



Aldoga Solar Farm EPBC Audit (EPBC 2020/8773)

Independent Auditor's Report

Prepared for: Acciona Energy Australia Global Pty Ltd

Date: 6/02/2025



Document information

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Prepared by	Nick Travers
Reviewed by	Jeromy Claridge

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Rev	Date	Details	Authorisation	
			Name/position	Signature
A	30-01-2025	Issued for review	Nick Travers, Principal Environmental Consultant	
B	06-02-2025	Issued as final	Jeromy Claridge, Principal Environmental Scientist	

Prepared for:

Acciona Energy Australia Global Pty Ltd

Prepared by:

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Attexo Group Pty Ltd 2025

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Executive Summary

Attexo Group Pty Ltd were engaged by the Acciona Energy Australia Global Pty Ltd (Acciona) to undertake an independent audit of Acciona's compliance with the conditions of EPBC Approval No. 2020/8773 (the approval) for the Aldoga Solar Farm Project (the Project), near Gladstone QLD.

This audit report has been prepared to satisfy Conditions 32 and 33 of the approval (as amended on 12 September 2024), being to assess the compliance status against:

- each numbered condition and sub-condition within the approval; and
- each commitment made in the action management plans required under the approval, being the:
 - Offset Area Management Plan – Aldoga South
 - Offset Area Management Plan – Aldoga North
 - Matters of National Environmental Significance Management Plan (MNES Management Plan).

This audit and audit report is for the **first audit period** (the first 12-month period following commencement of the Action), being for **13 November 2023 – 13 November 2024**.

The audit and audit report were prepared in accordance with the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) Independent Audit and Audit Report Guidelines (2019).

A summary of the conditions and management plan commitments audited, and Auditor findings, is presented in **Table 1.1** to which is noted that:

- these criteria represent conditions, sub-conditions and commitments that could be effectively audited; and
- significant overlap and duplication of audit criteria exists between the conditions of approval and the MNES Management Plan commitments, and likewise within the MNES Management Plan itself, which inflates the number of overall criteria and associated audit findings.

Table 1.1: Independent Audit – Findings Summary

Instrument	Total Audit Criteria	Findings Summary		
		Not applicable	Compliant	Non-Compliant
EPBC Approval No. 2020/8773	117	44	73	0
Offset Area Management Plan – Aldoga South	9	9	---	---
Offset Area Management Plan – Aldoga North	9	9	---	---
MNES Management Plan	103	20	83	0



No non-compliance findings were identified against the conditions of approval or commitments made within the MNES Management Plan.

No findings could be made in relation to commitments within the Offset Area Management Plans (OAMPs), as these only become effective when the offsite sites have been legally secured, and the subsidiary Offset Area Operational Plans (OAOPs) implemented. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites identified in the OAMPs, and thus the OAOPs are still in development and are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered).

Audit Team and Auditor Certification

The audit, and this audit report, has been prepared by Nick Travers and reviewed by Jeromy Claridge.

The audit team are both employed by Attexo Group Pty Ltd, an independent company, unaffiliated with the approval holder, Acciona Energy Australia Global Pty Ltd, for which this audit report has been prepared to satisfy Condition 32 of *Environment Protection and Biodiversity Conservation Act 1999* (EPBC) Approval No. 2020/8773.

Independent Auditor Certifications for each member of the Audit Team are provided below.



Auditor Report – Auditor’s Certification

Auditor Details

Name	Jeromy Claridge
Position	Principal Environmental Scientist
Company	Attexo Group Pty Ltd
Qualifications	MEnvMgt BSc (Hons)
Experience	Jeromy is a Certified Environmental Practitioner (CEnvP) with over 25 years of experience providing environmental advice through all project development phases from preliminary planning and approvals through to on-site environmental management for both asset construction and operations. Jeromy has comprehensive knowledge and understanding of environmental legislation at the Commonwealth, state, and local government levels. Jeromy has managed complex multidisciplinary environmental assessments, undertaken extensive consultation with government agencies at all levels, and both delivered and directed environmental management and compliance functions for a range of projects. Jeromy has experience undertaking audits and preparing compliance reports for various clients, including those within the renewable energy and natural resources industries.

Auditor’s Declaration

I, **Jeromy Claridge** of **Attexo Group Pty Ltd**, for environmental audits that are required by a condition of an *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval, certify that to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature	
Date	06-02-2025



Auditor Report – Auditor's Certification

Auditor Details

Name	Nick Travers
Position	Principal Environmental Consultant
Company	Attexo Group Pty Ltd
Qualifications	BSc (Hons) (Env. Mgt)
Experience	Nick has 21 years' experience as an environmental professional in Australia spanning the waste, energy and mining sector across Australia. Nick has prior Lead Auditor training under the former RABQSA (now Exemplar Global) auditor training program and has relevant experience undertaking compliance audits against statutory approvals and environmental management systems. This includes leading both internal and external (independent) compliance audits, participation in EHS management system surveillance and (re)certification audits, and participation in compliance audits led by statutory authorities.

Auditor's Declaration

I, **Nick Travers** of **Attexo Group Pty Ltd**, for environmental audits that are required by a condition of an *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval, certify that to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature	
Date	06-02-2025



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1. Audit Details

1.1 Project background

The Aldoga Solar Farm Project (the Project) is a solar photovoltaic (solar PV) farm being developed by Acciona Energy Australia Global Pty Ltd (Acciona). The Project area, located within Aldoga, is approximately 20 km northwest of Gladstone, Queensland and comprises Lot 2 SP301578, Lot 1 SP307522, Lot 1 SP157677 and Lot 1 SP260750. The Project is located on freehold land, within the Gladstone State Development Area (GSDA). The Site is bound by Cullen Road to the north and north-east, Gladstone-Mt Larcom Road to the south and The Narrows Road to the west and north-west.

The Project is planned to utilise up to 1,000,000 solar PV modules (~2 m x 1 m) installed in regular north-south, parallel arrays and mounted upon metal mounting structures. The mounting structures are expected to be piled or screwed into the ground to a depth of 2.5 m to 4.0 m and would be 2.5 m to 3.0 m above ground level at the highest point.

In addition to the solar array, the Project will also comprise:

- perimeter fencing (approximately 1.8 m high)
- construction and operational access/egress points
- internal access roads
- medium-voltage reticulation
- a construction office / laydown area
- an operation and maintenance building and warehouse
- a solar farm substation
- a battery energy storage system (BESS).

Acciona received development approval (AP2020/006) from the Office of the Coordinator-General (OCG) to construct the Project on 19 July 2021.

1.2 Project status

At time of audit project construction works have been substantially progressed. The status of key construction activities, as of December 2024, is as follows:

- all clearing and grubbing works completed
- all bulk earthworks have been completed
- 97% of internal access roads constructed
- 96% of solar array foundation piling completed
- 68% of mechanical installation and 60% of solar module installation completed



- 91% of medium voltage trenching and cable installation completed
- 98% of direct current trenching and cable installation completed
- 36 Power Conversion Unit (PCU) foundations poured, 24 PCUs placed and 7 terminated
- substation construction 85% complete – all major components have been delivered and scheduled for energisation by 15 February 2025
- 320 of 486 megawatts installed, progressing at a rate of 25 MW installed per week (7,500 solar panels per day) with a peak construction workforce of 580 persons.

It is expected that several of the above key construction activities will have been fully completed prior to lodgement of the enclosed audit report.

1.3 Approval Holder details

A summary of the Approval Holder's details is provided in Table 1.1.

Table 1.1: Approval Holder Details

Approval Holder	Details
EPBC Project Name	Aldoga Solar Farm Project, near Gladstone, QLD
EPBC Approval Reference	EPBC 2020/8773
Approval Holder	Acciona Energy Australia Global Pty Ltd
ACN	600 910 647
Contact	Meagan Kay
Address	Level 38, 360 Elizabeth Street Melbourne, VIC, 3000 Australia
Phone Number	+61 400 639 735
	meagan.kay@acciona.com

1.4 Audit Scope, Criteria and Methodology

This audit report has been prepared to satisfy Conditions 32 and 33 EPBC Approval 2020/8773 (as amended on 12 September 2024) ('the approval'), being to assess the compliance status against:

- each numbered condition and sub-condition within the approval; and
- each commitment made in the action management plans required under the approval, being the:
 - Offset Area Management Plan – Aldoga South



- Offset Area Management Plan – Aldoga North
- Matters of National Environmental Significance Management Plan (MNES Management Plan).

These approval conditions and action plan commitments are the audit criteria.

The audit report addresses the requirements of the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) *Independent Audit and Audit Report Guidelines (2019)* ('the guidelines'), with exception that Condition 32 of EPBC Approval 2020/8773 does not require the Approval Holder to receive the DCCEEW's prior written approval regarding the selection and appointment of the independent auditor or the audit scope, audit criteria and methodology ordinarily required per sections 5.5 and 5.8 of the guidelines.

The audit process included:

- development of detailed criteria and commitments tables, and plan for evidence collection
- preparation of an audit plan outlining:
 - the proposed audit approach
 - evidentiary requirements (Approval Holder documents to be sighted)
- detailed audit and reporting, including:
 - review of documentation
 - visual site inspection, undertaken on 4th December 2024
 - audit report compilation and submission to Approval Holder (Acciona Energia) for forward submission to DCCEEW.

Detailed audit findings for each audit criterion including the verification approach, evidence sighted, and compliance finding are presented in **Section 2**.

