;</li> <li>ensure the use of techniques to encourage Greater Gliders to leave their hollows prior to removal of any tree, including tapping trees and using spotlights. If Greater Gliders are potentially present, trees must be dismantled in sections;</li> <li>ensure that the height and orientation of the Greater Glider hollow and the species of tree it is derived from must be recorded prior to the salvaging of the hollows;</li> <li>install Greater Glider hollows in the relocation site at a similar orientation, height and tree species as recorded in the above condition;</li> <li>determine the depth and height of the Greater Glider hollows prior to salvage operation and retained in the salvage operation;</li> <li>ensure after harvesting, the Greater Glider hollows are sealed to weather- proof the hollow;</li> <li>ensure the excised hollows are deep enough to enable the addition of insulation material;</li> <li>commit to using the sawdust from the harvesting of the tree hollow as insulation in the base of the harvested Greater Glider hollows. Insulation material at the base of the hollow must be at least as deep as the thickness of the sides of the hollow. Additional insulation may be required;</li> <li>ensure Greater Glider hollow removal and installation is undertaken by trained arborists;</li> <li>commit to ensuring host trees, which Greater Glider hollow will be installed, are protected from ring-barking;</li> <li>monitor Greater Glider hollows to detect evidence of Greater Glider use and monitoring results are to be included in the annual compliance report under condition 58.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – no Greater Glider hollows, as defined by EPBC 2020/8867 Part C, have been identified by Greater Glider surveys undertaken within potential Greater Glider habitat. <ul style="list-style-type: none"> <li>The MNES Greater Glider Spotlighting Survey Report (Appendix B, item 22) documents surveys undertaken to identify Greater Glider hollows and associated findings.</li> <li>Spatial data showing the clearing extent up to 19/8/25 (Appendix B, item 18) shows no clearing has been undertaken within potential Greater Glider habitat outside of that which is covered by the above survey report.</li> <li>For consistency with approved habitat mapping and the projects avoidance requirements, nine (9) trees were identified during ecological and pre-clearance surveys for OHTL activities, as hosting potential Greater Glider hollows however showed no signs of Greater Glider use and therefore do not meet the definition of confirmed Greater Glider hollows. All nine (9) trees were located outside and mapped as confirmed or potential Greater Glider habitat areas, consistent with habitat mapping and avoidance requirements (Appendix B, item 89).</li> <li>All construction activities have not disturbed identified Greater Glider habitat, meaning that all mapped habitat remains undisturbed. No salvage or relocation of Greater Glider hollows has occurred during this reporting period (Appendix B, items 22, 89 and 108-117).</li> <li>No Greater Glider habitat trees were taken, cleared, or disturbed resulting from overhead transmission line construction works. Therefore, the installation or availability of nestboxes has not been required to date supported by data in the FSC Pre Clearance Survey Report (Appendix B, items 89).</li> </ul> </li> </ul>



### 3.2 Management Plans Compliance

The assessment demonstrating that the requirements of plans required under the approval have been implemented included the following plans:

- OAMP;
- MNES MP.

Note that BBMP has not yet been approved. Approval of the BBMP is required prior to commissioning.

Assessments of requirements of plans (OAMP and MNES MP) are provided in **Table 3.4** and **Table 3.5** respectively. Commitments within these tables have been collated where required to reduce repetition, however, are comprehensive of action required by the plans.

Assessment was undertaken against a total of 139 individual items for the plans. The assessment found that 81 commitments had been implemented, 1 resulted in a non-compliance, and 57 commitments were not applicable. A summary is provided in **Table 3.3**.

Table 3.3: Summary of compliance results – management plans

Total commitments	Total non-applicable commitments	Total applicable commitments	# compliant	# non-compliant
139	57	82	81	1



Table 3.4: OAMP Compliance Assessment

Item	Requirement	Compliance designation	Discussion / evidence
<b>Legal mechanism</b>			
1.	The offset area will be secured through a voluntary declaration under the Vegetation Management Act 1999 (VM Act) within 12 months after the commencement of the Action (as per CoA 7d).	Non-compliant	<ul style="list-style-type: none"> <li>Refer to Table 3.2 Condition 7(d).</li> </ul>
2.	Lotus Creek Wind Farm Pty Ltd will notify and provide evidence to the department within 5 business days of any environmental offset area being secured.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the legal mechanism was not secured within the reporting period.</li> </ul>
3.	Where the offset area is secured via an on-title agreement will secure the site within 20 years of commencement of the action.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the legal mechanism was not secured within the reporting period.</li> </ul>
<b>Interim milestones and completion criteria</b>			
4.	5 yearly habitat quality and weed and pest interim milestones - various	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the first five (5) yearly milestone has not elapsed.</li> </ul>
5.	Once the completion criteria have been met, habitat quality will be maintained or improved for the duration of the approval (until 30 September 2077)	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the offset completion criteria are yet to be achieved.</li> </ul>
<b>Management Actions</b>			
<b>Bushfire management</b>			
6.	Management measures - various	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
7.	<p>Controlled burns will be undertaken to avoid impacts to specific habitat features for MNES values. This includes, but is not limited to planning burns:</p> <ul style="list-style-type: none"> <li>Outside of squatter pigeon peak-breeding period (April to October) (Squatter Pigeon Workshop 2011) or where squatter pigeons have been observed nesting;</li> <li>When native grasses are not seeding to avoid impacts to food and nesting resources of Squatter Pigeon.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
<b>Livestock exclusion and management</b>			
8.	Management measures - various	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
<b>Feral animal control</b>			
9.	Management measures - various	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
10.	<p>Pest monitoring:</p> <ul style="list-style-type: none"> <li>Camera trap monitoring to generate an activity index for target vertebrate pest fauna will be undertaken across the offset area at five yearly intervals for the duration of the approval. This monitoring will follow the same methodology outlined in Section 3.7.1 of the OAMP.</li> <li>Additional monitoring will be undertaken during the implementation of pest management activities. This data will be analysed to assess the appropriateness of the scale and frequency of pest management activities to ensure that threats are appropriately managed (i.e. the results of each round of management activities will be recorded and compared with previous activities to assess changes in pest numbers).</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the first five (5) yearly interval for pest monitoring have not elapsed.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
11.	No European red foxes were detected during the baseline survey program. If this species, or other pest species that may directly impact MNES, are detected in future monitoring rounds, they will be added to the list of target pest fauna for ongoing management and control.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the first five (5) yearly interval for pest monitoring have not elapsed.</li> </ul>
<b>Weed management</b>			
12.	Management measures – various	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
13.	Weed monitoring: <ul style="list-style-type: none"> <li>Weed monitoring is undertaken at 5 yearly intervals for the duration of the approval.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the first five (5) year monitoring milestone has not elapsed.</li> </ul>
14.	Weed hygiene protocols will be implemented for plant and equipment brought into the offset area and include: <ul style="list-style-type: none"> <li>Vehicle wash-downs shall be undertaken in accordance with clean-down procedures, guidelines and checklist detailed by Biosecurity Queensland, in particular the Vehicle and Machinery Checklists - Clean-down procedures (Biosecurity Queensland, 2014).</li> <li>Washdown all vehicles and machinery prior to entry of the offset area. Vehicles must retain a valid weed hygiene certificate whilst on site. Vehicle washdown procedures have been outlined in Table 9.10.</li> <li>The movement of vegetation and soil within the offset area will be prohibited.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Access to the offset areas is managed by the EPC Contractor.</li> <li>The CEMP (Appendix B, item 36) requires pre-mobilisation weed and seed declaration for all vehicles, plant and equipment prior to site access whereby washdowns are carried out offsite with an onboarding inspection conducted prior to site entry by a suitably qualified person (SQP). Vehicles / plant / equipment failing the onboarding inspection are refused entry to site.</li> <li>Example completed plant and equipment onsite inspection records (Appendix B, items 40-44 and 185-191) include photographs and completed checklists developed in accordance with <i>Vehicle and Machinery Checklists – Clean-down procedures</i> (Biosecurity Queensland, 2014).</li> </ul>
<b>Additional management actions</b>			
15.	Management measures - various	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
16.	Vegetation clearing within the offset area will not reduce the total area of future MNES habitat and is only permitted under the following circumstances: <ul style="list-style-type: none"> <li>Ongoing maintenance of all pre-existing access tracks, firebreaks and fence;</li> <li>Weed management actions; and</li> <li>Ensuring public safety or as directed by emergency management response person-nel in the event of uncontrolled fire or another emergency procedure.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Offset Options Deed executed by the Landowners provide conditions for protection of and access to the offset sites (Appendix B, items 240 and 241).</li> </ul>
17.	No timber harvesting and/or firewood collection is permitted within the offset area.	Compliant	<ul style="list-style-type: none"> <li>Offset Options Deed executed by the Landowners provide conditions for protection of and access to the offset sites (Appendix B, items 240 and 241).</li> </ul>
18.	No harvesting of vegetation for fodder is permitted within the offset area.	Compliant	<ul style="list-style-type: none"> <li>Offset Options Deed executed by the Landowners provide conditions for protection of and access to the offset sites (Appendix B, items 240 and 241).</li> </ul>
<b>Monitoring and reporting</b>			
<b>Monitoring</b>			
19.	The monitoring program must provide / include: <ul style="list-style-type: none"> <li>'early-control' function, that is to have confidence that management actions are effective for achiev-ing the offset completion criteria.</li> <li>'early warning' function, so as to inform timely decisions on corrective actions to ensure completion criteria are achieved through the assessment of results against interim milestones.</li> <li>Specific, measurable, achievable, relevant and timed (SMART) monitoring criteria.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
20.	<p>Habitat quality surveys:</p> <ul style="list-style-type: none"> <li>The 'condition component' of the Modified Habitat Quality Assessment method (BioCondition survey method) will be used to monitor habitat quality gains at permanent monitoring sites for the duration of the approval.</li> <li>Habitat quality monitoring will be undertaken every five years and compared against interim milestones until completion criteria have been achieved, and thereafter every ten years for the duration of the approval.</li> <li>Habitat quality surveys will be undertaken at each of the permanent habitat quality scoring and BioCondition sites.</li> <li>As per methods presented in Section 4, field survey results will be compared against benchmark data for each Regional Ecosystem.</li> <li>The layout and data collection methods will be consistent at each monitoring round allowing for a robust comparison of results.</li> <li>Results will be analysed for each Assessment Unit, as well as the overall weighted habitat quality score for the offset area, to assess for changes over time.</li> <li>The weighted habitat quality score will incorporate data from weed and pest monitoring (presented in Section 10.4) to inform species-specific criteria including threats to species and species mobility capacity.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Criteria relating to five (5) yearly monitoring not triggered – the first five (5) yearly milestone has not elapsed.</li> </ul>
21.	<p>Hollow bearing tree (HBT) surveys:</p> <ul style="list-style-type: none"> <li>Within 12 months of commencement of the action, a survey of the offset areas mapped as Greater Glider habitat will be undertaken to identify the number of HBTs present.</li> <li>The survey will involve a direct count of HBTs and continue until at least 296 HBTs have been identified.</li> <li>HBT data will be reported in the 5-yearly monitoring report and will be repeated with each 5-yearly monitoring event.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Baseline HBT surveys in accordance with the criteria are documented as taking place between 17 to 21 March 2025 (within 12 months of the commencement of the action being 16/9/24), within the LCWF Offset Baseline Report (Appendix B, item 23), which documents a direct count of 316 HBTs.</li> <li>The five (5) year from commencement milestone has not elapsed, therefore requirements pertaining to monitoring and reporting at this interval are not applicable.</li> </ul>
22.	<p>Weed and pest fauna surveys:</p> <ul style="list-style-type: none"> <li>Weed and pest fauna surveys will be repeated at the same locations established during baseline monitoring following the methods as outlined in Section 3.7.1 and 3.7.2 and will be repeated with each 5-yearly monitoring event.</li> <li>In addition to the 5-yearly monitoring, monitoring will be undertaken each time weed and pest management activities are undertaken.</li> <li>Data for each of the components of habitat quality scoring will be collected at each site and reported on and presented in a sequential manner (including previous data collected) to assess progress towards interim milestones.</li> <li>Weed and pest data will be assessed against interim milestones in the same manner as habitat quality scoring.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the five (5) yearly monitoring and reporting timeframe has not elapsed, commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
23.	<p>Annual inspections of the offset area will be undertaken to assess:</p> <ul style="list-style-type: none"> <li>Condition of fencing and infrastructure to control livestock access to the offset area.</li> <li>Condition of access tracks and fire breaks to identify areas for erosion control or remediation.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the proponent is unable to implement on-ground management actions until the offset area has been legally secured.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
<b>Reporting</b>			
24.	Monitoring and reporting will be undertaken at five yearly intervals, with the first report due five years after the commencement of the action and continue for the duration of the approval. 5-yearly monitoring report contents – various.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – milestone timeframe has not elapsed.</li> </ul>
<b>Corrective actions and adaptive management</b>			
25.	<p>If a monitoring report identifies that an interim milestone has not been achieved, then the following steps will be followed to identify which corrective actions will be undertaken:</p> <ul style="list-style-type: none"> <li>Within one month of detecting the failure to meet an interim milestone, an investigation into the reasons why the milestone or completion criteria were not achieved will be undertaken. This investigation will include a comparison of the improvements/deteriorations in raw data related to the specific milestone in question.</li> <li>Within six months of detecting the failure to meet an interim milestone, appropriate corrective action(s) as discussed in Table 11.1 will be implemented.</li> <li>Within six months after detecting the failure to meet an interim milestone, a review of all current management actions and corrective actions will be undertaken to ensure that they are fit for purpose, and capable of correcting the identified noncompliance. This process will be incorporated into the review of the OAMP discussed further in Section 12.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
26.	If structured monitoring or opportunistic observations indicate that a risk has been realised, a basic action plan is to be prepared identifying appropriate corrective actions to rectify the event or circumstance. Where any part of proposed interim milestones have not been achieved, a list of recommended corrective actions required to keep the offset site on track to meet future interim milestones and completion criteria amendments to the current OAMP, including and any changes to management and monitoring methods will be proposed within 3 months.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – commencement of works was pending execution of legally binding mechanism to secure the offset area.</li> </ul>
<b>Offset program completion</b>			
27.	<p>Within 40 business days of the 20th anniversary of the commencement of the action the following will be submitted to the department:</p> <ul style="list-style-type: none"> <li>A report detailing the area and condition of Koala habitat, Squatter Pigeon breeding habitat, Squat-ter Pigeon foraging habitat, and Greater Glider habitat the offset area(s).</li> <li>Notification in writing of any completion criteria that have not been achieved and the reasons that these criteria have not been met.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – milestone timeframe has not elapsed.</li> </ul>
28.	If any completion criterion have not been achieved within the 20th anniversary of the commencement of the action, an OAMP to address the shortfall in environmental offsets consistent with the Environ-mental Offsets Policy will be submitted to the department for the Minister's approval. This approved OAMP, or any subsequent version of the OAMP approved by the Minister in writing, will be implemented for the remaining duration of the approval.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – milestone timeframe has not elapsed.</li> </ul>



