

13 October 2023



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

Dear Planning Secretary,

**Re: Boco Rock Wind farm (MP 09-0103 Mod 1) – Independent Environmental Audit #1**

An Independent Environmental Audit (IEA) was undertaken on behalf of Boco Rock Wind Farm Pty Ltd (BRWF) to meet the requirements of Condition 2, Schedule 4 of State Significant Development Approval MP 09-0103 Mod 1.

The IEA was undertaken on site by SNC-Lavalin Consulting (SNC) on 22 August 2023. The audit team comprised Richard Peterson and Alistair Smith from SNC, who were accompanied on site by Zeina Jokadar and David Laing representing Boco Rock Wind Farm.

Please see below BRWF response to the findings and recommendations that have been provided in Section 4.9 and the Executive Summary, respectively of the Audit report.

**Table 1 SNC Lavalin Audit findings**

IEA Findings	BRWF Proposed action and timing
The project has a documented Operational Environmental Management Plan including specialist subplans that address the key environmental issues. Sufficient evidence was provided that the management plans are effectively being implemented.	BRWF continues to implement the OEMP for the project to ensure that all environmental matters at the site are managed in accordance with NSW MP 09-0103 Mod 1 Approval.
The site has been rehabilitated following the construction of Stage One, resulting in significant mitigation of environmental risks for dust, erosion, and water pollution.	BRWF notes that monthly monitoring of rehabilitated areas is undertaken in accordance with CoA 2.8.
A total of nine complaints were recorded in the complaints register since May 2018, with all of them recorded as closed out and no outstanding actions during the audit period.	BRWF notes a postal address, email address and 24hr telephone number are provided on the project website and entrance sign, for receiving complaints in accordance with CoA5.3 BRWF maintains a Complaint Register in accordance with CoA5.4.
One self-reported non-compliance was identified, which was reported to DPE and recorded with no further action required.	BRWF continues to manage and monitor the reporting requirements and timeframes in a Project based Compliance Tracking Matrix.

**Table 2 Independent Audit recommendations and proponent's response**

IEA Recommendation	BRWF response and proposed action
General reporting and notification timeframes Ensure all future submissions of documents comply with DPE requirements for reporting timeframes	BRWF has developed a Compliance Matrix which lists all the conditions of consent and tracks the types of submissions, timelines and due dates. This Compliance Matrix is reviewed and updated fortnightly. BRWF will continue to ensure that the Matrix is up to date and reporting timeframes are clearly indicated.

IEA Recommendation	BRWF response and proposed action
<p><b>CoA 2.32 – Bushfire Risk</b></p> <p>Conduct a pre-bushfire season readiness review to ensure all the obligations made relating to fire prevention and emergency management are implemented and are fully functioning.</p>	<p>BRWF currently undertakes the following actions:</p> <p>The site is inspected monthly against the environmental factors outlined in the Conditions of approval (dust, noise, erosions, waste, weeds, vegetation rehabilitation).</p> <p>The site maintains the asset protection zones around the O&amp;M and substation.</p> <p>Fire alarms within the buildings are inspected monthly. Fire extinguishers are inspected every 6 months.</p> <p>BRWF has undertaken consultation with RFS for the Emergency Response Plan (ERP) update and will consider their recommendations.</p> <p>The ERP is periodically reviewed to ensure the management measures and response procedures are suitable for the identified environmental risks.</p> <p>The Pollution Incident Response Management Plan is tested and revised annually.</p> <p>BRWF proposes to undertake the following additional actions:</p> <ul style="list-style-type: none"> <li>• In accordance with the request from the EPA, the PIRMP will be updated by end of November 2023, to address any potential risks or issues that may occur at the BRWF due to a bushfire.</li> <li>• Annually, prior to the bushfire season, BRWF will inquire with the RFS if they have any comments regarding the risk of bushfire at the site and if a site visit is requested.</li> </ul>
<p><b>CoA 5.4 Complaints Management</b></p> <p>For any future publication of complaints, provide more detail on the complaints register regarding the nature of the complaint and the specific actions taken to close the complaint out. There is currently limited information in the publicly available complaints register.</p>	<p>BRWF manages a Complaints Register in accordance with CoA5.3. The internal Register includes more detail regarding the nature of the complaint and the actions taken to resolve the issue. For confidentiality purposes, the public register which is available on the project’s website, provides a summary of the complaint.</p> <p>For any future complaints, BRWF will provide additional detail regarding the nature of the complaint and the measures taken, where a breach of confidentiality is not likely to occur.</p>

I trust that the Independent Environmental Audit meets the requirements of the Department in addressing Condition 2 of Schedule 4. BRWF will make the audit report publicly available on the Boco Rock Wind Farm project website, along with the summary of recommendations/observations and responses provided in Table 2 and Table 1.

Please do not hesitate to contact me to discuss further on [REDACTED]

Yours sincerely,

Zeina Jokadar  
 Environmental Advisor  
 For and behalf of Boco Rock Wind Farm Pty Ltd ACN 137 886 750