Consistent with the guidelines, the following assessment determination criteria have been applied:

- **COMPLIANT** – given when the auditee has complied with a condition, element of a condition, or measure (commitment) required by a management plan, report, program or equivalent.
- **NON-COMPLIANT** – given when the auditee has not met a condition, element of a condition, or measure (commitment) required by a management plan, report, program or equivalent. This includes insufficient or no evident records to support a determination.
- **NOT APPLICABLE** – given when a condition, element of a condition, or measure (commitment) required by a management plan, report, program or equivalent falls outside the scope of the audit e.g. if an activity has not yet commenced.
- **OBSERVATION** – when issues relevant to the protection of a matter of national environmental significance are not strictly related to compliance or non-compliance with a condition or element of a condition.



1.5 Audit limitations

The audit, and this audit report, do 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 2020/8773; and
- all and every commitment made in the corresponding action management plans.

The audit and this audit report are based on an evaluation of representative evidence considered adequate to provide a reasonable assessment of compliance with the audit criteria and to inform audit findings. For the absence of doubt, the audit and this audit report:

- 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; and
- has not included an evaluation of Approval Holder compliance with secondary management commitments and management procedures contained within any appendix, attachment or enclosure to an action management plan other than as reasonably necessary to evaluate compliance with overarching conditions of approval and action plan commitments; and
- does not provide an assessment on the appropriateness of any commitments or management controls.

2. Detailed Audit Findings

2.1 Conditions of Approval (EPBC Approval 2020/8773)

Detailed audit findings for applicable conditions of EPBC Approval 2020/8773 (as varied 12 September 2024) are provided in **Table 2.1**.