Table 3.5: MNES MP Compliance Assessment

Item	Requirement	Compliance designation	Discussion / evidence
<b>Adaptive management and continuous improvement</b>			
29.	Plan reviews will be undertaken as a minimum every three years.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered; three (3) years has not elapsed since the date of the current version (23/7/2024).</li> </ul>
30.	Triggers for plan review include (but are not limited to): <ul style="list-style-type: none"> <li>A reportable incident as defined in the Conditions of Approval (CoA).</li> <li>Mortality or injury of EPBC Act listed flora or fauna.</li> <li>Identification of an EPBC Act matter on site not listed under this Plan.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered; triggers for MNES MP review have not been realised.</li> </ul>
31.	A suitably qualified person will draft any amended management measures or monitoring, including training of personnel, data analysis, interpretation, and reporting.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered; triggers for MNES MP review have not been realised.</li> </ul>
32.	Any updates to the Plan will include evaluation of environmental management performance against the Plan's objectives and performance targets, and subsequent review and regulatory approval of revised versions of the Plan. This will include: <ul style="list-style-type: none"> <li>An updated risk assessment, including in response to changing circumstances or in light of the results from implementing contingency response/corrective actions.</li> <li>Review the effectiveness of management measures.</li> <li>Identification of areas for improvement of environmental management and performance.</li> <li>Assessment the cause or causes of non-conformances and deficiencies.</li> <li>Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.</li> <li>Assessment of the effectiveness of the corrective and preventative actions.</li> <li>Documentation any changes in procedures.</li> <li>Assess attainment of the Plan's environmental objectives against the performance indicators.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered; triggers for MNES MP review have not been realised.</li> </ul>
<b>Design / location of infrastructure for avoidance / impact minimisation</b>			
33.	Avoidance and minimisation of potential impacts to MNES through the design and layout of Project infrastructure will continue to be refined as the Project progresses with the following priorities: <ol style="list-style-type: none"> <li>Minimising clearing within the riparian vegetation community (which also incorporates core Greater Glider habitat).</li> <li>Minimising clearing within high value Greater Glider mixed Eucalyptus Woodland.</li> <li>Final detailed design of road and overhead powerline alignments to minimise the overall clearing footprint to the greatest, whilst also reducing the overall loss of Koala and Greater Glider habitat.</li> </ol>	Compliant	<ul style="list-style-type: none"> <li>Construction has proceeded in accordance with approved design, and clearing footprint minimised through pre-clearance surveys.</li> </ul>
34.	Micro-siting: <ul style="list-style-type: none"> <li>of infrastructure (i.e. underground cable alignment) to minimise direct impacts to active nests, hollows and other habitat features in use by a threatened species.</li> <li>of turbines, roads, underground cabling and other infrastructure to reduce or avoid ecological impacts.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered; construction has proceeded in accordance with approved design.</li> </ul>





Item	Requirement	Compliance designation	Discussion / evidence
35.	Locate temporary infrastructure outside mature vegetation (to mitigate impacts to Greater Glider)	Compliant	<ul style="list-style-type: none"> <li>Cleared spatial data (Attachment B, item 22) demonstrates vegetation clearing within Greater Glider habitat is limited to the EPBC approved development footprint.</li> <li>Project design spatial data (Appendix B, item 156), Greater Glider habitat mapping (Attachment B, item 157) and publicly available satellite imagery confirms temporary infrastructure (construction camp, compounds, laydown areas etc.) are located outside of Greater Glider habitat or otherwise within the approved disturbance footprint (within which vegetation clearing is approved).</li> </ul>
<b>Pre-clearance assessment</b>			
36.	<p>A permit to disturb system is to be implemented for all works in the disturbance area to ensure:</p> <ul style="list-style-type: none"> <li>Pre-clearance surveys for a particular area are completed prior to works in that area commencing.</li> <li>GPS and mapping is available and relevant for all plant operators and plant machinery.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The Contractor's Construction Environmental Management Plan (CEMP) (Appendix B, item 36) requires a VDP to be approved by the Contractor Environmental Representative prior to any works involving disturbance to flora, fauna or heritage values.</li> <li>VDPs (Appendix B, items 13-17 and 161-165) require ecological pre-clearance surveys, document surveys completed and provide maps showing the work area extent.</li> <li>The LCWF Monthly Report for August 25 (Appendix B, item 35) documents 30 VDPs raised for the 12-month period commencing September 2024. The VDP / Pre-clearance register (Appendix B, item 178) tracks pre-clearance surveys undertaken against VDPs issued.</li> <li>LCWF Monthly Reports for the period September 24 to August 25 (Appendix B, items 24-35) documents progressive issue of VDPs throughout the reporting period.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>VDPs (Appendix B, items 13-17 and 161-165) require pre-clearance surveys be undertaken, spatial data for work area extent shown to be loaded into the machine control GPS for machines completing clearing activities and include a process for sign off by responsible personnel confirming all VDP requirements have been met.</li> <li>Photographs provided of Trimble GPS on board vegetation clearing plant (Appendix B, items 158 and 159) demonstrate that disturbance footprint data is loaded to machines.</li> <li>Drone pre-clearance surveys completed in January 2025 (Appendix B, items 89 and 90) and as reported in their Project Monthly Report to the Project owner (Appendix B, item 78).</li> <li>Clearing and disturbance requirements outlined in the CEMP (Appendix B, item 36) through Environmental Works Plan (EWP) (Appendix B, items 83–87) which includes specific management actions, relevant clearing area boundaries and maps. The requirements have been executed via a Permit to Disturb – Works Procedure (Appendix B, items 79–82). Each individual Permit to Disturb references the relevant stages (1 to 4) of the EWP, relevant sections of the CEMP, complete with a Personnel Sign-on acknowledgement page.</li> <li>Photographs of the Trimble GPS on board plant provides evidence of the spatial footprint data loaded to GPS in a vegetation clearing machine (Appendix B, item 88).</li> </ul>
37.	Areas where clearing, earthworks and/or alterations to a waterway corridor (i.e. construction of bridges, culverts, etc.) will be required are identified.	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>EWP (Appendix B, items 83–87) identifies management actions for waterways/watercourse, as referenced in each Permit to Disturb.</li> </ul>
38.	A pre-clearance desktop assessment to identify potential impacts is completed.	Compliant	<ul style="list-style-type: none"> <li>VDPs (Appendix B, items 13-17 and 161-165) require information pertaining to the presence of ecological values impacted by the work obtained via desktop assessment.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>FSC Post Clearance Reports completed monthly discuss pre-works assessment of documents prior to commencement of FSC Pre-clearance on-ground surveys being undertaken (Appendix B, items 108-117).</li> <li>The EWPs (Appendix B, items 83–87) identify potential impacts identified by drone surveys (pre and post clearing activities) and documented in the Pre Clearance Survey Report (Appendix B, item 89 and 90).</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
39.	Containment of planned clearing within the Project Area specified in Attachments A1-A22 of EPBC 2020/8867 and the approved clearing limits (EPBC Decision Notice) is confirmed.	Compliant	<ul style="list-style-type: none"> <li>• VDPs (Appendix B, items 13-17 and 161-165) include maps or drawings showing the allowable extent of works with respect to the Project disturbance footprint, which coincide with approved Disturbance Footprint.</li> <li>• The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>• EWPs (Appendix B, items 83-87) include maps and drawings showing the allowable extent of works with respect to the development footprint, as specified in the EPBC 2020/8867.</li> </ul>
40.	Clearing boundary is delineated clearly on mapping software and available to clearing works personnel.	Compliant	<ul style="list-style-type: none"> <li>• Photographs provided of Trimble GPS on board vegetation clearing plant (Appendix B, items 158 and 159) demonstrate Disturbance footprint data is loaded to GPS in a vegetation clearing machine.</li> <li>• VDPs (Appendix B, items 13-17 and 161-165) provide maps showing the work area extent, require spatial data for work area extent shown to be loaded into the machine control GPS for machines completing clearing activities and include a process for sign off by responsible personnel confirming all VDP requirements have been met.</li> <li>• Photographs of the Trimble GPS on board plant provides evidence of the spatial footprint data loaded to GPS in a vegetation clearing machine (Appendix B, item 88), as per a Permit to Disturb issued, complete with a Personnel Sign-on (plant operators using the data) acknowledgement page.</li> </ul>
<b>Pre-clearance surveys</b>			
41.	Prior to clearing works commencing in any location within the Disturbance Footprint, vegetation to be cleared will be inspected by a fauna spotter catcher no more than 4 weeks prior to commencing works.	Compliant	<ul style="list-style-type: none"> <li>• Species Management Programs were approved prior to clearing (Appendix B, items 6 and 7)</li> <li>• The EPC Contractor's CEMP (Appendix B, item 36) requires pre-clearance surveys in accordance with criteria.</li> <li>• VDPs (Appendix B, items 13-17 and 161-165) require pre-clearance surveys be undertaken and include a process for sign off by responsible personnel confirming all VDP requirements have been met.</li> <li>• The EPC Contractor's Monthly Report for August 25 (Appendix B, item 35) documents 31 Pre-clearance Fauna FSC surveys as completed for the 12-month period commencing September 2024.</li> <li>• LCWF Monthly Reports for the period September 24 to August 25 (Appendix B, items 24-35) document progressive conduct of pre-clearance fauna FSC surveys throughout the reporting period.</li> <li>• The Permit to Disturb – Works Procedure (Appendix B, items 79-82) demonstrates pre-clear inspections conducted by FSC as shown by personnel sign-on pages for both the Permit to Disturb and FSC Daily Pre-starts (Appendix B, items 92-95).</li> </ul>
42.	Pre-clearance surveys will identify, record, and mark (to identify features to be inspected immediately prior to clearing): <ul style="list-style-type: none"> <li>• Presence of Koalas or migratory species by undertaking canopy searches.</li> <li>• Trees with: hollows, fissures, cracks and nests (including stags).</li> <li>• Trees within mapped Greater Glider habitat that have a DBH &gt;30cm (including stags).</li> <li>• Greater glider hollows (openings &gt;8cm diameter).</li> <li>• Threatened flora.</li> <li>• Weeds and pests.</li> <li>• Ground habitat: areas with surface rocks, hollows on the ground etc.</li> <li>• Other fauna habitat features.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>• Pre-clearance survey reports attached to VDPs (Appendix B, items 13-17 and 161-165) provide pre-clearance survey reports as attachments which address the habitat features listed by the criteria and report on threatened species identified (by exception).</li> <li>• Photographs (Appendix B, items 167-171) provide evidence of the identification and marking of habitat trees.</li> <li>• The EPC Contractor's Pre-clearance ecological survey scope of work (Appendix B, item 160) specifies identification, recording and marking of habitat features and threatened species.</li> <li>• The proponent initiated environmental audit report dated 30/5/25, which focused on vegetation clearing activities and included a site inspection (Appendix B, item 4), documents compliance with the criteria, including the sighting of clearly marked habitat features.</li> <li>• The subcontractor evidence (Appendix B, items 83-87) identify pre-clearance features for inspection (maps) which are documented in the Pre Clearance Survey Report (Appendix B, items 89 and 90).</li> <li>• A summary of Environmental Activities and a Fauna Sightings Register are presented in the subcontractor Monthly Environmental Report to the client with all pre-clearance survey information (Appendix B, items 96-102). All construction activities have been able to avoid disturbance of all identified Greater Glider habitat, meaning that all mapped habitat remains undisturbed, (Appendix B, items 108-117).</li> <li>• MNES interactions have been recorded and documented, pre and post clearing as provided monthly in the FSC Post Clearance Reports from January to October 2025 (Appendix B, items 108-117).</li> <li>• Weed Treatment Reports presented monthly provide weed management data (Appendix B, items 103-107).</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
43.	<p>Individual breeding places for (relevant) MNES species will be identified, marked and mapped to direct FSC in managing impacts to breeding places during clearing.</p> <p>Evidence of MNES breeding / nesting during pre-clearance surveys will be recorded and monitored to ensure the nesting/ breeding activity has ceased before clearing and construction in that area continues.</p>	Compliant	<ul style="list-style-type: none"> <li>Pre-clearance survey reports attached to VDP's (Appendix B, items 13-17 and 161-165) map breeding places where identified. The records reviewed did not include any reference to MNES breeding / nesting activity.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>The EWPs (Appendix B, items 83-87) identify individual MNES breeding places (maps) which are pre-cleared surveyed prior to clearing. MNES interactions have been recorded and documented, pre and post clearing as provided monthly in the FSC Post Clearance Reports from January to October 2025 (Appendix B, items 108-117).</li> </ul>
44.	<p>Areas of predicted / mapped habitat for MNES species that have the potential to occur within the clearing footprint will be specifically targeted to search for micro-habitat features for salvage.</p>	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>No Greater Glider hollows were identified by the Project (refer to <b>Table 3.2</b>, item Appendix E), no migratory species were recorded at the site during the reporting period (Appendix B, items 13-17 and 161-165), microhabitat utilised by Squatter Pigeon (e.g. grass clumps etc) are not subject to translocation, Koala are not associated with micro-habitat features.</li> <li>The EWPs (Appendix B, items 83-87) and MNES interactions (Appendix B, items 108-117) document potential and occurrence of habitat features for salvage.</li> </ul>
45.	<p>Pre-clearance weed surveys will be conducted to quantify baseline abundance of target weed species<sup>3</sup> within the Disturbance Footprint.</p> <ul style="list-style-type: none"> <li>Baseline weed surveys will involve undertaking 300 m long transect counts of target weeds at a minimum of 10 separate locations within the Disturbance Footprint in following methodologies outlined in the NSW Government Monitoring Manual for Invasive and Native Flora (Watson et al 2021).</li> <li>The density of weeds will be measured at each transect by surveying 15 m either side of the centre line (creating a 300 x 30 m quadrat, with sample area of 9,000 m<sup>2</sup>).</li> <li>Weed density calculations will be generated for each species at each site and expressed as an overall density across the Disturbance Footprint.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents the pre-clearance baseline weed survey (Appendix B, item 118) as undertaken, but noting a deviation from the Lotus Creek MNES Management Plan specified criteria. An action for the EPC Contractor is to confirm survey rigour against the specified criteria.</li> <li>The EPC Contractors baseline survey report (Appendix B, item 166) was assessed by Attexo as exceeding the survey rigour required by the criteria and therefore is deemed as satisfying the intent of the requirement.</li> <li>The Pre-clearance Threatened Plant and Weed Survey Report (Appendix B, Item 90) documents all weed species identified across the Project footprint, with each occurrence GIS-referenced. This survey methodology provided comprehensive coverage of the disturbance area and therefore exceeded the prescribed criteria.</li> <li>Weed Treatment Reports presented monthly to the client, provide weed management record data (Appendix B, items 103 to 107).</li> </ul>
46.	<p>Pre-clearance pest surveys will be conducted to quantify baseline abundance of target pest fauna species (wild dogs, cats and foxes) within the Disturbance Footprint.</p> <ul style="list-style-type: none"> <li>Baseline pest fauna surveys will be undertaken to generate an activity index for Dogs, Foxes and Cats in accordance with the protocol recommended by Kays et al (2020).</li> <li>At least 10 camera traps will be deployed within Disturbance Footprint for a duration of 4 weeks prior to construction activities occurring in the vicinity.</li> <li>Camera traps will be unbaited to avoid interference with predator behaviour and false increases in activity indices.</li> <li>Camera traps will be set at 1 m above the ground on a post or tree, and if on a track, at an angle of 45 degrees to the track to increase detection rates.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The baseline pest survey report dated 4/4/2025 (Appendix B, 119) documents 10 camera traps set on posts and trees deployed for the month of October 2024. Baiting was not specified in the methodology described.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> </ul>