Table 2.1: Detailed audit findings – Conditions of EPBC Approval 2020/8773

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings						
Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
PART A – CONDITIONS SPECIFIC TO THE ACTION						
1	The approval holder must not clear or undertake any construction activities outside the project area	Review as-disturbed areas against EPBC-approval areas (per EPBC Approval – Attachment A). To include: - review of GIS data (land survey of as-cleared areas and recent aerial imagery) - visual inspection. Review of evidence overlaps with that for Conditions 2, 4 and 19(a).	Audit evidence reviewed and assessed to determine compliance with this condition included: - a review of spatial maps and data showing project disturbance footprint and installed infrastructure in relation to EPBC approval clearing limits - a review of the Approval Holder Incident Management System ('Enablon') and sample of environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024). - site inspection of several disturbance areas to assess implementation of ground-level controls to preserve clearing limits. Spatial records reviewed indicate that clearing areas and limits match the approved project footprint areas per Attachment A to EPBC 2020/8773, with ground disturbance and installed infrastructure confined within these areas. Visual observations during the audit site inspection also confirmed the implementation of ground-level controls to delineate clearing limits including survey markers and flagging tape. Noting that all vegetation clearing had been completed and construction nearing completion as at the time of audit, Auditor is satisfied that the requirements of this Condition 1 have been met.	<u>Spatial Data and Maps</u> [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. [SPATIAL MAP] ADSF Photovoltaic Array Setout (un-dated). Figure showing PV construction configuration relative to EPBC clearing limits [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241101 Area i1 i2, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Areas i1 and i2) relative to development footprints approved under EPBC 2020/8773. [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241101 Area J, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Area J) relative to development footprints approved under EPBC 2020/8773. [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241113 Area K, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Area K) relative to development footprints approved under EPBC 2020/8773. <u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL CLEARING PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10 - Clear, Grub and Slashing of Area A, dated 4-APR-2024. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Representative visual inspection of several cleared areas and in-field delineation of clearing limit boundaries. <u>Acciona Incident Management System</u> [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that all construction activities have occurred within the EPBC-approved project area and development footprints (no construction activities have occurred outside project area). This determination is based on: - review of the spatial/GIS records - review of internal environmental disturbance permits - Auditor site inspection.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
2	<i>[Condition 2 as varied on 12 September 2024]</i> To minimise impacts on protected matters, the approval holder must not clear:	Review as-disturbed areas against EPBC-approval areas (per EPBC Approval – Attachments B through D). To include: - GIS / spatial data - audit site inspection Review of evidence overlaps with that for Conditions 1, 4 and 19(a).	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial maps and data showing project disturbance footprint and installed infrastructure in relation to EPBC approval clearing limits - the Approval Holder Incident Management System ('Enablon') and sample of environmental-related incidents for the 12-month reporting period (13-NOV-2023 to 13-NOV-2024) - site inspection of several disturbance areas to assess implementation of ground-level controls to preserve clearing limits. Spatial records reviewed indicate that habitat clearing limits for Koala, Squatter Pigeon and Greater Glider have been maintained, with all habitat clearance within approved areas. Spatial data shows the following actual vs. approved clearance limits as at the time of audit: - Koala habitat: 269.72 Ha approved, 212 Ha actual - Squatter Pigeon habitat: 259.20 Ha approved, 202 Ha actual - Greater Glider Habitat: 258.77 Ha approved, 202 Ha actual. There were no recorded instances of clearing limit exceedances identified based on a visual review of the Approval Holder's incident management system. Noting that all vegetation clearing had been completed and construction nearing completion as at the time of audit, Auditor is satisfied that the requirements of this Condition 2, and sub-conditions (a) through (c), have been met.	<u>Spatial Data and Maps</u> [SPATIAL MAP] GIS Figure (un-dated) - ADSF Koala Habitat. Figure showing mapped Koala Habitat extent, and reconciliation of habitat area approved for clearing (269.72 Ha) versus total habitat area cleared (212 Ha). [SPATIAL MAP] GIS Figure (un-dated) - ADSF Squatter Pigeon Habitat. Figure showing mapped Koala Habitat extent, and reconciliation of habitat area approved for clearing (259.20 Ha) versus total habitat area cleared (202 Ha). [SPATIAL MAP] Figure (un-dated) - ADSF Greater Glider Habitat. Figure showing mapped Greater Gliding Habitat extent and reconciliation of habitat area approved for clearing (258.77 Ha) versus total habitat area cleared (202 Ha). <u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL CLEARING PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10 - Clear, Grub and Slashing of Area A, dated 4-APR-2024. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Representative visual inspection of several cleared areas and in-field delineation of clearing limit boundaries. <u>Acciona Incident Management System</u> [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that: - No more than 269.72 Ha of Koala habitat has been cleared - No more than 259.20 Ha of Squatter Pigeon habitat has been cleared - No more than 258.77 of Greater Glider habitat has been cleared. This determination is based on: - review of the spatial/GIS records - Auditor site inspection.	COMPLIANT
	a. more than 269.72 ha of Koala habitat	As per above	As per above	As per above	As per above	COMPLIANT
	b. more than 259.20 ha Squatter Pigeon habitat	As per above	As per above	As per above	As per above	COMPLIANT
	c. more than 258.77 ha of Greater Glider habitat	As per above	As per above	As per above	As per above	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
3	[Condition 3 as varied on 12 September 2024] To minimise impacts on <i>Cycas megacarpa</i> the approval holder must:					
	a. conduct pre-clearance surveys to verify there are no more than the four <i>Cycas megacarpa</i> individuals already identified within the project area	Check for/review: pre-clearance survey reports	Audit evidence reviewed and assessed to determine compliance with this condition included: - Pre-clearance survey reports. A review of pre-clearance survey reports was undertaken covering clearing activities for the period December 2023 to May 2024. Further <i>Cycas megacarpa</i> specimens, additional to those identified in the pre-project baseline ecological surveys, were identified within the construction footprint during pre-clearance surveys undertaken in: - January 2024 - March 2024 - May 2024.	<u>Pre-Clearance Survey Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024.	The Auditor is satisfied that: - pre-clearance surveys have been undertaken - further <i>Cycas megacarpa</i> individuals were identified during these pre-clearance surveys, additional to the four (4) individuals identified in baseline ecological surveys. This determination is based on a review of pre-clearance reports for the reporting period.	COMPLIANT
3	b. If more than four <i>Cycas megacarpa</i> individuals are identified within the project area, then the approval holder must not translocate, clear or otherwise impact any <i>Cycas megacarpa</i> individuals without the written approval of the Minister.	Check for/review pre-clearance survey reports. If additional <i>Cycas</i> individuals were identified: - determine if these were translocated, cleared or impacted - check for evidence of prior approval from the Minister.	Audit evidence reviewed and assessed to determine compliance with this condition included: - Threatened Species Impact and Translocation Management Plan (TSITMP) ('<i>Cycas Megacarpa</i> Translocation Plan') - Pre-clearance survey reports - Approval Holder requests to the Minister for approval to disturb >4 <i>Cycas</i> individuals - Minister approval to disturb >4 <i>Cycas</i> individuals. A Threatened Species Impact and Translocation Management Plan (TSITMP) (otherwise titled as the '<i>Cycas Megacarpa</i> Translocation Plan') was also produced (Greentape Solutions, June 2023) to satisfy Condition 3 of EPBC 2020/8773 if more than four (4) <i>Cycas Megacarpa</i> individuals would be translocated, with this 'translocation plan' to be approved by the Minister if Condition 3 was triggered. A request to impact >4 <i>Cycas</i> individuals was submitted by the Approval Holder to the Minister on 11-JUL-2023. This request appears to have been pre-emptive, on the expectation that additional <i>Cycas</i> individuals would likely be discovered and potentially impacted. Further <i>Cycas megacarpa</i> individuals, additional to those identified in the pre-project baseline ecological surveys, were subsequently identified within the construction footprint during pre-clearance surveys undertaken in: - January 2024 - March 2024 - May 2024. While >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no relocations were required as these were either outside the development footprint or avoided through micro-siting.	<u>Pre-Clearance Surveys - Identification of Additional <i>Cycas</i> Individuals</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Evidence of Approval Holder Request to Impact >4 <i>Cycas</i> Individuals</u> [LETTER - PDF] Re: 2020/8773 Aldoga Solar Farm - Expansion Area Cycad clearance. Request for Minister approval to impact up to 20 <i>Cycas megacarpa</i> individuals. Letter from NGH Consulting (Dr Carissa Fee), dated 11-JUL-2023. <u>Evidence of Minister Approval to Impact >4 <i>Cycas</i> Individuals</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 <i>Cycas megacarpa</i>, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that: - further <i>Cycas megacarpa</i> individuals were identified during pre-clearance surveys, additional to the four (4) individuals identified in baseline ecological surveys - approval to disturb these additional individuals was obtained from the Minister. Notwithstanding, no <i>Cycas</i> relocations were required as these were either located outside the development footprint area or avoided through micro-siting. This determination is based on: - a review of pre-clearance reports for the reporting period - record of written approval from the Minister.	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
4	The approval holder must only install solar PV modules and associated infrastructure within the project footprint.	Review as-disturbed areas against EPBC-approval areas (per EPBC Approval – Attachment A). To include: - GIS / spatial data - audit site inspection Review of evidence overlaps with that for Conditions 1, 2 and 19(a).	Audit evidence reviewed and assessed to determine compliance with this condition included spatial maps and data, showing as-constructed solar PV arrays and associated infrastructure. Spatial records reviewed indicate that all solar PV modules and associated infrastructure installed as at the date of the audit has been installed within the approved project area and development footprint areas per Attachment A to EPBC 2020/8773.	<u>Spatial Data and Maps</u> [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241101 Area i1 i2, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Areas i1 and i2) relative to development footprints approved under EPBC 2020/8773. [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241101 Area J, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Area J) relative to development footprints approved under EPBC 2020/8773. [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241113 Area K, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Area K) relative to development footprints approved under EPBC 2020/8773. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Representative visual inspection of several cleared areas and in-field delineation of clearing limit boundaries.	The Auditor is satisfied that all solar PV modules and associated infrastructure has been installed exclusively within the approved project area and footprint. This determination is based on: - review of the spatial/GIS records - Auditor site inspection.	COMPLIANT
5	The approval holder must, prior to commencement of the Action, submit to the Department for the written approval of the Minister an Offset Area Management Plan (OAMP)	Check for/review: - evidence of OAMP development - evidence of OAMP lodgement - evidence of OAMP approval - records indicating date of commencement of the Action Review of evidence overlaps with Conditions 9 and 23.	Audit evidence reviewed and assessed to determine compliance with this condition included: - Approval Holder notification to the Minister regarding commencement of the action - Approval Holder lodgement of the OAMPs - Minister approval of the OAMPs. The OAMPs were lodged to the Minister (via DCCEEW) on 13-DEC-2022. The OAMPs were approved by the Minister on 5-OCT-2023. Commencement of the action occurred on 13-NOV-2023. Submission of the OAMPs occurred before commencement of the action.	<u>Evidence of Action Commencement Notification to the Minister</u> [EMAIL] Aldoga Solar Farm - EPBC 2020/8773 - Action Commenced Notification. Acciona (Meagan Kay) to DCCEEW (epbcmmonitoring@dcceew.gov.au), dated 20-NOV-23, 8:51AM. Notification of 'Commencement of the Action' on 13-NOV-2023. <u>Offset Area Management Plans</u> [PLAN] Offset Area Management Plan – Aldoga South 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). [PLAN] Offset Area Management Plan – Aldoga North 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). <u>Evidence of OAMP Approval</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that: - the Approval Holder prepared the required OAMPs - the OAMPs were submitted to the Minister prior to commencement of the Action. This determination is based on: - review of the OAMPs - records of plan lodgement to and written approval from the Minister.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
6	The OAMP must specify how the approval holder will compensate for impacts of the Action to Koala habitat, Squatter Pigeon habitat and Greater Glider habitat in accordance with the EPBC Act Environmental Offsets Policy to the satisfaction of the Minister	Check for/review: - evidence of OAMP development - evidence of OAMP approval	Audit evidence reviewed and assessed to determine compliance with this condition included: - Offset Area Management Plan – Aldoga South - Offset Area Management Plan – Aldoga North Both OAMPs share a common structure; the approach and mechanism to secure offsets are described as follows in both plans: - Section 1.3 – Offset sites to be sited on separate freehold allotments adjacent the Project and which host equivalent habitat for Koala, Squatter Pigeon and Greater Glider. - Section 1.4 – Offset sites to be secured through a voluntary declaration under the Queensland Vegetation Management Act 1999 (VM Act) within 24 months after the commencement of the Action (as per EPBC 2020/8773, Condition 11(d)). The OAMPs were approved by the Minister on 5-OCT-2023, prior to the date of this audit. For purposes of the enclosed audit, this existing and prior approval of the OAMPs by the Minister is taken to be evidence that the approved OAMPs comply with this Condition 6, including conformance with the EPBC Act Environmental Offsets Policy.	Offset Area Management Plans [PLAN] Offset Area Management Plan – Aldoga South 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). [PLAN] Offset Area Management Plan – Aldoga North 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). Evidence of OAMP Approval [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	Based on evidence reviewed, the Auditor is satisfied that the OAMPs: - specify how the Approval Holder will compensate for impacts of the Action to Koala habitat, Squatter Pigeon habitat and Greater Glider habitat - that this said detail within the OAMPs is in accordance with the EPBC Act Environmental Offsets Policy. This determination is based on: - Auditor assessment of OAMP compliance with this Condition 6 - recognition of existing and prior approval of the OAMPs by the Minister.	COMPLIANT
7	The OAMP must be prepared by a suitably qualified ecologist	Check for/review: - evidence of OAMP development - evidence of OAMP approval - OAMP conformance with Condition 7	Audit evidence reviewed and assessed to determine compliance with this condition included: - Offset Area Management Plan – Aldoga South - Offset Area Management Plan – Aldoga North. - Minister approval of the OAMPs. The OAMPs were lodged to the Minister (via DCCEEW) on 13-DEC-2022 and approved by the Minister on 5-OCT-2023. The approved OAMPs were prepared by: - Dr. Carissa Fee (PhD Ecology NGH Environmental). 14 years' experience at time of plan development - Dr. Jarrah Willis (PhD Restoration/Plant Ecology NGH Environmental). 12 years' experience at time of plan development. Both persons are considered to meet the criteria of 'suitably qualified ecologist' as defined in the definitions attached to EPBC 2020/8773, that is, 'a person who has relevant professional qualifications and at least three years' experience designing and implementing management plans for the protected matters and can give authoritative independent assessment, advice and analysis on the management requirements of the protected matters and their habitat using the relevant protocols, standards, methods and/or literature'. The OAMPs were approved by the Minister on 5-OCT-2023, prior to the date of this audit. For purposes of the enclosed audit, this existing and prior approval of the OAMPs by the Minister is taken to be evidence that the approved OAMPs satisfy the requirements of this Condition 7.	Offset Area Management Plans [PLAN] Offset Area Management Plan – Aldoga South 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). [PLAN] Offset Area Management Plan – Aldoga North 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). Evidence of OAMP Approval [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that the OAMPs were prepared by suitably qualified ecologists. This determination is based on: - Auditor assessment of OAMP compliance with this Condition 7 - recognition of existing and prior approval of the OAMPs by the Minister.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
8	To ensure that the offsets required for Koala habitat, Squatter Pigeon 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 must be achieved within 20 years of the commencement of the Action and then be maintained or improved for the duration of the approval	Not applicable	Not applicable (not triggered). Condition 8 relates to a future milestone not yet triggered as at the date of this audit.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
9	The approval holder must not commence the Action until the OAMP has been approved in writing by the Minister	Check for/review: - evidence of OAMP approval - records indicating date of commencement of the Action Review of evidence overlaps with that for Condition 5 and Condition 23.	Audit evidence reviewed and assessed to determine compliance with this condition included: - Approval Holder notification to the Minister regarding commencement of the action - Approval Holder lodgement of the OAMPs - Minister approval of the OAMPs. OAMPs were lodged to the Minister (via DCCEEW) on 13-DEC-2022. OAMPs were approved by the Minister on 5-OCT-2023. Commencement of the action occurred on 13-NOV-2023. Written approval of the OAMPs from the Minister was received prior to the commencement of the action.	<u>Evidence of Action Commencement Notification to the Minister</u> [EMAIL] Aldoga Solar Farm - EPBC 2020/8773 - Action Commenced Notification. Acciona (Meagan Kay) to DCCEEW (epbcmonitoring@dcceew.gov.au), dated 20-NOV-23, 8:51AM. Notification of 'Commencement of the Action' on 13-NOV-23. <u>Evidence of OAMP Approval</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that: - the Approval Holder prepared the required OAMPs - the OAMPs were approved in writing by the Minister prior to commencement of the action. This determination is based on: - review of the OAMPs - records of plan lodgement to and written approval from the Minister.	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
10	The approval holder must implement the OAMP approved by the Minister prior to the commencement of the Action and for the remainder of the approval	Check for/review: - evidence of OAMP development - evidence of OAMP approval Check for evidence of plan implementation, e.g.: - implementation of applicable time-bound management actions as per Condition 12 - plan requirements have been communicated - offset sites have been secured, or are being secured - record of weed and feral control activities - record of offset area environmental monitoring (if applicable) - visual inspection - other	Audit evidence reviewed and assessed to determine compliance with this condition included: - Approval Holder notification to the Minister regarding commencement of the action - Minister approval of the OAMPs. - OAMPs. - Offset Area Operational Plans (OAOPs) (draft-in-development, unpublished). Section 4.6 of the OAMPs states that offset sites will be legally secured within 24 months of the OAMP approval through voluntary declarations made under Section 19E and 19F of the Queensland <i>Vegetation Management Act 1999</i>. The OAMPs were approved by the Minister on 5-OCT-2023, thus the offset sites must be secured by 5-OCT-2025. Per Section 4.3 of the OAMPs, the subsidiary Offset Area Operational Plans (OAOPs) will detail the key on-ground management actions to be implemented within the offset sites, once secured, to protect maintain ecological values. These OAOPs will be developed for each offset site within 12 months of legal security of the offset land. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites identified in the OAMPs, and thus the OAOPs are still in development and are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered). The Auditor reviewed an example, draft-in-development (unpublished) OAOP, which for purposes of this Condition 10, is considered evidence that management of offset sites has commenced in preparation for legal securing.	<u>Evidence of Action Commencement Notification to the Minister</u> [EMAIL] Aldoga Solar Farm - EPBC 2020/8773 - Action Commenced Notification. Acciona (Meagan Kay) to DCCEEW (epbcmonitoring@dcceew.gov.au), dated 20-NOV-23, 8:51AM. Notification of 'Commencement of the Action' on 13-NOV-23. <u>Evidence of OAMP Approval</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023. <u>Evidence of Development of Offset Area Operational Plans (OAOPs)</u> [DRAFT PLAN] Aldoga Solar Project OAOP Rev A - DRAFT PLAN (draft-in-development, unpublished). Attexo Group Pty Ltd. Prepared for Acciona Energy Australia Global Pty Ltd. Draft Rev A, dated 21-AUG-2024.	The Auditor is satisfied that the Approval Holder implemented the OAMP prior to the commencement of Action. This determination is based on evidence of OAOP development (draft documents, unpublished) in preparation for legal securing of the nominated offset sites.	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
11	The OAMP must include: a. a summary of the residual impacts of the Action on Koala habitat, Squatter Pigeon habitat and Greater Glider habitat (including impacts on habitat quality) which will be offset. This summary must include the area of habitat, condition and habitat quality of Koala habitat, Squatter Pigeon habitat and Greater Glider habitat at all impact sites which each particular offset site/s is to address	Check for/review: - evidence of OAMP development - evidence of OAMP approval	Audit evidence reviewed and assessed to determine compliance with Condition 11, and sub-conditions (a) through (i), included: - Offset Area Management Plan – Aldoga South - Offset Area Management Plan – Aldoga North - Minister approval of the OAMPs. The OAMPs were approved by the Minister on 5-OCT-2023, prior to the date of this audit. For purposes of the enclosed audit, this existing and prior approval of the OAMPs by the Minister is taken to be evidence that the approved OAMPs satisfy the requirements of Condition 11. It is noted that the two OAMPs share a common structure, with identical headings, sub-headings and table and figure numbering, which is reflected in the Auditor comments against this Condition 11. Information summarising residual impacts on Kaola, Squatter Pigeon and Greater Glider Habitat (and habitat quality) to be offset are described in: - Section 2.1 (Impact Site Values) – Information on habitat impacted, its quality and the offset area required as relevant to each species. - Section 3 (Offset Site Values, supported by Appendices) – Description of offset site values including bioregional context, offset area values and offset area calculations for Koala, Greater Glider and Squatter Pigeon.	Offset Area Management Plans [PLAN] Offset Area Management Plan – Aldoga South 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). [PLAN] Offset Area Management Plan – Aldoga North 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). Evidence of OAMP Approval [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEE (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that the OAMPs satisfy the requirements of this Condition 11. This determination is based on: - Auditor assessment of OAMP compliance with each sub-condition (a through i) - recognition of existing and prior approval of the OAMPs by the Minister.	COMPLIANT
	b. a description of the proposed offset site/s, including location, size, condition, current habitat quality of habitat of the relevant protected matters, environmental values present and surrounding land uses	As per above	Information on the location, quality and values of the proposed offset sites are provided as follows in both plans: - Section 1.3 – Offset sites to be sited on separate freehold allotments adjacent the Project and which host equivalent habitat for Koala, Squatter Pigeon and Greater Glider. - Section 1.4 – Offset sites to be secured through a voluntary declaration under the <i>Queensland Vegetation Management Act 1999</i> within 24 months after the commencement of the Action (as per EPBC 2020/8773, Condition 11(d)). - Section 3 (Offset Site Values, supported by Appendices) – Description of offset site values including bioregional context, offset area values and offset area calculations for Koala, Greater Glider and Squatter Pigeon.	As per above	As per above	COMPLIANT
	c. a table of commitments made in the OAMP to achieve the ecological benefits for Koala habitat, Squatter Pigeon habitat and Greater Glider habitat, and a reference to where these commitments are detailed in the OAMP	As per above	A table of commitments regarding achievement of ecological benefits for Koala habitat, Squatter Pigeon habitat and Greater Glider habitat are provided as follows in both plans: Section 1.5.1 (Commitments of the OAMP) and Table 1-3 (Acciona commitments to achieve the environmental outcomes of this OAMP).	As per above	As per above	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
d. the mechanism by which and the timing by when (being no later than 24 months after the commencement of the Action) the offset site/s will be secured in perpetuity	As per above	Information on the mechanism and timing to secure offsets are provided as follows in both plans: Section 1.4 – Offset sites to be secured through a voluntary declaration under the <i>Queensland Vegetation Management Act 1999</i> within 24 months after the commencement of the Action. Noting commencement of the action occurred on 13-NOV-2023, the Approval Holder has until 13-NOV-2025 to secure the offset areas described in the OAMPs.	As per above	As per above	COMPLIANT
e. the approval holder must notify the department within 5 business days of the mechanism to secure the offset site/s having been executed, and provide documentary evidence to demonstrate the securement of the offset site/s	As per above	Information on the mechanism and timing to secure offsets are provided as follows in both plans: Section 1.4 – Offset sites to be secured through a voluntary declaration under the <i>Queensland Vegetation Management Act 1999</i> within 24 months after the commencement of the Action. Noting commencement of the action occurred on 13-NOV-2023, the Approval Holder has until 13-NOV-2025 to secure the offset areas described in the OAMPs. As at the time of audit, Condition 11(e) has not yet been triggered.	As per above	Not applicable (not triggered)	NOT APPLICABLE
f. baseline data of the offset site/s, including results from field validated surveys, and quantifiable ecological data on habitat quality for Koala habitat, Greater Glider habitat and Squatter Pigeon habitat and other supporting evidence that documents the presence of Squatter Pigeon and potential presence of Koala and Greater Glider	As per above	Baseline data and survey results are provided as follows in both plans: Appendix B (Modified Queensland Habitat Quality assessment for the offset sites).	As per above	The Auditor is satisfied that the OAMPs satisfy the requirements of this Condition 11. This determination is based on: - Auditor assessment of OAMP compliance with each sub-condition (a through i) - recognition of existing and prior approval of the OAMPs by the Minister.	COMPLIANT
g. details of how the offset/s will provide connectivity with other habitats, populations and biodiversity corridors and/or will contribute to a larger strategic offset for Koala, Squatter Pigeon and Greater Glider	As per above	The mechanism to secure offsets is described as follows in both plans: Section 3 (Offset Site Values, supported by Appendices) – Description of offset site values including bioregional context, offset area values and offset area calculations for Koala, Greater Glider and Squatter Pigeon.	As per above	As per above	COMPLIANT
h. maps and shapefiles to clearly define the location and boundaries of the offset site/s, accompanied by offset attributes	As per above	Plan content satisfying Condition 11(h) is provided as follows in both plans: - Spatial figures (Figures 1-1, 1-2, 3-1 and 4-1) - Appendices (supporting data on offset site attributes).	As per above	As per above	COMPLIANT
i. specific offset completion criteria derived from the site habitat quality to demonstrate the improvement in the quality of Koala habitat, Squatter Pigeon habitat and Greater Glider habitat within the environmental offset sites over the period of life of this approval required to meet the requirements of the EPBC Act Environmental Offsets Policy	As per above	Offset completion criteria are provided as follows in both plans: - Section 7.3.2 (completion criteria) - Table 7-4 (completion criteria and interim targets for habitat quality scores).	As per above	As per above	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
12	The OAMP must contain details of the management Actions, and timeframes for implementation, to be undertaken to achieve the offset completion criteria specified in the OAMP including but not limited to: a. weed and feral animal control	Check for/review: - evidence of OAMP development - evidence of OAMP approval - OAMP conformance with Condition 12	Audit evidence reviewed and assessed to determine compliance with Condition 12, and sub-conditions (a) through (e), included: - Offset Area Management Plan – Aldoga South - Offset Area Management Plan – Aldoga North - Minister approval of the OAMPs. The OAMPs were approved by the Minister on 5-OCT-2023, prior to the date of this audit. For purposes of the enclosed audit, this existing and prior approval of the OAMPs by the Minister is taken to be evidence that the approved OAMPs satisfy the requirements of Condition 12. It is noted that the two OAMPs share a common structure, with identical headings, sub-headings and table and figure numbering, which is reflected in the Auditor comments against this Condition 12. Proposed management actions for weed and feral control are provided as follows in both plans: - Section 4.3 (Offset Area Operation Plan) – commitment to develop Offset Area Operation Plans (OAOPs) which will provide detailed on-ground management actions, including pest species control. - Section 4.4 (Management Action 1, Weed management) – overview key weed species and on-ground management methods to be implemented through the OAOPs. Per Section 4.3 of the OAMPs, the OAOPs will be developed for each offset site within 12 months of legal security of the offset site land. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites and the OAOPs are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered). Notwithstanding that the subsidiary OAOPs are not yet developed or in place, the auditor is satisfied that OAMPs adequately commit to future monitoring consistent with the requirement of this Condition 12(a).	Offset Area Management Plans [PLAN] Offset Area Management Plan – Aldoga South 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). [PLAN] Offset Area Management Plan – Aldoga North 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). Evidence of OAMP Approval [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that the OAMPs satisfy the requirements of this Condition 12. This determination is based on: - Auditor assessment of OAMP compliance with each sub-condition (a through e) - Recognition of existing and prior approval of the OAMPs by the Minister.	COMPLIANT
	b. interim milestones that set targets at 5-yearly intervals for progress towards achieving the offset completion criteria	As per above	5-yearly interim milestones to measure progress toward completion criteria are provided as follows in both plans: Section 7.3.2 (Table 7-3). The OAMPs were approved by the Minister on 5-OCT-2023, prior to the date of this audit. For purposes of the enclosed audit, this existing and prior approval of the OAMPs by the Minister is taken to be evidence that the approved OAMPs comply with this Condition 12(b).	As per above	As per above	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
c. the nature, timing and frequency of monitoring to inform progress against achieving the 5-yearly interim milestones (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 time to implement any necessary corrective Actions): (i) timing for the submission of monitoring reports which provide evidence demonstrating whether the interim milestones and offset completion criteria are likely to be, and/or have been, achieved, including a firm commitment to notify the department in writing 1 year in advance of the end of the approval if the completion criteria will not be achieved within 20 years of the commencement of the Action; and (ii) timing for the implementation of corrective Actions if monitoring activities indicate the interim milestones will not be, or have not been, achieved	As per above	Information satisfying Condition 12(c) is provided as follows in both plans: - Section 7.1 (Monitoring) and Table 7-1 (Management actions, monitoring and performance criteria) - Section 7.2 (Reporting) and Table 7-2 (Reporting timeframes) - Section 7.33 (Corrective Actions) and Table 7-8 (Management triggers and corrective actions). Table 7-1 notes that detailed monitoring requirements and methods will be provided in Offset Area Operation Plans (OAOPs). Per Section 4.3 of the OAMPs, these OAOPs will be developed for each offset site within 12 months of legal security of the offset site land. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites and the OAOPs are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered). The Auditor is satisfied that OAMPs address and commit to future monitoring, reporting and corrective actions consistent with the requirement of this Condition 12(c). This has considered the subsidiary OAOPs, which are in currently in development (un-published) at the time of audit.	As per above	As per above	COMPLIANT
d. a risk analysis and a risk assessment and mitigation strategy for all risks to the successful implementation of the OAMP and timely achievement of the offset completion criteria, including a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix	As per above	Risk assessment and mitigation information is provided as follows in both plans: Section 6 (risk assessment) and Table 6-1 (risk ratings and mitigation strategies).	As per above	As per above	COMPLIANT
e. evidence of how the management Actions and corrective Actions take into account relevant approved conservation advice and are consistent with any relevant recovery plans and threat abatement plans	As per above	Information on how management actions align with conservation advice is provided as follows in both plans: Section 4.1 (Offset area - Management Objectives) and Table 4-1 (Recovery actions for Koala, Greater Glider and Squatter Pigeon and how the offset management will promote these actions).	As per above	As per above	COMPLIANT
13 To ensure that the offsets required for Koala habitat, Squatter Pigeon 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:					
a. must be achieved within 20 years of the commencement of the Action	Not applicable	Not applicable (not triggered). Condition 13 relates to a future milestone not yet triggered as at the date of this audit.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
b. once achieved, must be maintained or improved for the remaining duration of the approval	Not applicable	As per above	Not applicable	Not applicable (not triggered)	NOT APPLICABLE