<sup>3</sup> Target weed species that may impact MNES species are defined as; any restricted matter under the *Biosecurity Act 2014*, listed as Weeds of National Significance (WoNS), or high priority weeds from the Isaac Regional Council (IRC) Biosecurity Plan (IRC, 2024).



Item	Requirement	Compliance designation	Discussion / evidence
47.	Pre-clearance surveys will involve canopy searches to identify Koalas in advance of clearing activities, as part of the best practice methods under the <i>Koala Sensitive Design Guideline</i> (DES 2020). Where a Koala has been identified, the tree will be flagged with tape or fluorescent spray-paint, along with any tree with an overlapping crown.	Compliant	<ul style="list-style-type: none"> <li>Pre-clearance survey reports attached to VDPs (Appendix B, items 13-17 and 161-165) report on Koala sightings and evidence of Koala presence (by exception).</li> <li>Photographs provided showing marked tree containing Koala (Appendix B, item 167) demonstrates checks for, and marking of, Koala trees.</li> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) documents 46 Koala sightings with the note '<i>Koala not disturbed, left in situ with exclusion zone around it</i>'.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>Thermal sensors, drones and passive spotlight methods were employed to undertake pre-clearance surveys to include canopy searches to identify Koalas.</li> <li>Koala data is presented in the monthly FSC Post Clearance Reports - Detection Evidence in Appendix E. Thermal Drone Survey Report, (Appendix B, items 108-117) and the Fauna Sightings register in the Lotus Creek Monthly Environmental Reports (Appendix B, items 96-102).</li> </ul>
48.	<p>All potential Greater Glider hollows in the Disturbance Footprint will be identified during pre-clearance surveys.</p> <ul style="list-style-type: none"> <li>Surveys will include canopy searches and identification of potential suitably sized tree hollows the identification of any trees within the disturbance footprint with a DBH &gt;30cm.</li> <li>Trees with a DBH &gt;30cm will be checked for hollows with openings larger than 8cm diameter and evidence of use by Greater Glider (as per the definition of Evidence Greater Glider use<sup>4</sup>).</li> <li>All trees with a diameter at breast height &gt;30 cm and containing hollows larger than 8cm in diameter will be recorded as containing potential Greater Glider hollows. The tree species will be recorded where trees are alive.</li> <li>Where any hollows are identified as being utilised by Greater Gliders, measurements of the height and aspect will be made.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The MNES Greater Glider spotlighting report (Appendix B, item 22) documents pre-clearance surveys for Greater Glider hollows within Greater Glider habitat in line with the criteria, no Greater Glider hollows were identified by the survey.</li> <li>Pre-clearance survey reports attached to VDPs (Appendix B, items 13-17 and 161-171) document searches for habitat including tree hollows, no Greater Glider hollows were recorded within the example reports provided.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>Greater Glider survey data mapped potential hollows and is presented in the monthly FSC Post Clearance Reports - Detection Evidence in Appendix E, showing potential hollows. Thermal Drone Survey Report, (Appendix B, items 108-117) and the Fauna Sightings register in the Lotus Creek Monthly Environmental Reports (Appendix B, items 96-102). No Greater Gliders were detected within the development footprint.</li> <li>Nine (9) trees identified during ecological and pre-clearance surveys as <i>potential</i> Greater Glider hollows showed no signs of Greater Glider use and therefore do not meet the definition of confirmed Greater Glider hollows. All nine (9) trees were located outside and mapped as confirmed or potential Greater Glider habitat areas, consistent with habitat mapping and avoidance requirements (Appendix B, item 89).</li> </ul>
49.	Squatter Pigeon nests will be identified during pre-clearance surveys. An exclusion zone will be established around any active Squatter Pigeon nests until young have fledged.	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's pre-clearance ecological survey scope of work (Appendix B, item 160) includes the identification of bird nests.</li> <li>Pre-clearance survey reports (Appendix B, items 173-177) did not record the presence of Squatter Pigeon nests.</li> <li>The LCWF Monthly Report for August 25 (Appendix B, item 35) documents 30 VDPs raised for the 12-month period commencing September 2024 and the VDP / Pre-clearance register (Appendix B, item 178) tracks pre-clearance surveys undertaken against VDPs issued demonstrating comprehensive coverage.</li> <li>Neither the post clearance fauna data, breeding place nor Squatter Pigeon sightings registers include records of Squatter Pigeon nests (Appendix B, items 71, 72 and 172 respectively).</li> <li>The proponent initiated environmental audit dated 30/5/25 (Appendix B, item 4) reported no Squatter Pigeon in clearing areas.</li> <li>Squatter Pigeon data is presented in interaction records of the monthly FSC Post Clearance Reports - Detection Evidence in Appendix E. Thermal Drone Survey Report, (Appendix B, items 108-117) and the Fauna Sightings register in the Lotus Creek Monthly Environmental Reports (Appendix B, items 96-102).</li> </ul>

<sup>4</sup> As per EPBC Act approval definition, evidence of Greater Glider use includes, but is not limited to, observing Greater Glider using the hollow, presence of scats within the hollow or around the tree, presence of Greater Glider fur within or around the Greater Glider hollow entrance.



Item	Requirement	Compliance designation	Discussion / evidence
50.	If other threatened species are recovered during the pre-clearance stage, the clearing methodology will be modified to reduce potential risks.	Compliant	<ul style="list-style-type: none"> <li>Pre-clearance survey reports (Appendix B, items 173-177), the register of fauna interactions (Appendix B, item 71) and post clearance survey reports (Appendix B, items 69-70) do not include records of threatened species not previously identified by the MNES MP.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) identifies item as not triggered as no other threatened species had been recovered.</li> <li>Other threatened species encountered data is presented in the monthly FSC Post Clearance Reports where works were stopped until fauna self-relocated - (Appendix B, items 108-117) and in the Lotus Creek Monthly Environmental Reports (Appendix B, items 96-102).</li> </ul>
<b>Clearing boundary delineation and containment of works</b>			
51.	All plant operators involved in clearing will have spatial data of the clearing boundary loaded to ensure works are undertaken within approved areas.	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) requires spatial data for the clearing boundary to be loaded to GPS in all clearing machines.</li> <li>Photographs provided of Trimble GPS on board vegetation clearing plant (Appendix B, items 158 and 159) demonstrates Disturbance footprint data is loaded to GPS in a vegetation clearing machine.</li> <li>Record of daily clearing toolbox talk (Appendix B, item 19) requires personnel to stop work if GPS becomes erratic or stops working and provides photographs of clearing boundary data loaded to machines, toolbox attendees sign off as having read and understood the daily clearing toolbox.</li> <li>VDPs (Appendix B, items 13-17 and 161-165) require spatial data for the work area extent to be loaded into the machine control GPS for machines completing clearing activities and include a process for sign off by responsible personnel confirming all VDP requirements have been met.</li> <li>Photograph of Trimble GPS on board plant provides evidence of spatial footprint data loaded to GPS in a vegetation clearing machine (Appendix B, item 88).</li> </ul>
52.	Additional physical demarcation of the Development Footprint after initial clearing will be undertaken in areas of sensitive vegetation using; stockpiled topsoil or vegetation, earthworks bunding and flagging as required.	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) requires additional physical demarcation as per criteria.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include a checklist item for site boundary marking, item was marked as compliant where checked (4 out of 5 examples provided).</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>Environmental Inspection Reports (Appendix B, items 121-125) include the risk aspects of Vegetation Management (e.g. boundary encroachment) for the development footprint. The item was marked as compliant where checked.</li> </ul>
53.	The extent of vegetation clearing (and no-go areas) will be clearly identified on construction plans.	Compliant	<ul style="list-style-type: none"> <li>Construction plans attached to VDPs (Appendix B, Items 13-17 and 161-165) identify disturbance boundaries.</li> <li>EWPs (Appendix B, items 83-87) show clearing boundaries identified on maps for the Project from stages one through to four.</li> </ul>
54.	Review disturbance areas monthly during construction to check clearing and construction areas have not exceeded approved areas for disturbance.	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractors EPBC clearing limits tracker (Appendix B, item 9) provides monthly records in separate worksheets and clearing limits are reported on within monthly progress reports (Appendix B, items 24-35) demonstrating monthly reviews.</li> <li>Disturbance areas during construction have been checked and clearing statistics are reported on within monthly progress reports (Appendix B, items 127-141).</li> </ul>
55.	In the event of clearing of native vegetation and/or disturbance to MNES habitats outside of the approved Disturbance Footprint: <ul style="list-style-type: none"> <li>Review processes for communicating and identifying approved areas for clearing works.</li> <li>Increase monitoring and control where required.</li> <li>Rehabilitation of any areas of disturbance outside the Disturbance Footprint.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the records cited by this report demonstrate clearing has been contained within the approved disturbance footprint.</li> <li>Unauthorised disturbance recorded in incident reports (Appendix B items 142 to 144) with review and remediation completed.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
<b>Fauna spotter catchers</b>			
56.	Will meet the following definition: A suitably qualified fauna spotter catcher (FSC) is a person authorised under the <i>Nature Conservation Act 1992</i> (Qld), and operating in accordance with requirements of a current Rehabilitation Permit, to detect, capture, care for, assess, and release wildlife disturbed by clearing who has at least 3 years' experience undertaking this work with the protected species.	Compliant	<ul style="list-style-type: none"> <li>Rehabilitation permit held by Kleinfelder sighted (Appendix B, item 67).</li> <li>Rehabilitation permit held by Fauna Spotters Australia Managing Director sighted (Appendix B, item 68).</li> <li>Written letter from rehabilitation permit holder authorising listed FSCs to operate under rehabilitation permit WA0054448 sighted (Appendix B, item 180). The persons listed include those identified by the post clearance fauna data register (Appendix B, item 71).</li> <li>Example CVs for two FSCs provided demonstrating 3 years' experience (Appendix B, item 243 and 244).</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>Rehabilitation permit and suitably qualified FSC engaged by the subcontractor is documented in Appendix B, item 120.</li> </ul>
57.	FSC responsibilities will be undertaken in accordance with the <i>Draft Queensland Code of Practice for the welfare of wild animals affected by land-clearing and other habitat impacts and wildlife spotter/catchers</i> (Hanger & Nottidge, 2009) (the code of practice).	Compliant	<ul style="list-style-type: none"> <li>FSC responsibilities were fulfilled by FSCs operating under rehabilitation permits (as detailed previously for Commitment 56), which necessitates compliance with the stated criteria.</li> <li>The FSC Clearing Services were completed in accordance with the Queensland <i>Nature Conservation Act 1992</i> (NC Act), the Queensland Nature Conservation (Koala) Conservation Plan 2020, and the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). The FSC Clearing Services was carried out under Impact Environmental Rehabilitation Permit WA0049843, (Appendix B, items 108-117).</li> </ul>
<b>Vegetation clearing</b>			
58.	All vegetation and habitat clearing activities will be supervised by a FSC, with the authority to cease habitat clearance for an appropriate timeframe where MNES may be impacted.	Compliant	<ul style="list-style-type: none"> <li>Example VDPs (Appendix B, items 13-17 and 161-165) include permissibility assessment and controls checklist which required a qualified ecologist (FSC) to be present during clearing and grubbing works in all cases, an acknowledgement of controls signed by vegetation clearing personnel is attached to VDPs. VDP close out involves signed declaration by EPC Contractor representatives that works have been completed in accordance with VDP.</li> <li>Register of fauna interactions (Appendix B, item 71) includes 464 entries logged between 24/10/24 and 10/8/25. Data logged includes details of FSC present, species occurrence and conservation status, GPS locations and capture and release dates. The coordinates listed in the FSC register were compared with the clearing spatial data (Appendix B, item 18), confirming that FSC supervision covered the entire clearing extent.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria, referring to evidence including VDPs, interviews with Project personnel, FSC field forms and post clearance reports and training records.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108-117), the June report, describes "<i>Koalas halted all clearing works due to being within the clearing easement.</i>" The reports also provides the FSC procedure and protocol for handling clearing habitat.</li> </ul>
59.	Check delineation of boundaries and sign off prior to clearing commencing.	Compliant	<ul style="list-style-type: none"> <li>Example VDPs (Appendix B, items 13-17 and 161-165) include a prestart checklist requiring sign off that boundary pegging and flagging has been inspected and is clearly visible.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>Example Permits to Disturb (Appendix B, items 79 to 82) have a Personnel Sign On page acknowledging the scope of works, clearing works procedure and controls in place, prior to clearing commencing.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
60.	The FSC will search for terrestrial reptiles and mammals in areas with surface rocks and timber and relocate fauna immediately prior to clearing.	Compliant	<ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) includes numerous entries for terrestrial reptiles and mammals indicating searches were undertaken.</li> <li>The example post clearance (fauna) reports provided (Appendix B, items 69 and 70) list habitat feature types cleared, including surface habitats such as debris, ground timber, leaf litter, rocky outcrops and terrestrial rock piles.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species moved on.</li> </ul>
61.	Order stop works if: <ul style="list-style-type: none"> <li>threatened fauna is found within clearing area.</li> <li>breeding activity or nests are observed within the clearing area.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The post clearance fauna data register (Appendix B, item 71) documents 46 Koala sightings with the note 'Koala not disturbed, left in situ with exclusion zone around it' (one note missing, deemed as data entry error). No other records of threatened fauna were logged.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents an instance of a 'stop work' initiated in response to a Koala sighting to enable flagging and allow the Koala to move on of its own accord.</li> <li>Neither the animal breeding place register (Appendix B, item 72) or the register of fauna interactions (Appendix B, item 71) record instances of breeding activity or active nests within the clearing area.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on.</li> </ul>
62.	If a migratory bird species is identified as foraging or roosting in the Development Footprint, the FSC will ensure that the species moves on prior to clearing works in the area.	Compliant	<ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) does not include any records of migratory bird species.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents the criteria as 'not triggered'.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species moved on.</li> </ul>
63.	Squatter pigeon: the FSC will check area for nests and birds (by flushing) prior to clearing. Clearing will not commence until individuals have left the area to be cleared.	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) found that FSC checks were being undertaken however that Squatter Pigeon had not featured within clearing areas.</li> <li>Neither the post-clearance fauna data, breeding place or Squatter Pigeon sightings registers (Appendix B, items 71, 72 and 172 respectively) include records of Squatter Pigeon within vegetation clearing areas.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on.</li> </ul>
64.	Breeding places: <ul style="list-style-type: none"> <li>Active breeding / nesting identified during pre-clearance surveys has ceased before clearing and construction in that area continues.</li> <li>FSC to check for roosting birds prior to clearing - no clearing if migratory species are roosting.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Pre-clearance survey reports (Appendix B, items 173-177) did not record MNES breeding places or roosting migratory birds.</li> <li>Neither post-clearance fauna data register, or the breeding place register (Appendix B, items 71, 72 respectively) include records of active breeding / nesting MNES species or roosting migratory birds.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on.</li> </ul>





Item	Requirement	Compliance designation	Discussion / evidence
65.	Trees will be progressively cleared to enable fauna residing in, or near the clearing site, enough time to vacate the clearing area and move into adjacent vegetation without human intervention as much as possible.	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4), which focussed on vegetation clearing activities and included a site inspection documents sequential and staged clearing as being undertaken to enable fauna to vacate the clearing area.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on.</li> </ul>
66.	FSC to check each tree for koala prior to clearing.	Compliant	<ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) includes 46 Koala sightings, demonstrating searches are undertaken.</li> <li>Example pre-clearance survey reports (Attachment B, items 173-177), as well as those attached to the VDPs provided (Appendix B, items 13-17 and 161-165) document evidence of Koala presence and specifically require a Koala monitoring survey to be conducted immediately prior to clearing.</li> <li>The proponent initiated environmental audit report dated 30/5/25, which focused on vegetation clearing activities and included a site inspection (Appendix B, item 4), documents compliance with Koala requirements.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108-117), the June report, describes “<i>Koalas halted all clearing works due to being within the clearing easement.</i>” The reports also provide the FSC procedure and protocol for handling clearing habitat.</li> </ul>
67.	<p>In areas of potential Koala habitat, the clearing will be undertaken in a manner consistent with Part 3 s(10)3a-c of the <i>Nature Conservation (Koala) Conservation Plan 2017</i> that defines the process for sequential clearing. The sequential clearing condition approach will involve following:</p> <ul style="list-style-type: none"> <li>Stepping stones will include small patches of Koala habitat area (e.g. areas less than 2 ha), patches of other vegetation that includes scattered Koala habitat trees or a single Koala habitat tree.</li> <li>Stepping stones will be as close as possible and will be a minimum<sup>5</sup> of 100m from large Koala habitat areas or other stepping stones as this is the average distance that a female Koala will move in a day.</li> <li>Clearing of the Koala habitat trees is carried out in a way that ensures Koalas on the area being cleared (the clearing site) have enough time to move out of the clearing site without human intervention.</li> <li>Clearing of the Koala habitat trees is carried out in a way that ensures, while the clearing is carried out, appropriate habitat links are maintained within the clearing site and between the site and its adjacent area, to allow Koalas living on the site to move out of the site.</li> <li>No Koala habitat tree in which a Koala is present, and no Koala habitat tree with a crown overlapping a tree in which a Koala is present, is cleared.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) which focused on vegetation clearing activities, documents compliance with the <i>Nature Conservation (Koala) Conservation Plan 2017</i> and all stated criteria.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include a checklist item for disturbance of protected species, item was marked as no impact in all examples provided.</li> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) documents 46 Koala sightings with the note ‘<i>Koala not disturbed, left in situ with exclusion zone around it</i>’ (one note missing, deemed as data entry error).</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on. This includes the protocols of the methods employed when a Koala was encountered throughout the Project area.</li> </ul>

<sup>5</sup> As per MNES MP - should read ‘maximum’