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
14	The approval holder must, within 20 business days of the 20th anniversary of the commencement of the Action:					
	a. submit to the department a report detailing the area and condition of Koala habitat, Squatter Pigeon habitat and Greater Glider habitat in all offset area(s) specified in the approved OAMP	Not applicable	Not applicable (not triggered). Condition 14 relates to a future milestone not yet triggered as at the date of this audit.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
	b. 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	Not applicable	As per above	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
15	To avoid, mitigate and manage impacts of the Action on EPBC Act listed threatened species and their habitat, the approval holder must submit a MNES Management Plan to the department for the Minister's approval prior to the commencement of the Action	Check for/review: - MNES Management Plan - evidence of plan approval - records indicating date of commencement of the Action Review of evidence overlaps with that for Condition 17 and Condition 23.	Audit evidence reviewed and assessed to determine compliance with this condition included: - Approval Holder notification to the Minister regarding commencement of the action - Approval Holder lodgement of the MNES Management Plan - Minister approval of MNES Management Plan. The MNES Management Plan was lodged to the Minister (via DCCEEW) on 27-APR-2023. The MNES Management Plan was approved by the Minister on 5-OCT-2023. Commencement of the action occurred on 13-NOV-2023. Submission of the MNES Management Plan to the Minister occurred prior to commencement of the action.	<u>Evidence of Action Commencement Notification to the Minister</u> [EMAIL] Aldoga Solar Farm - EPBC 2020/8773 - Action Commenced Notification. Acciona (Meagan Kay) to DCCEEW (epbcmonitoring@dcceew.gov.au), dated 20-NOV-23, 8:51AM. Notification of 'Commencement of the Action' on 13-NOV-2023. <u>Evidence of MNES Management Plan Approval</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that: - the Approval Holder prepared the required MNES Management Plan - the MNES Management Plan was submitted to and approved by the Minister prior to the commencement of the Action. - This determination is based on: - record of plan lodgement - record of written plan approval.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
16	The MNES Management Plan must be prepared by a suitably qualified ecologist and in accordance with the department's Environmental Management Plan Guidelines	Check for/review: - MNES Management Plan - evidence of plan approval - plan conformance with Condition 16 - plan conformance with DCCEEW EMP Guidelines.	Audit evidence reviewed and assessed to determine compliance with this condition included: - MNES Management Plan - Minister approval of MNES Management Plan. The MNES Management Plan (V2.3, dated 1-AUG-2023) was lodged to the Minister (via DCCEEW) on 27-APR-2023 and approved by the Minister on 5-OCT-2023. The approved MNES Management Plan was prepared by: - Beth Kramer (BSc, M. Env. Mgt; Member EIANZ Principal Ecologist/Director - NGH Environmental). 13-years' experience at time of plan development. - Jo Davis (BSc Hons; Senior Ecologist Senior Ecologist - NGH Environmental). 12-years' experience at time of plan development. The Auditor is satisfied that both persons meet the criteria for a 'suitably qualified ecologist' as defined in the definitions attached to EPBC 2020/8773, that is, 'a person who has relevant professional qualifications and at least three years' experience designing and implementing management plans for the protected matters and can give authoritative independent assessment, advice and analysis on the management requirements of the protected matters and their habitat using the relevant protocols, standards, methods and/or literature'. The Auditor has reviewed MNES Management Plan against the requirements of the DCCEEW Environmental Management Plan Guidelines (Version 1.2, 2024) ('the EMP Guidelines') and is satisfied that the plan structure and content is in general accordance with the EMP Guidelines. Examples of plan alignment with the EMP Guidelines include: - risk assessment framework - conditions of approval reference table format - headings and sub-headings (though in custom order within plan).	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023). <u>Evidence of MNES Management Plan Approval</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that the MNES Management Plan: - was prepared by suitably qualified ecologists - has been prepared in accordance with the DCCEEW Environmental Management Plan Guidelines. This determination is based on: - Auditor assessment of MNES Management Plan compliance with this Condition 16 - recognition of existing and prior approval of the MNES Management Plan by the Minister.	COMPLIANT
17	The approval holder must not commence the Action until the Minister has approved the MNES Management Plan in writing	Check for/review: - evidence of plan approval - records indicating date of commencement of the Action Review of evidence overlaps with that for Condition 15 and Condition 23.	Audit evidence reviewed and assessed to determine compliance with this condition included: - Approval Holder notification to the Minister regarding commencement of the action - Approval Holder lodgement of the MNES Management Plan - Minister approval of the MNES Management Plan. The MNES Management Plan was lodged to the Minister (via DCCEEW) on 27-APR-2023 and approved by the Minister on 5-OCT-2023. Commencement of the action occurred on 13-NOV-2023. Written approval of the MNES Management Plan by the Minister was received prior to the commencement of the action.	<u>Evidence of Action Commencement Notification to the Minister</u> [EMAIL] Aldoga Solar Farm - EPBC 2020/8773 - Action Commenced Notification. Acciona (Meagan Kay) to DCCEEW (epbcmmonitoring@dcceew.gov.au), dated 20-NOV-23, 8:51AM. Notification of 'Commencement of the Action' on 13-NOV-2023. <u>Evidence of MNES Management Plan Approval</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that: - the Approval Holder prepared the required MNES Management Plan - the MNES Management Plan was approved in writing by the Minister prior to commencement of the Action. This determination is based on written records of: - plan lodgement - Minister approval of plan - Approval Holder notification of commencement of the Action.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
18	The approval holder must commence implementing the approved MNES Management Plan and continue to implement it for the duration of the approval	Check for/review: - evidence of plan approval - records indicating date of commencement of the Action Check for evidence of plan implementation, including but not necessarily limited to: - plan requirements have been communicated - records of pre-clearance surveys - records of environmental monitoring, including use of fauna spotter/catchers - clearing limits - use of fencing and fencing type - vegetation clearing planning and procedures - other	The following representative evidence was reviewed as evidence of implementation of the approved MNES Management Plan, noting that the evidence reviewed, and the Auditor's assessment has significant overlap with that for Conditions 1-4 and 19-21. Representative evidence reviewed: - evidence of adherence to approved clearing limits (per Conditions 1-4) - pre-clearance survey records/reports (per Condition 20) - fauna spotting records/reports (per Condition 20) - installation of glider poles and cameras (per Condition 20) - installation of barbed-wire fencing mitigation measures (per Condition 20) - ecological monitoring records and reports (per Condition 21) - other (e.g. MNES requirements training and communication records) Based on the representative evidence reviewed, and noting the overlap with Conditions 1-4 and 19-21, the Auditor is satisfied that the MNES Management Plan was implemented during the reporting period.	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023). <u>Evidence of Pre-Clearance Surveys</u> [PDF REPORT] Memo - Aldoga Solar Farm BESS Geotech Pre-Clearance Survey Results, Feb 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 9-FEB-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Evidence of Ecological Monitoring (inc. Fauna Spotting)</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024. Fauna Spotters Australia. Report prepared for Acciona, undated report. <u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive conditions on clearing, weed management, clearing limits and other controls. [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. <u>Aldoga Solar Farm Induction and Induction Records</u> [POWERPOINT FILE - PDF] Aldoga Solar Farm Site-Specific Induction (un-dated file). Sample of completed induction training records also reviewed (evidence of induction delivery). Induction includes EPBC, MNES and general environmental requirements on Slides 30-40 inclusive.	The Auditor is satisfied that the Approval Holder implemented the approved MNES Management Plan during the reporting period. This determination is based on a review of representative evidence, including: - pre-clearance survey reports - records of vegetation clearing planning and control - fauna spotter reports - MNES requirements training records. This determination is made in conjunction with the Auditor's assessment of overlapping conditions.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
19	The environmental outcomes that must be achieved by implementing the MNES Management Plan are:					
a.	to ensure that impacts to protected matters do not exceed the clearance limits specified in Condition 1 and 2	Review as-disturbed areas against EPBC-approval areas (per EPBC Approval – Attachment A). Review of evidence overlaps with that for Conditions 1 and 2.	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial maps and data showing project disturbance footprint and installed infrastructure in relation to EPBC approval clearing limits - the Approval Holder Incident Management System ('Enablon') and sample of environmental-related incidents for the 12-month reporting period (13-NOV-2023 to 13-NOV-2024) - site inspection of several disturbance areas to assess implementation of ground-level controls to preserve clearing limits. Spatial records reviewed indicate the following: - clearing areas and limits match the approved project footprint areas per Attachment A to EPBC 2020/8773, with ground disturbance and installed infrastructure confined within these areas. Visual observations during the audit site inspection also confirmed the implementation of ground-level controls to delineate clearing limits including survey markers and flagging tape. - habitat clearing limits for Koala, Squatter Pigeon and Greater Glider have been maintained, with all habitat clearance within approved areas. Spatial data shows the following actual vs. approved clearance limits as at the time of audit: - Koala habitat: 269.72 Ha approved, 212 Ha actual - Squatter Pigeon habitat: 259.20 Ha approved, 202 Ha actual - Greater Glider Habitat: 258.77 Ha approved, 202 Ha actual. There were no recorded instances of clearing limit exceedances identified based on a visual review of the Approval Holder's incident management system. Noting that vegetation clearing and construction has been substantially completed as at the time of audit, the Auditor is satisfied that the requirements of this Condition 19(a) have been met.	Spatial Data and Maps [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. [SPATIAL MAP] ADSF Photovoltaic Array Setout (un-dated). Figure showing PV construction configuration relative to EPBC clearing limits [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241101 Area i1 i2, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Areas i1 and i2) relative to development footprints approved under EPBC 2020/8773. [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241101 Area J, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Area J) relative to development footprints approved under EPBC 2020/8773. [SPATIAL MAP] GIS Figure (Propeller): ACA QLD AUST - ALDOGA SOLAR - 241113 Area K, dated 15-DEC-2024. Figure showing completed and in-progress solar PV array and associated infrastructure installation (Area K) relative to development footprints approved under EPBC 2020/8773. [SPATIAL MAP] GIS Figure (un-dated) - ADSF Koala Habitat. Figure showing mapped Koala Habitat extent, and reconciliation of habitat area approved for clearing (269.72 Ha) versus total habitat area cleared (212 Ha). [SPATIAL MAP] GIS Figure (un-dated) - ADSF Squatter Pigeon Habitat. Figure showing mapped Koala Habitat extent, and reconciliation of habitat area approved for clearing (259.20 Ha) versus total habitat area cleared (202 Ha). [SPATIAL MAP] Figure (un-dated) - ADSF Greater Glider Habitat. Figure showing mapped Greater Gliding Habitat extent and reconciliation of habitat area approved for clearing (258.77 Ha) versus total habitat area cleared (202 Ha).	The Auditor is satisfied that: - all construction activities undertaken during the reporting period occurred within the EPBC-approved project area and development footprints (no construction activities occurred outside project area). - No more than 269.72 Ha of Koala habitat has been cleared - No more than 259.20 Ha of Squatter Pigeon habitat has been cleared - No more than 258.77 of Greater Glider habitat has been cleared. This determination is based on review of the spatial/GIS records.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
b. to ensure that no Koala or Greater Glider or Squatter Pigeon individuals are injured or killed as a result of the Action	Check for/review: - fauna spotter reports - incident records To include: - approval holder internal incident records - statutory incident notification records (if applicable)	Audit evidence reviewed and assessed to determine compliance with this condition included: - fauna spotter reports - the Approval Holder Incident Management System ('Enablon') and sample of environmental-related incidents for the 12-month reporting period (13-NOV-2023 to 13-NOV-2024) Based on the evidence reviewed there were no recorded instances of injury or death of any Koala, Greater Glider or Squatter Pigeon individuals associated with Project construction activities during the reporting period. Accordingly, there were no statutory incident notification records made to the Department (DCCEEW) during the reporting period in relation to this Condition 19(b).	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023). <u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona. <u>Acciona Incident Management System</u> [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that there were no recorded injuries or deaths of Koala, Greater Glider or Squatter Pigeon individuals during the reporting period as a result of the Action. This determination is based on a review of: - fauna spotter reports - Approval Holder incident records.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
c. to ensure no net loss of <i>Cycas megacarpa</i> individuals as a result of the Action	Check for/review: - pre-clearance survey reports - Cycas translocation records	Audit evidence reviewed and assessed to determine compliance with this condition included: - pre-clearance survey reports - Cycad translocation records and reports - Cycad translocation database and monitoring records. A review of pre-clearance survey reports was undertaken covering clearing activities for the period December 2023 to May 2024. Further <i>Cycas megacarpa</i> individuals, additional to those identified in the pre-project baseline ecological surveys, were identified within the construction footprint during pre-clearance surveys undertaken in: - January 2024 - March 2024 - May 2024 Evidence reviewed indicates that although >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting. Based on collective evidence, the Auditor is satisfied that no net loss of <i>Cycas megacarpa</i> individuals has occurred as at the date of audit.	<u>Pre-Clearance Surveys - Identification of Additional Cycas Individuals</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024.	The Auditor is satisfied that no net loss of <i>Cycas megacarpa</i> individuals has occurred as a result of the Action. This determination is based on a review of pre-clearance survey reports.	COMPLIANT
d. to ensure there is no clearance in riparian zones; and	Check for/review: - vegetation clearing records - GIS mapping/data - audit site inspection (observation of clearing areas)	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial maps and data showing project disturbance footprint and installed infrastructure in relation to EPBC approval clearing limits - the Approval Holder Incident Management System ('Enablon') and sample of environmental-related incidents for the 12-month reporting period (13-NOV-2023 to 13-NOV-2024) - audit site inspection of several disturbance areas to assess implementation of ground-level controls to preserve clearing limits. Spatial records reviewed indicate that clearing areas and limits match the approved project footprint areas per Attachment A to EPBC 2020/8773, with no clearing of riparian zones other than watercourse crossings as part of access road widening or upgrade.	<u>Spatial Data and Maps</u> [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. [SPATIAL MAP] ADSF Photovoltaic Array Setout (undated). Figure showing PV construction configuration relative to EPBC clearing limits	The Auditor is satisfied that there was no clearing of vegetation in riparian zones during the reporting period, other than associated with watercourse crossings as part of access road widening and/or upgrade. This determination is based on: - based on review of the spatial/GIS records - audit site inspection.	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
e. to maintain wildlife corridors, habitat quality and habitat connectedness within the project area and Mount Larcom by maintaining the habitat quality of the proposed functional wildlife corridor within the project area connecting Larcom Creek and Mount Larcom	Check for/review: - Spatial maps (project design layouts) - land title records showing corridor establishment - monitoring records - land management records	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial maps and data showing wildlife corridor alignment - land tenure records (lease plan) indicating wildlife corridor establishment - wildlife corridor inspection records - wildlife corridor land management records Spatial maps reviewed indicate that the wildlife corridor between Larcom Creek and Mount Larcom has been established and is allowed for within and avoided by the project development layout. Further, the corridor has been delineated at ground level to mitigate the risk of uncontrolled disturbance. Evidence of wildlife corridor monitoring (e.g. weed presence and abundance) was observed in the form of internal inspection records and the project site weed register. Evidence of wildlife corridor management was observed of an internal memorandum summarising the results of mechanical weed removal trial undertaken within the wildlife corridor. Based on the evidence reviewed the Auditor is satisfied that the functional wildlife corridor between Larcom Creek and Mount Larcom has been established and was monitored and maintained during the reporting period.	<u>Evidence of Wildlife Corridor Establishment</u> [SPATIAL MAP] DSF_EDQ_002_01 - Dev_Area_LeasePlan_RevJ.PDF. Development Area Lease Plan - Alodga Solar Farm. GIS Figure dated 27-AUG-2024. Prepared by Acciona Energia. Figure showing Development Lease Area, inclusive wildlife corridor. [SPATIAL MAP] Functional Wildlife Corridor - Aldoga Solar Farm. GIS Figure dated 4-DEC-2024, 5:19:11PM. Figure showing alignment of wildlife corridor connecting Larcom Creek and Mount Larcom. [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. <u>Evidence of Wildlife Corridor Monitoring</u> [PDF DOCUMENT] Memorandum – Addition to Minor Works Proposal: Functional Wildlife Corridor Work (dated 3-OCT-2024). Record of mechanical weed removal trial within the wildlife corridor. [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Proforma checklist covering general aspects of soil, water, air quality, waste management, fauna risk/harm, fire management and ground rehabilitation. Sample of completed checklists reviewed: - Inspection ID INS.0000045693 (3-OCT-2024): Drone Compliance Checks. Evidence of inspection of weed presence in wildlife corridor. - Inspection ID INS.0000045333 (26-NOV-2024): Area J Clear and Grub Inspection. Evidence of inspection of weed presence in wildlife corridor. [REGISTER] ADSF - Flora and Fauna Register - Pest Extract. Weed Register (un-dated PDF document). <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of retained wildlife corridor between Larcom Creek and Mount Larcom.	The Auditor is satisfied that the functional wildlife corridor between Larcom Creek and Mount Larcom has been established and was monitored and maintained during the reporting period. This determination is based on: - review of spatial/GIS records - review of inspection and land management records - audit site inspection.	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
20	The MNES Management Plan must:					
	a. commit to undertake pre-clearance surveys to identify any protected matters within the vicinity of the clearing within the project area to inform predicted impacts	Check for/review: MNES Management Plan NOTE – for purposes of the enclosed audit, it is noted that the existing and prior approval of the MNES Management Plan by the Minister is taken to be evidence that the approved MNES Management Plan satisfies this Condition 20.	Information on the timing and method of pre-clearance surveys is provided in: Section 5.6.2 (pre-clearance surveys)	<u>MNES Management Plan</u> [PLAN] MNES Management Plan – Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(a) This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
	b. detail the predicted impacts to protected matters and their habitat from the clearing, construction, operation and decommissioning, phases of the Action	As per above	Information on the predicted impacts to protected matters and their habitat is provided in: Section 5.1 (Clearing limits). Information on the approved clearing limits (direct impacts) for Koala, Greater Glider, Squatter Pigeon and Cycas megacarpa individuals. Noting that the approved clearing limits fundamentally relate to direct impact only, the Auditor notes that indirect impacts are also addressed at length within the MNES Management Plan (e.g. noise, dust, lighting, weeds, pest animals, loss of habitat connectivity), however their relevance to Condition 20(b) is not explicit within the plan or the Conditions of Approval Reference Table (Table 2-1). Predicted impacts should reasonably include both direct and indirect impacts on the protected matters. This follows the Matters of National Environmental Significance – Significant impact guidelines 1.1 (DoE, 2013) which defines adverse impacts as all impacts that ' <i>could reasonably be predicted to follow from the action</i> ', and states that ' <i>indirect impacts will be relevant where they are sufficiently close to the proposed action to be said to be a consequence of the action, and they can reasonably be imputed to be within the contemplation of the person proposing to take the action</i> '.	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(b). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister. <u>Observation</u> Predicted impacts to the protected matters and their habitat should reasonably include both direct impacts (clearing) and indirect impacts. The MNES Management Plan does address indirect impacts, though these aren't explicitly identified as 'predicted impacts' in the context of Condition 20(b).	COMPLIANT