Item	Requirement	Compliance designation	Discussion / evidence
68.	None of the flagged trees (for koala) nor trees at risk of falling onto the tree with identified Koala will be cleared until the Koala has moved on of its own accord.	Compliant	<ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) documents 46 Koala sightings with the note '<i>Koala not disturbed, left in situ with exclusion zone around it</i>'.</li> <li>Example pre-clearance survey reports (Attachment B, items 173-177), as well as those attached to the VDPs provided (Appendix B, items 13-17 and 161-165) document evidence of Koala and where present, specifically require that trees observed containing Koalas are barricaded, exclusion zones established and no clearing within an exclusion zone until the Koala has successfully relocated.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include a checklist item for disturbance of protected species, with the item marked as 'no impact' in all examples provided.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with the criteria.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108-117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on. This includes the protocols of the methods employed when a Koala was encountered throughout the Project area (in accordance with the Queensland NC Act, the Queensland Nature Conservation (Koala) Conservation Plan 2020).</li> </ul>
69.	<p>Greater Gliders:</p> <ul style="list-style-type: none"> <li>Spotter catcher to check all HBTs in Greater Glider habitat prior to felling</li> <li>Sequential clearing will occur in areas (where HBTs might otherwise become isolated) to allow dispersal corridors to link vegetation within clearing areas to adjacent areas of retained habitat.</li> <li>Such corridors could consist of a single row of trees no more than 30 -40m apart that will act as 'stepping stones' to allow Greater Gliders to glide from tree to tree.</li> <li>Trees with potential Greater Glider Hollows be tapped before felling and left overnight to allow for fauna to self-relocate.</li> <li>If Greater Gliders are potentially still present, trees will be either lowered with machinery fitted with a vertical tree-grab attachment using its boom to slow the trees fall, or the tree will be dismantled in sections.</li> <li>Within areas of Greater Glider habitat, every 500 metres there will be a section of road where the maximum width that is to be cleared is 15 metres, for a minimum of 50 metres length along the linear clearing. Areas outside these narrowed sections will remain at the minimum width necessary for construction.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The example post-clearance (fauna) reports provided (Appendix B, items 69 and 70) demonstrate habitat identified (including hollows where present) was checked for fauna prior to clearing.</li> <li>No Greater Glider hollows, as defined by EPBC 2020/8867 Part C, were identified by Greater Glider surveys undertaken within potential Greater Glider habitat. <ul style="list-style-type: none"> <li>The MNES Great Glider Spotlighting Survey Report (Appendix B, item 22) documents surveys undertaken to identify Greater Glider Hollows and associated findings.</li> <li>A comparison of spatial data showing the clearing extent up to 19/8/25 (Appendix B, item 18) against maps provided within the Great Glider Spotlighting Survey Report (Appendix B, item 22) shows no clearing has been undertaken within potential Greater Glider habitat outside of that which is covered by the above survey report.</li> </ul> </li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents items as not triggered, citing the MNES Great Glider Spotlighting Survey Report (Appendix B, item 22), FSC post clearing reports and interviews with Project personnel as evidence for this finding.</li> <li>All construction activities have not disturbed identified Greater Glider habitat, meaning that all mapped habitat remains undisturbed. No salvage or relocation of Greater Glider hollows has occurred during this reporting period (Appendix B, items 22, 89 and 108-117). <ul style="list-style-type: none"> <li>For consistency with approved habitat mapping and the projects avoidance requirements, nine (9) trees were identified during ecological and pre-clearance surveys for powerline activities, as hosting potential Greater Glider hollows however showed no signs of Greater Glider use and therefore do not meet the definition of confirmed Greater Glider hollows. All nine (9) trees were located outside and mapped as confirmed or potential Greater Glider habitat areas, consistent with habitat mapping and avoidance requirements (Appendix B, item 89).</li> </ul> </li> <li>No Greater Glider habitat trees were taken, cleared, or disturbed resulting from overhead transmission line construction works. Therefore, the installation or availability of nestboxes has not been required to date supported by data in the FSC Pre Clearance Survey Report (Appendix B, items 89).</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
70.	<p>Hollow bearing trees:</p> <ul style="list-style-type: none"> <li>A sensitive clearing technique will be implemented to fell HBTs to minimise impacts to fauna.</li> <li>HBTs will be felled in a manner which reduces potential for fauna mortality.</li> <li>Trees will be tapped before felling and left overnight to allow for fauna to self-relocate.</li> <li>The fauna spotter catcher will determine which trees will be felled using the sensitive clearing technique.</li> <li>HBTs will not be pushed and allowed to fall under their own weight.</li> <li>After felling, HBTs will be inspected by a fauna spotter to determine if any animals are present.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents item as not triggered, citing the MNES Great Glider Spotlighting Survey Report (Appendix B, item 22), FSC post clearing reports and interviews with Project personnel as evidence for this finding.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include a checklist item for sensitive tree felling in accordance with MNES MP, the item was marked as compliant (3) or NA (2) in all the examples provided.</li> <li>Nine (9) trees identified during ecological and pre-clearance surveys as <i>potential</i> Greater Glider hollows located outside the development footprint and mapped consistent with habitat mapping and avoidance requirements (Appendix B, item 89).</li> <li>HBT management protocols were implemented in accordance with approved procedures. Clearing activities avoided HBTs where practicable, with fauna spotter-catchers overseeing works and stopping activities until threatened fauna vacated the area. The Monthly FSC Post-Clearance Report (Appendix B, items 108–117) verifies compliance with EPBC Act requirements.</li> </ul>
71.	If other threatened species are recovered during clearing, the clearing methodology will be modified to reduce potential risks.	NA	<p>Requirement not triggered:</p> <ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) does not include records for threatened species other than Koala.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include a checklist item for disturbance of protected species, item was marked as no impact in all examples provided.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents item as not triggered.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on. This includes the protocols of the methods employed when threatened fauna was encountered throughout the Project area.</li> </ul>
72.	<p>Records of clearing activities and FSC attendance are to be maintained, in the event FSC is not present during clearing, within 1 week of incident:</p> <ul style="list-style-type: none"> <li>Review permit to disturb process and communication.</li> <li>Review approach to preclearance surveys and FSC use during clearing.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Records sufficient to demonstrate FSC attendance during clearing activities have been sighted and retained as described by this report.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on. This includes the protocols of the methods employed when threatened fauna was encountered throughout the Project area.</li> </ul>
<b>Fauna handling / treatment</b>			
73.	<p>Fauna relocation:</p> <ul style="list-style-type: none"> <li>FSCs will be on site to remove or relocate fauna not detected during pre-clearance surveys.</li> <li>FSCs will capture and safely release any uninjured fauna present.</li> <li>If a nocturnal threatened species, other than a Greater Glider, is recovered, it will be promptly transported by the FSC to a suitable location. The animal will be released near to where it was found just after dusk.</li> <li>Handling of fauna will be undertaken in accordance with best practice as detailed in the <i>Australian Wildlife Conservancy trapping handling and sampling guidelines</i> (AWC 2013).</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) requires all fauna handling by a qualified FSC.</li> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) documents removal / relocation / capture / safe release of uninjured fauna by FSCs.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents compliance with all specified criteria.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on. This includes the protocols of the methods employed when threatened fauna was encountered throughout the Project area.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
74.	<ul style="list-style-type: none"> <li>Greater Gliders which need to be relocated will be released into the nearest salvaged hollow or nest box.</li> <li>Greater Gliders will be given the opportunity to disperse from the area once clearing has commenced.</li> </ul>	NA	<ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) does not include any Greater Glider interactions.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents items as not triggered – no Greater Gliders encountered.</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records of searches, catch and release, or where works were stopped until threatened species were moved on. This includes the protocols of the methods employed when threatened fauna was encountered throughout the Project area.</li> </ul>
75.	<p>Injured fauna:</p> <ul style="list-style-type: none"> <li>Any injuries or deaths of threatened fauna species will be reported immediately to the Site Environmental Coordinator.</li> <li>Injured or orphaned wildlife will be transported to the nearest wildlife carer immediately.</li> <li>If a threatened species, FSC to assess whether clearing approach could be improved.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) does not include any records of death or injury of threatened fauna species.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) found no record of injury to threatened fauna species.</li> <li>Correspondence and logged events of example FSC reports (Appendix B, items 75, 76 and 77) document injured and orphaned wildlife (not including threatened species) encountered within the Project area as being transferred to appropriate wildlife carers.</li> <li>Four (4) notifications of MNES interactions were recorded with the fauna taken to a specialised and licenced wildlife carer (Appendix B, items 145 -148). Note that there were no impacts from the Project on the MNES species. The MNES were identified as requiring medical treatment during pre-clearance surveys.</li> </ul>
76.	Any death of a threatened fauna species listed under the EPBC Act will be reported to DCCEE in accordance with incident reporting requirements set out in CoA 59.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered: <ul style="list-style-type: none"> <li>The register of fauna interactions during vegetation clearing provided (Appendix B, item 71) does not include any records of death or injury of threatened fauna species.</li> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents item as not triggered – no record of death of a threatened fauna species as a result of the Project.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include a checklist item for disturbance of protected species, item was marked as no impact in all examples provided.</li> </ul> </li> </ul>
<b>Hollow habitat salvage and reinstatement</b>			
77.	<p>All hollow relocations and nest box installations will follow the requirements of Attachment E of the Conditions of Approval for Lotus Creek Wind Farm (EPBC 2020/8867).</p> <p>All felled suitable (Greater Glider) hollows will undergo a salvage attempt and be removed by chainsaw (operated by a trained arborist).</p>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
78.	<p>Nestboxes:</p> <ul style="list-style-type: none"> <li>Artificial nest boxes will be installed as a secondary measure where hollows cannot be successfully salvaged or are unsuitable for relocation (not to exceed 5% of hollows replaced).</li> <li>Install nest boxes within 1 week of need being identified.</li> <li>Artificial nest boxes will be available on site to supplement unsalvageable hollows.</li> <li>Nestbox design selection and installation will be based on best practice information from the RTAs Biodiversity Guidelines: Protecting and managing biodiversity on RTA projects (RTA 2011).</li> <li>Nest box design will be in accordance with Franks and Franks (2003), i.e. hollow entrance 90 mm diameter, rear entrance (to avoid competition from Common Myna (<i>Acridotheres tristis</i>)).</li> <li>Supplementary nest boxes for any potential Greater Glider hollows lost during salvage at a rate of 4:1</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
79.	<p>Hollow / nest box Recipient sites:</p> <ul style="list-style-type: none"> <li>Will be informed by data collected during pre-clearance surveys.</li> <li>A suitably qualified ecologist will identify nearby suitable habitat for the installation of relocated or artificial Greater Glider hollows.</li> <li>Greater Glider Hollows marked to be cleared will be re-located to Greater Glider habitat in areas of retained vegetation or revegetated habitat within the Project site, or the Greater Glider offset site to provide additional habitat.</li> <li>Tree guards will be installed on any tree with salvaged hollows or nestboxes Greater Glider nest boxes installed to protect from future potential impacts (e.g. agricultural activities including ring-barking etc).</li> <li>Host tree selection will consider the following conditions of the salvaged hollow or nest box to replicate: <ul style="list-style-type: none"> <li>Height (m) from the ground where the salvaged hollow was removed.</li> <li>Depth of the salvaged hollow (for insulation material depth, which will be at least as deep as the thickness of the sides of the hollow).</li> <li>Orientation of the hollow.</li> <li>Tree species.</li> </ul> </li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
80.	<p>Installation:</p> <ul style="list-style-type: none"> <li>Hollows and nest box installation will be undertaken in accordance with methods outlined in best practice information on Greater Glider hollow and nest box installation (RTA 2011, TMR 2010).</li> <li>The salvaged hollow or artificial nest box will be installed in a host tree with similar conditions as where the hollow was found either by a cherry picker (or similar) or trained arborist operating in a team of two.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
81.	<p>Monitoring:</p> <ul style="list-style-type: none"> <li>Monitoring of Glider relocated hollows will be conducted in accordance with the Conditions of Approval Attachment D (d):</li> <li>Monitoring of relocated and salvaged hollows will be assessed for evidence of Greater Glider use<sup>4</sup>: <ul style="list-style-type: none"> <li>using active survey searches of salvaged hollows and nest boxes, as well as other hollow bearing trees in the immediate surrounds</li> <li>on a quarterly basis for the first 24 months or until performance criteria have been achieved, then annually for the life of the approval.</li> <li>quarterly surveys include scat and scratch searches at base of trees containing salvaged hollows and nest boxes and spotlight searches of salvaged hollows and nest boxes.</li> </ul> </li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
82.	<p>Utilisation:</p> <ul style="list-style-type: none"> <li>Relocated Greater Glider hollows, or nest boxes, for Greater Gliders show utilisation of at least 50%.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
83.	<p>Record keeping:</p> <ul style="list-style-type: none"> <li>Any hollows to be salvaged will have observations and measurements recorded including depth and height.</li> <li>Record details of salvage and relocation of each potential Greater Glider hollow.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
84.	<p>Reporting:</p> <ol style="list-style-type: none"> <li>At the end of each stage of the Project, Greater Glider hollow salvage rates will be reported.</li> <li>The results of monitoring of salvaged hollows for evidence of Greater Glider use (quarterly basis for the first 24 months or until performance criteria have been achieved, then annually for the life of the approval – see item X) will be included in annual reporting.</li> </ol>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
85.	<p>In the event that &gt;5% of potential Greater Glider hollows are lost during salvage, a review and update to this Plan will be undertaken in accordance with the conditions of approval to include any additional measures which may be required to ensure the effectiveness of alternative measures, including demonstration that proposed measures are likely to successful based scientific research.</p>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
86.	<p>In the event that Greater Glider utilisation of salvaged hollows and nest boxes is &lt;50% or damage of the boxes occurs, including pest animal occupancy in salvaged hollows.</p> <ul style="list-style-type: none"> <li>Possible causes of disuse will be investigated and corrective actions developed by a suitably qualified ecologist within two weeks of the trigger being detected.</li> <li>Additional time for monitoring may also be required as other programs have shown it can take many months for observations to be found.</li> <li>Undertake Greater Glider survey to determine presence in the area.</li> <li>Corrective actions will be implemented within 3 months following the corrective actions being agreed.</li> <li>If any salvaged hollows are damaged, they will be repaired within one month after the damage has been identified.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – refer to <b>Table 3.2</b> Attachment E items.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
Glider poles			
87.	Requirements for Glider poles within high value MNES habitat (for Greater Glider) - various	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – Refer to <b>Table 3.2</b> Attachment E items.</li> </ul>
Biosecurity			
88.	Weed control: <ul style="list-style-type: none"> <li>Target weeds<sup>6</sup> within the Disturbance Footprint will be treated every six months during construction, and then on an annual basis for the duration of the approval.</li> <li>Weeds within the Disturbance Footprint will be treated:               <ul style="list-style-type: none"> <li>by a suitably qualified contractor.</li> <li>using recognised and approved control strategies developed in consultation with IRC and landholders.</li> </ul> </li> </ul>	Compliant	Note: Post construction weed control NA – relates to a future milestone. <ul style="list-style-type: none"> <li>Email correspondence (Appendix B, item 45) documents measures taken to treat giant rats tail grass identified during August 2025.</li> <li>ChemCERT AHCCHM307 (prepare and apply chemicals to control pest, weeds and diseases) Certificates (Appendix B, items 38 and 39) provided for two (2) EPC Contractor personnel.</li> <li>Completed weekly inspection records (Appendix B, items 46-50) demonstrate that regular weed monitoring was undertaken during the reporting period with no restricted matter identified within by the sample provided.</li> <li>Weed Treatment Reports presented monthly provide weed management data performed by suitably qualified persons, (Appendix B, items 103 to 107 and item 195).</li> <li>Weed management undertaken by suitably qualified persons during December 2024, January - April 2025 and September – October 2025 are presented in a weed treatment tracker table, which includes location, weed species and herbicide application (Appendix B, items 103-107).</li> </ul>
89.	Vehicle hygiene: <ul style="list-style-type: none"> <li>Weed hygiene protocols will be adopted for the duration of the approval.</li> <li>All plant and machinery brought to the Project Site will be certified as weed free.</li> <li>All vehicles and machinery will be washed down prior to entry of the Project area.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) requires pre-mobilisation weed and seed declaration for all vehicles, plant and equipment prior to site access whereby washdowns are carried out offsite with an onboarding inspection conducted prior to site entry by a suitably qualified person (SQP). Vehicles / plant / equipment failing the onboarding inspection are refused entry to site.</li> <li>Example completed plant and equipment onsite inspection records (Appendix B, items 40-44 and 185-191) include photographs and completed checklists developed in accordance with <i>Vehicle and Machinery Checklists – Clean-down procedures</i> (Biosecurity Queensland, 2014).</li> <li>All vehicles and machinery mobilising onto the Project were inspected by a suitably qualified person with AHC BIO203 – Inspect and clean machinery tools and equipment to preserve biosecurity as reported in the monthly Lotus Creek Monthly Environmental Report (Appendix B, items 96-102).</li> </ul>
90.	Specified washdown process: <ul style="list-style-type: none"> <li>Vehicle wash-downs will be undertaken in accordance with clean-down procedures, guidelines and checklist detailed by Biosecurity Queensland, in particular the <i>Vehicle and Machinery Checklists – Clean-down procedures</i> (Biosecurity Queensland, 2014).</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Example completed plant and equipment onsite inspection records (Appendix B, items 40-44 and 185-191) include photographs and completed checklists developed in accordance with <i>Vehicle and Machinery Checklists – Clean-down procedures</i> (Biosecurity Queensland, 2014).</li> <li>All vehicles and machinery mobilising onto the Project were inspected by a suitably qualified person with AHC BIO203 – Inspect and clean machinery tools and equipment to preserve biosecurity as reported in the monthly Lotus Creek Monthly Environmental Report (Appendix B, items 96-102).</li> </ul>
91.	Imported materials such as sand, gravel and sediment control materials will be sourced from sites which have been declared free of noxious weeds or Phytophthora infection by a suitably qualified person (included in glossary).	Compliant	<ul style="list-style-type: none"> <li>Test certificate provided for pavement material (Appendix B, item 192) demonstrates imported materials received from May Downs Quarry operated by CNN Resources Pty Ltd, licensed under Environmental Authority (EA): P-EA-100135501 and holding Isaac Regional Council Approval MCU21/0012 (confirmed accessing publicly available data)               <ul style="list-style-type: none"> <li>Material sourced from an operational quarry licensed under the <i>Queensland Environmental Protection Act 1994</i> and holding local government approval, is deemed as having met the intent of the criteria which is that imported material received is weed and disease free.</li> </ul> </li> <li>Imported rock for rock armouring was used for scour protection (Appendix B, items 135-141) materials received from May Downs Quarry operated by CNN Resources Pty Ltd, licensed under Environmental Authority (EA): P-EA-100135501 and holding Isaac Regional Council Approval MCU21/0012 (confirmed accessing publicly available data), Appendix B, item 225.</li> </ul>

<sup>6</sup> *Lantana camara*, *Opuntia stricta*, *O. tomentosa* and *O. streptacantha*.



Item	Requirement	Compliance designation	Discussion / evidence
92.	<p>Monitoring:</p> <ul style="list-style-type: none"> <li>Undertake 6 monthly inspections of Disturbance Footprint during construction to identify location of target weeds.</li> <li>Report weed and pest species to environmental supervisor.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Completed inspection records (Appendix B, item 46-50) provide for weed monitoring of the Disturbance Footprint at a nominated weekly inspection frequency.</li> <li>The EPC Contractor's CEMP (Appendix B, item 36) requires reporting of pest sightings.</li> <li>Environmental inspections were conducted approximately every 4–6 weeks, with frequency adjusted based on the progress of works and with various contractors. Environmental Inspection Reports (Appendix B, items 121-125) includes checklist-based assessment of compliance with environmental controls.</li> </ul>
93.	At the end of each Project stage monitoring will demonstrate weed abundance has been maintained or decreased across Development Footprint vs the pre-clearance survey baseline.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – first Project stage (construction) remains underway.</li> </ul>
94.	<p>Pest fauna control:</p> <ul style="list-style-type: none"> <li>A pest fauna management program is to be developed in consultation with the landholder.</li> <li>Pest control methods will be developed and implemented using best practice approaches, guided by IRC and Department of Agriculture and Fisheries (DAFF)<sup>7</sup>.</li> <li>Pest fauna control within the Disturbance Footprint will be undertaken by a licenced contractor every six months during construction, and then on an annual basis for the duration of the approval.</li> <li>The intensity of pest control will be varied to ensure that pest numbers do not increase as a result of the Project, and in particular the increased availability of carcasses that may occur from turbine strike.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The baseline pest survey report (Appendix B, item 119) makes recommendations and nominates various methods for the management of pest fauna.</li> <li>Correspondence evidence demonstrates pest fauna control was undertaken by the Landowner (Appendix B, item 245).</li> </ul>
95.	In the event that weed and pest management is not undertaken in accordance with commitments, undertake additional / new weed and pest management activities within 3 months of identification.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – failure to undertake weed and pest management in accordance with commitments was not identified during the reporting period.</li> </ul>
96.	<p>In the event of any increase in weed or pest abundance compared with baseline numbers established during pre-clearance surveys or new significant weed introduced to Disturbance Footprint:</p> <ul style="list-style-type: none"> <li>Undertake review of MNES MP Plan current methods and improvements to be made.</li> <li>Depending on the cause, corrective actions to be applied include but are not limited to: <ul style="list-style-type: none"> <li>Weed protocol retraining for all staff (by suitably qualified person), increased weed hygiene;</li> <li>Increase frequency or change methods for weed and pest management.</li> </ul> </li> <li>From the investigation, corrective actions will be developed by a suitably qualified person within 2 weeks of the trigger being detected.</li> <li>Identified corrective actions will be implemented within one month of corrective actions being agreed.</li> <li>Review of attractants (i.e. unsecured bins with food waste) by suitably qualified person.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the evidence reviewed for this audit (Appendix B, items 46 - 50), did not identify any increase in weed or pest fauna abundance.</li> </ul>

<sup>7</sup> Now the Department of Primary Industries





Item	Requirement	Compliance designation	Discussion / evidence
<b>Bushfire management</b>			
97.	Fire prevention: <ul style="list-style-type: none"> <li>A hot works permit process will be implemented for any activities that may create sparks such as welding.</li> <li>Bushfire management measures will be implemented, including specific measures for vehicle use, smoking, and use of flammable materials.</li> <li>Management of fuel loads around buildings</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) requires a permit for any hot works onsite and specifies measures to minimise bushfire risk associated with vehicle use and limits smoking to designated areas with fireproof containers for cigarette butts. Appendix E (of the CEMP) provides a fire management inspection checklist requiring storage of flammable substances away from ignition sources.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include checklist items for all listed criteria, all items were confirmed as compliant where relevant and checked.</li> <li>All vehicle, mobile plant and equipment are required to have fire extinguishers fitted (checked during onsite inspection, Appendix B, items 40-44).</li> <li>Bushfire management records for fire drills demonstrate evacuation and preparedness, clear access routes and communication with Queensland Fire and Rescue Services (QRFS) (Appendix B, item 181-184). This is aligned with the Emergency Response Plan (Appendix B, item 228) which meets the intent of this condition.</li> </ul>
98.	Fire Emergency Response: <ul style="list-style-type: none"> <li>An Emergency Response Plan (ERP):               <ul style="list-style-type: none"> <li>will be prepared and implemented for the construction phase of the Project</li> <li>will be developed in consultation with local emergency management and disaster management groups, landholders and the Queensland Rural Fire Service.</li> </ul> </li> <li>Fire-fighting equipment and water to be maintained on hand.</li> <li>Emergency service access clear.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The contractor's Emergency Management Plan (Appendix B, item 223 and 228) specifies bushfire response protocols, firefighting equipment, requirements for maintaining access for emergency vehicles, requirements for contacting Emergency Services and emergency contact details and refers to landholders as external stakeholders.</li> <li>Vehicle inspection checklists (Appendix B, items 40-44 and 185-191) include checks for fire extinguishers.</li> <li>Evidence provided include confirmation of a site visit from QRFS and water point location signs (Appendix B, item 246 and 247).</li> <li>Bushfire management records for fire drills demonstrate evacuation and preparedness, clear access routes and communication with QRFS (Appendix B, item 181-184). This is aligned with the Emergency Response Plan (Appendix B, item 228) which meets the intent of this condition.</li> </ul>
99.	Work with the Queensland Rural Fire Service (QRFS) to allow access and use of access tracks for bushfire response.	Compliant	<ul style="list-style-type: none"> <li>Evidence provided include confirmation of a site visit from QRFS and water point location signs (Appendix B, item 246 and 247).</li> </ul>
100	A Bushfire Management Plan (BMP) will be developed for the Project that will contain all bushfire management and mitigation measures within the footprint including: <ul style="list-style-type: none"> <li>An Asset Protection Zone around infrastructure.</li> <li>Mowing and slashing to reduce fuel around buildings.</li> <li>Access tracks to be kept as fire breaks and defensible spaces.</li> <li>Smoke detectors and fire-fighting equipment such as fire extinguishers to be kept in permanent buildings and temporary site offices.</li> <li>Project vehicles to contain fire extinguishers and CB radios.</li> <li>A water supply tank suitable for firefighting to be maintained near buildings.</li> <li>Access tracks and layout designed and to be maintained to allow sufficient emergency service access for the purposes of firefighting.</li> <li>Requirements to:               <ul style="list-style-type: none"> <li>Reinstate existing fire breaks damaged during construction.</li> <li>Ensure new buildings meet AS 3959-2018, where applicable.</li> <li>Provide suitable ingress and egress to the Project site and escape routes.</li> </ul> </li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The whole of Project Bushfire Risk Management Plan (Appendix B, item 224) addresses all the stated criteria.</li> <li>Bushfire management records for fire drills demonstrate evacuation and preparedness, clear access routes and communication with QRFS (Appendix B, item 181-184). This is aligned with the Emergency Response Plan (Appendix B, item 228).</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
101.	Reporting: <ul style="list-style-type: none"> <li>Report all fire risks to safety officer.</li> <li>Report all fires to 000 and local fire brigade.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Requirement for the reporting of fires not triggered – analysis of evidence undertaken for this audit did not identify any occurrences of fire associated with the Project.</li> <li>The subcontractor's Emergency Management Plan (Appendix B, item 223 and 228) requirements for contacting Emergency Services and emergency contact details.</li> <li>Bushfire management records for fire drills demonstrate evacuation and preparedness, clear access routes and communication with QRFS (Appendix B, item 181-184). This is aligned with the Emergency Response Plan (Appendix B, item 228).</li> </ul>
<b>Rehabilitation of temporary clearance areas</b>			
102.	All temporary clearance areas (areas not required for ongoing operation of the Project) will be rehabilitated.	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) specifies progressive rehabilitation.</li> <li>EPC Contractor weekly and monthly progress reports (Appendix B, items 60-66 and items 24-35 respectively) provide cumulative status updates for progressive rehabilitation completed to date (area finished and percentage complete).</li> <li>Photographs provided in weekly (Appendix B, items 60-66) and monthly (Appendix B, items 24-35) indicates progressive rehabilitation (e.g. topsoil spreading, hydro mulch application and groundcover re-establishment).</li> <li>Seeding and active rehabilitation had not commenced as of the most recent inspection (July 2025; Appendix B, item 124). However, Environmental Inspection Reports (Appendix B, items 196–203) confirm that groundcover and soil surfaces have been stabilised and maintained in readiness for the approved Rehabilitation Plan.</li> <li>Environmental Inspection Reports discuss mulch and topsoil rehabilitation works had commenced in watercourse and drainage line areas. No seeding application yet with the Rehabilitation Plan described in the Environmental Inspection Reports (Appendix B, items 121-125) as still in the process of being finalised and approved as at last recent report, July 2025, Appendix B, item 124.</li> </ul>
103.	Rehabilitation will be undertaken progressively, commencing as soon as temporary clearance areas (road batters, cabling routes and temporary facilities) are no longer required for construction.	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) specifies progressive rehabilitation.</li> <li>EPC Contractor weekly and monthly progress reports (Appendix B, items 60-66 and items 24-35 respectively) provide cumulative status updates for progressive rehabilitation completed to date (area finished and percentage complete).</li> <li>Photographs provided in weekly (Appendix B, items 60-66) and monthly (Appendix B, items 24-35) indicates progressive rehabilitation (e.g. topsoil spreading, hydro mulch application and groundcover re-establishment).</li> <li>Seeding and active rehabilitation had not commenced as of the most recent inspection (July 2025; Appendix B, item 124). However, Environmental Inspection Reports (Appendix B, items 196–203) confirm that groundcover and soil surfaces have been stabilised and maintained in readiness for the approved Rehabilitation Plan.</li> <li>Environmental Inspection Reports discuss mulch and topsoil rehabilitation works had commenced in watercourse and drainage line areas. No seeding application yet with the Rehabilitation Plan described in the Environmental Inspection Reports (Appendix B, items 121-125) as still in the process of being finalised and approved as at last recent report, July 2025, Appendix B, item 124.</li> </ul>
104.	All areas will be stabilised using native species.	Compliant	<ul style="list-style-type: none"> <li>Rehabilitation incorporating the use of native flora species is addressed by the Project Rehabilitation Plan (Appendix B, item 237).</li> <li>Monthly progress reports (Appendix B, items 24-35) report on the progress of progressive rehabilitation.</li> <li>Evidence in the Environmental Inspection Reports (Appendix B, items 121-125), rehabilitation methods of mulch and topsoil works were underway, and describes the Rehabilitation Plan as still in the process of being finalised and approved. The reports reflect a clear understanding that the areas are to be suitably seeded (Appendix B, 196-203).</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
105.	Rehabilitation will be undertaken following methods from <i>Revegetation Techniques: A Guide for establishing native vegetation in Victoria</i> (Greening Australia 2003) which includes: <ul style="list-style-type: none"> <li>Direct seeding with soil wetting agents or spray mulches: as soon as site is prepared, sown in spring in areas of medium – high rainfall.</li> <li>Hydro-mulching or hydroseeding: as soon as site is prepared.</li> <li>Aerial seeding: as soon as the site has been prepared, sow in Spring or when soil moisture is elevated following rainfall.</li> <li>Direct seeding by hand: as soon as the site has been prepared, sow in Spring or when soil moisture is elevated following rainfall.</li> <li>Mechanical planting: as soon as the site has been prepared, sow in Spring or when soil moisture is elevated following rainfall.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Reporting against progressive rehabilitation milestones via hydromulch application is provided by monthly progress reports (Appendix B, items 24-35 and 231).</li> <li>Environmental Inspection Reports (Appendix B, items 121-125) discuss mulch and topsoil rehabilitation works had commenced in watercourse and drainage line areas. The Rehabilitation Plan is still in the process of being finalised and approved as at last recent inspection report, July 2025, (Appendix B, item 124).</li> </ul>
106.	Within six months of completion of construction rehabilitated areas will have 70% of the groundcover relative to equivalent undisturbed sites.	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – construction remains underway.</li> </ul>
107.	Topsoil, where available, will be stockpiled and protected separately to support rehabilitation works.	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) specifies separation and management of topsoils for use in rehabilitation.</li> <li>The Environmental Monitoring Plan and Inspection Records (Appendix B, items 46-50) includes checklist items for the separation and management of topsoils for reuse, completed checklists demonstrate general compliance with criteria.</li> <li>Photographs provided in weekly and monthly progress reports (Appendix B, items 60-66 and items 24-35 respectively) demonstrate use of topsoils in progressive rehabilitation.</li> <li>The Monthly Environmental Report (Appendix B, items 96-102) demonstrates where topsoil has been stockpiled, sign posted for rehabilitation, within an exclusion zone (flagged off area).</li> </ul>
108.	Where rehabilitation is not successful: <ul style="list-style-type: none"> <li>Investigate causes of unsuccessful rehabilitation.</li> <li>Use alternative rehabilitation methods including hydroseeding and hydro-mulching.</li> <li>Corrective action to be appropriate to local environmental conditions.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – the rehabilitation criteria timeframe has not elapsed.</li> </ul>
<b>Vehicle access</b>			
109.	Speed limits: <ul style="list-style-type: none"> <li>Vehicles within the Disturbance Footprint will be restricted to 60km/hr in all areas mapped as either Koala habitat or Squatter Pigeon breeding habitat excepting State controlled roads.</li> <li>Speed limit will be reduced to 40km/hr outside of daylight hours.</li> <li>In the event of breach of speed limits undertake speed limit awareness training within 1 week of incident.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) specifies a maximum speed limit of 40 km/hr on access tracks.</li> <li>Speed limit compliance is addressed in item 7(4) of the EPC Contractor's Environmental Monitoring Plan and Inspection Records, completed checklists (Appendix B, items 46-50). Vehicle speed was checked as compliant where checked (four [4] out of five [5] inspections).</li> <li>Awareness training NA – no breaches of speed limits identified.</li> <li>Vehicle movements within the disturbance footprint comply with the specified speed restrictions. Site conditions, including steep terrain, uneven access tracks, and short travel distances between tower pads, inherently limit vehicle speeds below the 60 km/hr and 40 km/hr thresholds outlined for Koala and Squatter Pigeon habitat areas (Appendix B, item 236).</li> </ul>
110.	Vehicle signage will include: <ul style="list-style-type: none"> <li>Squatter Pigeon awareness signage at the entry to breeding habitat.</li> <li>Koala awareness signage during breeding season when the species is highly mobile (October to June) in areas of high value habitat.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Photographs provided (Appendix B, item 150-151) demonstrate signage has been installed at entry / exit of main thoroughfares of the Project development areas highlighting the presence of wildlife within the Project area.</li> <li>Signage promoting awareness of the Squatter Pigeon and Koala was installed, as documented in the July Lotus Creek Monthly Environmental Report (Appendix B, Item 101).</li> </ul>
111.	<ul style="list-style-type: none"> <li>A register of Squatter Pigeon sightings will be maintained to identify current areas that have a risk of collision.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The Squatter Pigeon register was sighted (Appendix B, item 172).</li> <li>The monthly FSC Post Clearance Report (Appendix B, items 108–117) provides a summary table presenting Habitat Values, Features and Fauna Interaction Records.</li> <li>Monthly Environmental Report provides evidence of Squatter Pigeon awareness (Appendix B, items 96 – 102).</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
112.	<p>In the event of injuries or death of threatened fauna due to vehicle strike:</p> <ul style="list-style-type: none"> <li>Log as environmental incident and report to Site Environmental Coordinator.</li> <li>Review risk, amend speed limit, install signage and/or conduct additional staff training.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered - no evidence of injury or death of threatened fauna by vehicle strike associated with the Project was identified by this audit: <ul style="list-style-type: none"> <li>The proponent initiated environmental audit report dated 30/5/25 (Appendix B, item 4) documents item as not triggered – no record of death of a threatened fauna species.</li> <li>Environmental inspection checklists (Appendix B, items 46-50) include a checklist item for disturbance of protected species, item was marked as no impact in all examples provided.</li> <li>Incident records provided relating to injury of fauna (Appendix B, items 73-75) did not include injury or death of a threatened species.</li> </ul> </li> <li>Four (4) fauna vehicle strikes on the public road were reported to the Site Environmental Coordinator, recorded and logged as environmental incidents in accordance with site procedures. Incident reports verified that none of the affected fauna were listed as threatened species (Appendix B, items 219 – 222).</li> </ul>
<b>Erosion and sediment control (including dust)</b>			
113.	Minimise risk of sediment run-off into watercourses:		
113.a)	<p>Erosion and sediment control plans (ESCPs):</p> <ul style="list-style-type: none"> <li>Will address principles set out in International Erosion Control Association (IECA) 2008 Best Practice Erosion and Sediment Control documents (IECA 2008).</li> <li>Will incorporate the use of native flora species to achieve cover and stabilisation goals.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The sample of ESCPs reviewed (Appendix B, items 212-217) were prepared by Certified Practitioners in Erosion and Sediment Control (CPESC) in accordance with the IECA 2008 standard.</li> <li>Rehabilitation incorporating the use of native flora species is addressed by the Project Rehabilitation Plan (Appendix B, item 237).</li> <li>Each tower pad was constructed in accordance with the relevant Low and/or High Risk ESCP, with drainage and Type 2 and 3 controls implemented consistent with the principles of IECA 2008 (Appendix B, item 125).</li> </ul>
113.b)	<ul style="list-style-type: none"> <li>ESCPs will be implemented in accordance with IECA 2008</li> </ul> <p>Note: this item is deemed as encapsulating the generic, non-site-specific controls nominated by Table 7-9 of the MNES MP.</p>	Compliant	<ul style="list-style-type: none"> <li>Environmental inspection records (Appendix B, items 46-50) nominated for completion on a weekly basis, includes a checklist item prompting inspection of erosion and sediment controls (ESCs). Completed checklists demonstrate that controls requiring maintenance are identified and corrective action identified.</li> <li>The proponent initiated second quarter environmental audit report (Appendix B, item 218) undertaken by specialist ESC Consultants recorded a single non-conformance, several partial compliances and observations (including positive observations) and made the following concluding remarks: <ul style="list-style-type: none"> <li>While the majority of requirements are being met, there are several areas where implementation could be strengthened to ensure full alignment with environmental obligations and best practice.</li> <li>The high number of compliant observations demonstrates a solid foundation of environmental management practices onsite, which can be built upon to achieve greater overall compliance and performance.</li> </ul> </li> <li>The proponent initiated audit referred to above, notes prevailing dry conditions at the time of the inspection, reducing the overall erosion and sedimentation risk at the time of the site inspection.</li> <li>Despite instances of recorded deviations from construction ESCPs, routine inspection records (Appendix B, items 46-50, 58 and 211), the dedicated audit by a specialist ESC consultant (Appendix B, item 218) and the logging and close out of sediment related incidents (Appendix B items 56-57), the results of water quality monitoring undertaken at local waterway receiving drainage from the site (Appendix B, items 51, 54 and 55) demonstrates a commitment to, and the achievement of, compliance with the overarching performance criteria nominated by the MNES management plan for sediment run-off being to: <i>Minimise risk of sediment run-off into watercourses.</i></li> <li>ESCPs have been adopted, implemented, and routinely inspected throughout construction, as evidenced in the Environmental Inspection Reports (Appendix B, items 196–203). The reports demonstrate the use of clean water diversions, earthen bunds, and sediment fences consistent with IECA (2008) Best Practice.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
114.	<ul style="list-style-type: none"> <li>Soil stockpiles be located outside of waterways.</li> <li>Soil stockpiles will not be created within 50m of a watercourse (taken to mean a defined water course under the <i>Water Act 2000</i>).</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractors CEMP (Appendix B, item 36) states stockpiling &gt; 10 m from a waterway, the position of stockpiles is not specifically addressed by site specific ESCPs (Attachment B, items 212-217) or inspection checklists (Appendix B, items 46-50). Longsection drawings show evidence of stockpile management design (Appendix B, items 10 and 12).</li> <li>No evidence of stockpiling within 50 m of a watercourse was identified in the proponent initiated Environmental Audit Report (Appendix B, item 218).</li> <li>Environmental Inspection Report (Appendix B, item 122) acknowledges soil stockpiles will not be created within 50 m of watercourses. Watercourses are also identified on maps in the Environmental Work Plans (low impact fish passage streams) Appendix B, items 83-87.</li> </ul>
115.	<p>In the event of erosion and sediment related impacts:</p> <ul style="list-style-type: none"> <li>Review the effectiveness of erosion and sediment control measures.</li> <li>Maintain erosion and sediment control measures as per design criteria.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>Despite gaps identified, the proponent initiated second quarter environmental audit report (Appendix B, item 218) undertaken by specialist ESC Consultants did not report any actual environmental impacts identified by the inspection.</li> <li>The incident report provided for INC33657 involving sediment discharge following a heavy rainfall event (Appendix B, item 56) demonstrated that upon identification of the sediment release, immediate actions were taken to contain and prevent further discharge of sediment, recover sediment deposits from outside of the Project area and assess the sufficiency of controls in place and any reinforcement of controls required. The occurrence was logged within the EPC Contractor's incident management system, investigated and corrective actions were identified and tracked through to completion (Appendix B, item 248).</li> <li>ESCPs have been adopted, implemented, and routinely inspected throughout construction, as evidenced in the Environmental Inspection Reports (Appendix B, items 52, 53, 59 and 196-203).</li> </ul>
116.	<p>In the event of Project dust suppressing growth of vegetation:</p> <ul style="list-style-type: none"> <li>Investigate causes of dust.</li> <li>Increase dust suppression strategies where required.</li> </ul>	NA	<ul style="list-style-type: none"> <li>NA – no incidences of dust suppressing growth of vegetation were identified.</li> <li>NA – no incidences of dust suppressing growth of vegetation were identified.</li> </ul>
117.	<ul style="list-style-type: none"> <li>Erosion, sediment and drainage control measures listed will remain in place until construction works are completed, and surfaces are stabilised and revegetated.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – construction works remain underway.</li> </ul>
<b>Lighting</b>			
118.	<ul style="list-style-type: none"> <li>If undertaking nightworks, lights (both during nightworks and operation where necessary) will be directed away from vegetation and adjacent habitats.</li> <li>Light shields or daily/seasonal timing of construction and operational activities to reduce impacts of light spill.</li> <li>Use best practice light design in accordance with the National Light Pollution Guidelines (DoEE 2020) (static lighting).</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) specifies directional lighting, the use of screens, modification of height / colour and monitoring of light levels to avoid light nuisance.</li> <li>No construction works were undertaken at night, dayshift works only as indicated in daily pre-start records (Appendix B, items 92-95).</li> <li>Night works were undertaken for thermal drone survey of fauna (Appendix B, items 108-117) conducted in line with the Koala Biodiversity Assessment Methodology Survey Guide.</li> </ul>
<b>Monitoring (general)</b>			
119.	<p>Monitoring will be undertaken to observe and report on the performance of proposed mitigation and management measures and performance indicators, with a focus on demonstrating:</p> <ul style="list-style-type: none"> <li>'Early-control' (that management actions are effective) and 'early warning' (corrective actions are required) functions, with respect to the performance targets.</li> <li>Early intervention and remediation of potential or realised non-conformances. Non-conformances include failure to achieve the Plan objectives as measured by the Plan's performance targets and management triggers. The monitoring program will inform adaptive implementation and demonstrate whether the management objectives for protected matters have been, or are likely, to be met.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>An Environmental Audit undertaken in January 2025 (Appendix B, Item 193) confirmed compliance against relevant Environmental Aspects from the CEMP (Appendix B, item 36). Reviews of weekly monitoring and inspection records (Appendix B, Items 46-50) verified that performance indicators and controls were effectively implemented in accordance with the CEMP (Appendix B, item 36).</li> <li>Monitoring demonstrated early-control of management actions and early-warning of potential issues, enabling prompt corrective responses. No material non-conformances were identified. Minor observations were addressed through adaptive management, confirming that management objectives and performance targets for protected matters are being met (Appendix B, Item 193).</li> <li>Checklist-based assessments in the Environmental Action Register ((Appendix B, item 126) and Environmental Inspection Reports (Appendix B, items 121-125) verify compliance, confirm implementation meets the intent of the condition, and support early control, corrective action, and adaptive management to achieve performance targets and protected matter objectives.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
120.	Suitably qualified personnel will design and conduct monitoring and survey activities and analyse monitoring results.	Compliant	<ul style="list-style-type: none"> <li>The LCWF Project Environmental Professional, responsible for developing and rolling out the Project environmental assurance program holds appropriate qualifications (Appendix B, item 249).</li> <li>LCWF initiated third party audits (Appendix B, items 4 and 218) were conducted by suitably qualified specialist consultants.</li> <li>The EPC Contractor employed a qualified environmental practitioner (Appendix B, item 229) on a site roster who undertook environmental monitoring activities during the reporting period (Appendix B, items 46-50).</li> <li>The subcontractor engaged two (2) environmental contractor groups who undertook environmental monitoring activities during the reporting period with credentials provided in Clearance Survey Reports (Appendix B, items 89-90).</li> </ul>
<b>Audit and review</b>			
121.	<p>Audits will be undertaken at regular intervals throughout construction (within 2 months of construction commencing and every 6 months thereafter) and operations (annually). Specific to the MNES MP, audits will focus on:</p> <ul style="list-style-type: none"> <li>Compliance with environmental and planning conditions, including the application of the MNES MP. This will include (but is not limited to) those performance indicators listed in Table 9-1 (of the MNES MP).</li> <li>Document control and review.</li> <li>Incident reporting and closure.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>An internal audit was completed by the EPC Contractor in January 2025 (Appendix B, item 193) addressing MNES MP compliance.</li> <li>Assurance activity (daily construction reports) was undertaken within two months of the commencement of construction (Appendix B, items 250 and 251).</li> <li>The LCWF initiated third party audit (Q1) conducted in April 2025 (Appendix B, item 4) addresses MNES MP compliance and satisfies the six (6) monthly audit requirements.</li> <li>The LCWF initiated third party audit (Q2) conducted in September 2025 (Appendix B, item 218) addresses MNES MP compliance and satisfies the six (6) monthly audit requirements.</li> <li>This audit satisfies the six (6) monthly audit requirement and confirms that: <ul style="list-style-type: none"> <li>Document control and review processes are in place, demonstrated by document numbering, ownership and revision history information provided by management plans detailed in the CEMP (Appendix B, item 36).</li> <li>Processes for incident reporting and closure are in place, demonstrated by the HSE Incident and Actions Register (Appendix B, item 37) and copies of incident reports provided (Appendix B, items 56-57, 73-75 and 206-2010).</li> </ul> </li> <li>No formal MNES MP audits have been undertaken however several monthly environmental inspections have been completed by the subcontractor since the commencement of construction.</li> <li>Inspections monitored compliance with environmental and planning conditions, including MNES MP performance indicators, document control, and incident management. The inspection findings may be used to inform future audits and help demonstrate adherence to MNES MP requirements, as reflected in the Environmental Inspection and Monthly Reports (Appendix B, items 121–141).</li> </ul>
122.	<p>Five (5) yearly interim reviews:</p> <ul style="list-style-type: none"> <li>will summarise the results of weed and pest monitoring and any corrective actions that have been implemented. The report will review effectiveness of controls and corrective actions implemented.</li> <li>will summarise the results of monitoring of installed Greater Glider hollows and nest boxes and any corrective actions that have been implemented. The report will review effectiveness of those corrective actions.</li> <li>Will summarise the results of monitoring of Glider pole usage and any corrective actions that have been implemented. The report will review effectiveness of those corrective actions.</li> </ul>	NA	<ul style="list-style-type: none"> <li>Requirement not triggered – five (5)-year timeframe has not elapsed.</li> </ul>



Item	Requirement	Compliance designation	Discussion / evidence
<b>Training</b>			
123.	<p>Training for personnel on matters outlined in the Plan will be communicated through the following means as required:</p> <ul style="list-style-type: none"> <li>• Environmental induction.</li> <li>• Toolbox talks, training and awareness.</li> <li>• Environmental awareness training.</li> <li>• Daily Pre-Start meetings.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>• The EPC Contractor's CEMP (Appendix B, item 36) requires all workers to complete site inductions, including an environmental induction (Module 4). The LCWF Site Induction and ACS Complete Project Induction covers MNES requirements in the environmental risk management module (Appendix B, items 227 and 236).</li> <li>• Squatter Pigeon (Appendix B, items 149 and 179), weeds awareness (Appendix B, item 226) and clearing activities (Appendix B, item 19) toolbox records demonstrate communication of MNES requirements.</li> <li>• Permits to Disturb and Environmental Works Plans (Appendix B, Items 79–87) demonstrate communication of Squatter Pigeon, Greater Glider, and Koala habitat sensitivities prior to clearing.</li> </ul>
124.	Internal training will occur for all personnel involved in the vegetation clearing phase to ensure they are aware of the approved works areas, the requirements they need to meet, and sensitivity of the area for MNES.	Compliant	<ul style="list-style-type: none"> <li>• VDPs (Appendix B, items 10-17) include information pertaining to MNES species and clearing limits with signed acknowledgement demonstrating vegetation clearing personnel have received and understood the information provided.</li> <li>• Permits to Disturb and Environmental Works Plans (Appendix B, Items 79–87) demonstrate communication of MNES sensitivities prior to clearing including inductions, attendance, and toolbox talks, all retained for audit verification (Appendix B, Item 236).</li> </ul>
125.	<p>Educate on-site staff of life-cycle timeframes for the applicable MNES species prior to clearing, i.e.:</p> <ul style="list-style-type: none"> <li>• Koala – Breeding can occur year-round for Koala, with a higher concentration of births in December-March in northern areas of Qld that experience greater seasonality to rainfall. Weening occurs 12 months after birth and is thus on the same cycle (DAWE 2022).</li> <li>• Greater Glider – Births occur from March to June (DCCEEW 2022).</li> <li>• Squatter Pigeon – Breeding can occur through most of the year. Peak breeding period is not fixed but is likely to coincide with the dry season (April to October) when food (grass seed) is most abundant (DoE 2024).</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>• Squatter Pigeon toolbox records (Appendix B, items 149 and 179) demonstrate promotion of Squatter Pigeon awareness in line with the intent of the requirement.</li> <li>• Greater Glider and Koala species information is included in VDPs information where clearing occurs in their respective habitats (Appendix B, items 10-17).</li> <li>• Permits to Disturb and Environmental Works Plans (Appendix B, items 79-87 respectively) demonstrate promotion of Squatter Pigeon, Greater Glider and Koala species information where clearing is to occur in their respective habitat areas.</li> </ul>
126.	<p>Site inductions will include:</p> <ul style="list-style-type: none"> <li>• information on MNES species that have the potential to occur within the Project area.</li> <li>• information and training on weed and pests, including identification and measures to prevent spread.</li> <li>• impacts of traffic strikes on native fauna.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>• LCWF site induction (Appendix B, item 227) provides information pertaining to all specified content.</li> <li>• The subcontractors maintains training logs ensuring consistent delivery and documentation of environmental induction content. Induction materials, cover MNES species in the Project area, weed and pest identification/control, and the impacts of traffic strikes on native fauna (Appendix B, items 227 and 236).</li> <li>• Environmental induction slides, attendance records, and toolbox talks are retained at the nominated file location for audit verification (Appendix B, items 236).</li> </ul>
127.	<p>Where staff are not following their training leading to impacts on native vegetation and threatened fauna:</p> <ul style="list-style-type: none"> <li>• Implement site wide induction and retraining for all staff on environmental issues in instances of non-compliance.</li> <li>• Increase environmental compliance inspections.</li> <li>• Distribute this Plan as part of inductions to site.</li> </ul>	NA	<ul style="list-style-type: none"> <li>• Impacts to MNES flora and fauna were not identified by: <ul style="list-style-type: none"> <li>– The EPC Contractor's HSE Incidents and Actions Register for August 2025 (Appendix B, item 37).</li> <li>– LCWF Monthly Reports for the period October 24 to August 25 (Appendix B, items 24-35) which provide a cumulative log of environmental incidents and non-conformances.</li> <li>– The EPC Contractor's internal audit (Appendix B, item 193).</li> <li>– LCWF initiated third party audits (Appendix B, items 4 and 219).</li> </ul> </li> <li>• Environmental incident records (Appendix B, Items 232–235) and monthly inspections (March–September 2025) confirm that some retraining and induction refreshers were implemented following non-compliances. Environmental inspections were increased, and the Environmental Management Plan redistributed to reinforce protection of native vegetation and threatened fauna.</li> </ul>





Item	Requirement	Compliance designation	Discussion / evidence
<b>Incidents, non-conformances, monitoring outcomes and corrective actions</b>			
128.	If monitoring or opportunistic observations indicate that a risk has been realised, a contingency response will identify appropriate and tailored corrective actions to rectify the specific event or circumstance, and outcomes communicated to relevant Project personnel.	NA	<ul style="list-style-type: none"> <li>The EPC Contractor's CEMP (Appendix B, item 36) requires: <ul style="list-style-type: none"> <li>investigation of all incidents to identify root cause and provide corrective actions.</li> <li>logging and tracking of corrective actions are captured in a database via 'Donesafe' (Appendix B, items 207, 208, 210, and 211).</li> </ul> </li> <li>The EPC Contractor's HSE Incidents and Actions Register for August 2025 (Appendix B, item 37) provides a cumulative register of logged hazards and incidents for the reporting period, documents investigation findings for environmental hazards and includes an actions log. Nil incidents involving MNES values or non-conformances with EPBC criteria are recorded.</li> <li>Monitoring and incident reviews confirm that contingency responses and corrective actions are implemented where risks are realised. All incidents are logged in PQ Switch, reviewed and follow-up or preventative measures are issued to contractors as required. Only minor incidents have occurred, with no regulatory reporting required (Appendix B, items 232 – 235).</li> </ul>
129.	<p>Upon detection, any of the following will trigger immediate steps to control the non-conformance and immediate reporting, investigation of the non-conformance and development of additional controls to prevent re-occurrence:</p> <ul style="list-style-type: none"> <li>Failing to comply with the environmental regulations or license/permit conditions.</li> <li>Failure to implement commitments in the approved Plan or other environmental requirement.</li> <li>Carrying out work practices that have the potential to cause harm to threatened species.</li> <li>Activities that have caused actual harm to the environment not permitted by the Project approvals or covered in the environmental assessment or management documentation.</li> <li>Deficiencies or concerns raised by client representatives and/or state and local authorities or agencies.</li> </ul> <p>A response will be developed in consultation with relevant stakeholders (e.g. DCCEEW if triggered) and will be assigned to the appropriate personnel for close out.</p>	NA	<ul style="list-style-type: none"> <li>NA – none of the criteria triggers for action were recorded during the reporting period by: <ul style="list-style-type: none"> <li>The EPC Contractor's HSE Incidents and Actions Register for August 2025 (Appendix B, item 37).</li> <li>LCWF Monthly Reports for the period October 24 to August 25 (Appendix B, items 24-35) which provide a cumulative log of environmental incidents and non-conformances.</li> <li>The EPC Contractor's internal audit (Appendix B, item 193).</li> <li>LCWF initiated third party audits (Appendix B, items 4 and 218).</li> <li>The sample of logged incident records provided to inform this audit (Appendix B, items 56-57, 73-75 and items 207, 208, 210, and 211).</li> </ul> </li> <li>NA – none of the criteria triggers for action were recorded during the reporting period by: <ul style="list-style-type: none"> <li>Environmental Incident events 2025 sample of logged incident records provided (Appendix B, items 232 – 235).</li> <li>Inspections and audits, reported monthly with evidence provided from March to September 2025 (Appendix B, item 232).</li> </ul> </li> </ul>
130.	Records will be kept of all corrective actions and follow-up processes to ensure close-out.	Compliant	<ul style="list-style-type: none"> <li>EPC Contractor's HSE Incidents and Actions Register for August 2025 (Appendix B, item 37) and the sample of logged incident records provided (Appendix B, items 56-57, 73-75 and items 207, 208, 210, and 211) demonstrate a process in place for tracking corrective actions as required by the criteria.</li> <li>Environmental Incident events 2025 sample of logged incident records provided (Appendix B, items 232 – 235) demonstrate a process is in place for tracking corrective actions as required by the criteria.</li> </ul>
131.	<p>Environmental incidents will be recorded and reported in a number of ways:</p> <ul style="list-style-type: none"> <li>As identified during inspections, audits or routine observations.</li> <li>Recorded on the Environmental Incidents Register (and if required by Law, reported to the regulator).</li> <li>Communicated to workers during toolbox talks to share lessons learnt.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>The EPC Contractor's HSE Incidents and Actions Register for August 2025 (Appendix B, item 37) provides a cumulative register of logged hazards and incidents for the reporting period, including eight (8) environment related hazards and incidents.</li> <li>LCWF Monthly Reports for the period October 24 to August 25 (Appendix B, items 24-35) provide a cumulative log of environmental incidents / non-conformances and summary details of those occurring within the month.</li> <li>All environmental incidents are reported to the Site Environmental Coordinator and logged in the subcontractor's HSE tracking system in accordance with site procedures, including inspections and audits, reported monthly with evidence provided from March to September 2025 (Appendix B, item 232).</li> </ul>





Item	Requirement	Compliance designation	Discussion / evidence
<b>General reporting requirements</b>			
132.	Annual compliance report: <ul style="list-style-type: none"> <li>a. Submission, publishing and content as per CoA 58</li> <li>b. Additional to CoA 58, the compliance report will set out the following for the reporting period:               <ul style="list-style-type: none"> <li>i. Impact avoidance, mitigation and/or rehabilitation measures implemented</li> <li>ii. The timing of implementation of the above measures, and an assessment of the effectiveness of those measures</li> <li>iii. Management triggers detected and risks realised, contingency response/s and corrective actions implemented</li> <li>iv. An evidence-based assessment of whether and to what extent the Plan is achieving the plan's objectives.</li> </ul> </li> </ul>	Compliant	<ul style="list-style-type: none"> <li>a. Refer to Table 3.2, condition 58.</li> <li>b. As follows:               <ul style="list-style-type: none"> <li>i. This annual compliance report discusses the avoidance, mitigation and rehabilitation measures implemented.</li> <li>ii. This annual compliance report discusses the timing of measures implemented. This audit did not identify any unauthorised impacts to MNES, therefore the measures identified by the MNES MP are deemed as sufficiently effective.</li> <li>iii. NA – no exceeded management triggers or realised risks were identified by this audit.</li> <li>iv. This annual compliance did not identify any unauthorised impacts to MNES, therefore the measures identified by the MNES MP are deemed as sufficiently effective.</li> </ul> </li> </ul>
133.	A 5 yearly interim milestone report (every 5 years from commencement of the action) will be prepared which <ul style="list-style-type: none"> <li>• Report on actions undertaken in accordance with requirements of this Plan, any incidents, and updates to the Plan.</li> <li>• Publish report to website with notification to DCCEEW by email.</li> </ul>	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered; five (5) year reporting timeframe has not elapsed.</li> </ul>
134.	Reporting of non-conformance as per CoA 59 and 60.	Compliant	<ul style="list-style-type: none"> <li>• See responses to CoA 59 and 60 provided in <b>Table 3.2</b></li> </ul>
135.	Additional reporting may be necessary as the works progress. In such a circumstance, the MNES MP will be amended to reflect these changes (management plan updates to be in accordance with CoA as per <b>Table 3.2</b> ).	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – additional reporting requirements have not been identified.</li> </ul>
<b>Other / general</b>			
136.	Fencing: <ul style="list-style-type: none"> <li>• Wildlife friendly fencing to be used where possible to ensure Koalas can move through the landscape.</li> <li>• Where new fencing is required by the Project that may intersect with Greater Glider habitat, wildlife friendly fencing will be used (no barbed wire on the top strand).</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>• Fencing constructed to date are the boundary fences delineating landowner properties (Appendix B, items 240 and 241) and temporary fencing around construction excavations (Appendix B, item 252).</li> </ul>
137.	Allow natural regeneration of native grasses under powerlines and other infrastructure to provide foraging opportunities for Squatter Pigeon.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered; post construction ground condition.</li> </ul>
138.	Where breeding activity or nests of MNES species are discovered, cease or delay construction activity in the area until activity has concluded.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered – breeding activity or nests of MNES species have not been discovered as demonstrated by this report.</li> </ul>
<b>Decommissioning</b>			
139.	At the end of the operational life of the Project Lotus Creek Wind Farm will decommission the Wind Farm. A decommissioning and rehabilitation MNES Management Plan will be created and provided to the department for Ministerial approval at least 6 months prior to the commencement of decommissioning activities.	NA	<ul style="list-style-type: none"> <li>• Requirement not triggered; decommissioning is not scheduled to commence within six (6) months of the reporting period. A Decommissioning and Rehabilitation MNES Management Plan will be developed and submitted approval six months prior to the commencement of any decommissioning activities.</li> </ul>



## 4. Correcting non-compliances

One non-compliance occurred in the reporting period relating to Condition 7(d):

- *The offset area will be secured through a voluntary declaration under the Vegetation Management Act 1999 (VM Act) within 12 months after the commencement of the Action (as per CoA 7d).* The offset was not legally within the prescribed timeframe.
- The same non-compliance applied to the associated commitment in the Offset Area Management Plan (OAMP). Administrative actions progressed, but the requirement was not met within the period.

### Department Notification

The Department of Climate Change, Energy, the Environment and Water was notified on the 15/09/25 via email to [EPBCMonitoring@environment.gov.au](mailto:EPBCMonitoring@environment.gov.au) (Compliance Monitoring Section) of the delay in achieving compliance with Condition 7(d).

### Detection

An application for a Voluntary Declaration under the Queensland *Vegetation Management Act 1999* (VM Act) was submitted to the Queensland Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development (DNRMMRRD) on 30/1/25, evidenced by letter from DNRMMRRD to the landholder however, approval remained outstanding at the end of the specified 12-month timeframe.

### Corrective Measures

The nominated offset areas were secured through Option agreements with landholders, ensuring that no clearance, damage or harm to native vegetation or habitat and no change to existing farming practices was able to occur within the offset area, thus biodiversity values present have been maintained and no impacts to Matters of National Environmental Significance (MNES) have resulted from the delay.

Correction has subsequently been achieved through finalising and submitting the outstanding offset documentation and completing the legal securing of the Offset Area, including execution of required legal instruments and landholder agreements.

A Declaration over the offset area was made by DNRMMRD on 27/10/25.



## 5. Conclusion

This Annual Compliance Report has been prepared for the Lotus Creek Wind Farm Project in accordance with the conditions of approval issued under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval (EPBC 2020/8867).

The compliance assessment involved a detailed review of records generated during the reporting period (16 September 2024 to 15 September 2025), as listed in Appendix B.

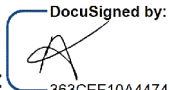
A total of 78 approval conditions and 139 management plan requirements were assessed for compliance. Of these, 112 conditions were deemed not applicable as the related project activities (e.g., commissioning, decommissioning) were not triggered during the reporting period. Of the 105 applicable conditions, 103 were assessed as compliant.

One condition was identified as non-compliant relating to Condition 7. (d), which concerns the timely submission and legal securing of the environmental offset area. Although administrative processes were actively progressed, this requirement was not fully achieved within the reporting period. In addition to the non-compliance with a condition, the same non-compliance occurred with a commitment in the Offset Area Management Plan.



## 6. Declaration of Accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed:  363CEF10A4474A7...

Full name: Andrew Wilson

Position: Head of Renewables and Farming Development

Organisation: CS Energy (ABN: 54 078 848 745; CAN: 078 848 745)

Date 08 December 2025 | 12:58:52 AEST

The logo for Attexó, featuring the word "Attexó" in a bold, sans-serif font. The "At" is in orange, and "texó" is in dark grey. The background of the slide features a pattern of diagonal stripes in orange and grey, with some stripes being solid and others having a subtle gradient.

**Attexó**

# **Appendix A**

## Definitions



Table A.1: Definitions

Term / acronym	Definition
BACI	Before-After, Control-Impact
BBMP	Bird and bat management plan
BMP	Bushfire management plan
BoP	Balance of Plant
BPP	Blue Power Partners
CEMP	Construction environmental management plan
CoA	Conditions of Approval
CPESC	Certified Practitioners in Erosion and Sediment Control
DBH	Diameter at breast height
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DNRMMRRD	Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development
EA	Environmental authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ESC	Erosion and Sediment Control
ESCPs	Erosion and sediment control plans
EPC	Engineering, Procurement, and Construction
EWP	Environmental work plans
FSC	Fauna spotter catcher
ha	hectares
HBT	Hollow bearing tree
IECA	International Erosion Control Association
km	kilometres
LCWF	Lotus Creek Wind Farm
m	metres
MNES	Matters of National Environmental Significance
MP	Management plan
NA	Not applicable
NC Act	<i>Nature Conservation Act 1992</i>
OAMP	Offset Area Management Plan
OHTL	Overhead transmission line
QRFS	Queensland Fire and Rescue Services
SARA	State Assessment and Referral Agency
SLCR	St Lawrence–Croydon Road



Term / acronym	Definition
SMART	Specific, measurable, achievable, relevant and timed
SQP	Suitably qualified person
WoNS	Weeds of national significance
WTG	Wind turbine generator
WTNT	White-throated Needleetails
VDP	Vegetation Disturbance Permits
VM Act	<i>Vegetation Management Act 1999</i>



# Appendix B

## Evidence list