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
c. detail the measures that will be undertaken in the project area to avoid, mitigate and limit impacts on protected matters and their habitat during clearing, construction, operation and decommissioning;	Check for/review: MNES Management Plan	Management measures to avoid, mitigate and limits impacts on protected matters are provided in: - Section 5 (Management actions and risk assessment). This section of the MNES Management Plan is extensive in detail covering specific management measures to be adopted, methodology and timing of said actions - for example: - adherence to approved clearing limits - access road vehicle speed limits - infrastructure micro-siting - weed and pest animal control - clearing boundary survey and in-field delineation - pre-clearing ecological surveys and use of fauna spotters during clearing - staged clearing and habitat salvage <i>Cycas megacarpa</i> translocation. The Auditor considers that the MNES Management Plan is sufficiently detailed with regard to mitigation measures in accordance with this Condition 20(c).	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(c). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
d. detail the specific timing of implementation, frequency and duration of the measures to be implemented	As per above	Information on the timing, implementation, frequency and duration of management measures to be implemented are provided in: - Section 5 (Management actions and risk assessment) - Section 6 (Monitoring and reporting) and Table 6-1 (Monitoring schedule)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(d). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
e. provide evidence of how the measures are based on best available practices, appropriate standards, and supported by scientific evidence	As per above	Information on the alignment of management measures to best-practices, standards and other scientific evidence are provided in: Appendix E (MNES profiles). Impact and management approaches presented in threatened fauna species profile for Koala, Greater Glider, Squatter Pigeon and <i>Cycas megacarpa</i>. The species-specific management approaches presented in these MNES profiles (Appendix E) are consistent with the management measures detailed in the main plan document.	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(e). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
f. detail how the measures have been developed with consideration of the S.M.A.R.T principle	As per above	Information on the alignment of management measures with S.M.A.R.T principles is provided in: Section 5.2 (S.M.A.R.T principles)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(f). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
g. 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	Check for/review: MNES Management Plan	Risk assessment and mitigation information is provided in: Section 5.9 (risk assessment) and Table 5-3 (risk assessment) The Auditor notes that the risk assessment framework applied within the MNES Management Plan (e.g. risk matrix, likelihood and consequence definitions) is consistent with the DCCEEW Independent Audit and Audit Report Guidelines (2019).	MNES Management Plan [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(g). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
h. 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 plan	As per above	Information on the alignment of management measures to best-practices, standards and other scientific evidence are provided in: Appendix E (MNES profiles). Impact and management approaches presented in threatened fauna species profile for Koala, Greater Glider, Squatter Pigeon and Cycas megacarpa. The species-specific management approaches presented in these MNES profiles (Appendix E) are consistent with the management measures detailed in the main plan document.	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(h). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
i. include links to relevant management plans or conditions of approval (including State approval conditions)	As per above	Links to relevant management plans is provided in: Section 1.4 (related management plans)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(i). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
j. commit to ensuring that a fauna spotter-catcher will be present during all clearance activities, with the authority to cease clearance for an appropriate timeframe where one or more protected matters could be impacted and relocate any fauna captured during clearing to an appropriate nearby habitat area to be undertaken by a fauna spotter-catcher	As per above	The use of fauna spotters is addressed within: - Section 5.7.2 (fauna spotter activities) - Section 6 (Monitoring and reporting) and Table 6-1 (Monitoring schedule)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(j). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
k. limit construction laydown areas and stockpiles to areas cleared or disturbed prior to the Action	As per above	Commitments for the siting of construction laydown areas and stockpiles in existing disturbed areas is provided in: Section 5.7.2 (clearing approach)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(k). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT



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Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
l. ensure 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 until the Koala leaves of its own accord	Check for/review: MNES Management Plan	Information on the process for Koala habitat clearing is provided in: Section 5.7.5 (clearing Koala habitat)	MNES Management Plan [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(l). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
m. commit to ensure the clearing width for all new and existing road and track widths within the project area do not exceed 15 metres	As per above	Commitments for vegetation clearing widths for road installation or widening are provided in: Section 5.7.5 (sensitive clearing technique)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(m). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
n. commit to install glider poles if the distance between trees at the road crossings in the riparian zone are greater than 15 m, to mitigate fragmentation of Greater Glider habitat	As per above	Commitments for the installation of Greater Glider poles are provided in: Section 5.7.7 (Glider pole installation – Greater Glider)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(n). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
o. include a commitment to install cameras facing the glider poles to monitor use of glider poles	As per above	Commitments for the installation of Greater Glider poles are provided in: Section 5.7.7 (Glider pole installation – Greater Glider)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(o). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
p. include 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 re-located to Greater Glider habitat in areas of retained vegetation, 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 H	As per above	Commitments for the salvage and re-use of Greater Glider hollows is provided in: - Section 5.7.6 (Salvaging tree hollows – Greater Glider) - Section 6.1 (Monitoring) and Table 6-1 (monitoring schedule)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(p). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT

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Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
q. include a commitment to reduce loss or injury of protected matters from barbed wire fencing through ensuring that barbed wire fencing is only used where it is required to meet the Australian safety standards or necessary for insurance. Where barbed wire is used, fence visibility to protected matters must be increased by affixing durable visibility tags, or tape, at every 30cm interval along top of barbed wire fencing for the duration of the approval	Check for/review: MNES Management Plan	Commitments on the use and application of barbed-wire fencing, and installation of tags and tape to mitigate fauna impact risk, is provided in: Section 5.7.6 (Salvaging tree hollows – Greater Glider).	MNES Management Plan [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(q). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
r. ensure areas of habitat for the Squatter Pigeon are flushed for Squatter Pigeon individuals immediately prior to clearing	As per above	Information on the process for flushing Squatter Pigeons prior to vegetation clearing is provided in: - Section 5.7.2 (fauna spotter activities) - Section 6 (Monitoring and reporting) and Table 6-1 (Monitoring schedule)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(r). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
s. require the placement of legible warning signs on all tracks that intersect locations in which Squatter Pigeon has been identified within the project area to inform all persons on site of areas that have a higher risk of vehicle collision and the need to be alert to risk of vehicle collision with Squatter Pigeon and drive slowly to prevent vehicle collision with Squatter Pigeon	As per above	Commitments on the installation of Squatter Pigeon awareness signage adjacent to roads and tracks intersecting Squatter Pigeon habitat is provided in: Section 5.3 (vehicle use)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(s). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
t. ensure land under all solar panels is revegetated with locally occurring grass species not considered to be invasive weeds or in contradiction to Condition 20y	As per above	Information on the revegetation under solar panels using local grass species is provided in: Section 5.8.1 (rehabilitation and revegetation)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(t). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
u. ensure a maximum speed of 50 km/hr for all vehicles within the project area	As per above	Commitments on the installation of a maximum project area speed limit of 50 km/hr is provided in: Section 5.3 (vehicle use) A maximum project area speed limit of 40 km/hr has been established, including the main site access road from Gladstone Mount Larcom Road.	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(u). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT

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Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
v. restrict vehicle access to within the project footprint and existing access routes	Check for/review: MNES Management Plan	Commitments for restricting vehicle access to the project (development) footprint are provided in: Section 5.3 (vehicle use)	Management Plans [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(v). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
w. keep artificial site lighting to the minimum required for safety. Lighting beams must be directed downwards and use shields and baffles to limit light spill beyond the area that requires lighting	As per above	Commitments for light spill minimisation and engineering controls are provided in: Section 5.7.1 (timing) Notwithstanding, the Approval Holder as advised that project construction has been undertaken exclusively during daylight hours (6.30 am to 6.30 pm). Therefore, no practical requirements has existed for lighting fixtures, including use of shields and baffles to limit light spill beyond work areas.	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(w). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
x. ensure refuelling is not undertaken within 50 metres of any waterway, retained habitat or riparian zone/s. Storage of fuels, chemicals, wastes and other potentially environmentally hazardous substances must be bunded or otherwise contained in areas away from waterways, retained habitat or riparian zone/s	As per above	Commitments for the siting of refuelling and hazardous substances facilities, and implementation of bunding and related management controls, are provided in: - Section 5.3 (vehicle use) - refuelling to occur >50m from waterways, retained habitat or riparian zones - Section 5.7.9 (riparian zones) - refuelling to occur >50m from riparian zones - Section 5.7.10 (erosion and sediment control) - fuel and chemical storage >50m from waterways, retained habitat or riparian zones. This commitment is also addressed in the project Construction Environmental Management Plan (Rev 2, dated 29-APR-2024).	MNES Management Plan [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023). Construction Environmental Management Plan (CEMP) [PLAN] ADSF-AEA-ENV-PLA-0005 r02 - Construction Environmental Management Plan - Aldoga Solar Farm, Rev 2, dated 29-APR-2024.	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(x). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
y. ensure the prevalence of weeds and feral animals identified as threats to protected matters are kept at less than the prevalence of weeds and feral animals prior to commencement of the Action	As per above	Commitments for the management of weeds and feral animals are provided in: - Section 5.5.1 (weed management) - Section 5.5.2 (feral animal control) Trigger values for corrective actions related to weeds and pest animals are also provided in Section 5.9 and Table 5-3 (risk assessment).	MNES Management Plan [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 20(y). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT

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Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
21	The MNES Management Plan at Condition 20 must include a monitoring program to ensure the environmental outcomes at Condition 19 are achieved. The monitoring program must:					
	a. include measurable performance indicators	Check for/review: MNES Management Plan NOTE – for purposes of the enclosed audit, it is noted that the existing and prior approval of the MNES Management Plan by the Minister is taken to be evidence that the approved MNES Management Plan satisfies this Condition 21.	Audit evidence reviewed and assessed to determine compliance with Condition 21 included: - MNES Management Plan. Measurable performance indicators are provided in: - Section 5.2 (S.M.A.R.T principles) (satisfying Condition 20(f)); and - Section 6 (Monitoring and Reporting) and Table 6-1 (Monitoring schedule)	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 21(a). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
	b. monitor use of Greater Glider poles through the installed cameras and report use of Greater Glider poles (by Greater Gliders or other animals) in the annual compliance records under condition 25	As per above	Commitments for the installation and monitoring of Greater Glider poles is provided in: Section 5.7.7 (Glider pole installation – Greater Glider) Per Condition 29(a), the annual compliance report for the first reporting period (13-NOV-2023 to 13-NOV-2024) is not due for publication until 60 business days following the end of the reporting period, being 10-FEB-2025. This compliance report due date falls outside the audit reporting window.	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023). <u>Evidence of Monitoring of Greater Glider Pole Installation and Use</u> Not applicable - not yet installed (not triggered).	Not applicable (not triggered)	NOT APPLICABLE
	c. maintain a register of Squatter Pigeon sightings and use it to identify and inform all persons on site of areas that have a higher risk of vehicle collision and the need to be alert to risk of vehicle collision with Squatter Pigeon and drive slowly to prevent vehicle collision with Squatter Pigeon	As per above	Commitments to maintain a register of MNES fauna sightings, including Squatter Pigeon, are provided in: Section 6.1 and Table 6-1 (Monitoring)	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 21(c). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
	d. trigger values for corrective Actions	As per above	Trigger values for corrective actions are provided in: Section 5.9 and Table 5-3 (risk assessment)	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 21(d). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT



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Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
e. the timing and frequency of monitoring to detect trigger values and changes in the performance indicators	As per above	Trigger values for corrective actions, including the timing and frequency of monitoring to detect trigger values and changes in the performance indicators, are provided in: Section 5.9 and Table 5-3 (risk assessment)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 21(e). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
f. proposed corrective Actions, if trigger values are reached.	As per above	Proposed actions if trigger values are reached are provided in: Section 5.9 and Table 5-3 (risk assessment)	As per above	The Auditor is satisfied that the MNES Management Plan satisfies the requirements of this Condition 21(f). This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
22 [Condition 22 as varied on 12 September 2024] The approval holder must ensure that rehabilitation of temporary infrastructure areas are undertaken within two months after the temporary infrastructure is removed and these areas are no longer required for the Action. The approval holder must ensure that rehabilitation returns rehabilitated areas to a self-sustaining ecosystem similar to that which existed before clearing and construction.	Check for/review: - rehabilitation schedule - audit site inspection	Not applicable (not triggered). Condition 22 relates to a future milestone not yet triggered as at the date of this audit. Audit evidence reviewed and assessed to determine compliance with Condition 22 included: - Approval Holder construction and rehab schedules - Audit Site Inspection (undertaken on 4-DEC-2024) Based on the evidence reviewed, and Approval Holder advice, there are no temporary infrastructure areas eligible for rehabilitation as at the time of audit as the project is still under construction and temporary infrastructure areas are still active and in use as at the date of audit.	Approval Holder Rehabilitation Schedule [PDF DOCUMENT] PV ALDOGA (389.2 MWn - 486.8MWp) Rehabilitation Schedule per Area - Baseline Schedule. Project Plant Gantt Chart containing planned schedule for progressive rehabilitation of temporary disturbance areas. Independent Audit - Site Inspection [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group).	Not applicable (not triggered)	NOT APPLICABLE
PART B – STANDARD ADMINISTRATIVE CONDITIONS					
23 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	Check for/confirm: - evidence of commencement notification to the Minister - date of Action commencement	Audit evidence reviewed and assessed to determine compliance with this condition included: - Approval Holder notification to the Minister regarding commencement of the action - Minister acknowledgement Notification of commencement of the Action by the Approval Holder was made to the Minister (c/o DCCEEW) on 20-NOV-2023, with a commencement of the Action being 13-NOV-2023. The Action commencement notification was made within ten (10) business days of the Action commencement date.	Evidence of Action Commencement Notification to the Minister [EMAIL] Aldoga Solar Farm - EPBC 2020/8773 - Action Commenced Notification. Acciona (Meagan Kay) to DCCEEW (epbcmmonitoring@dcceew.gov.au), dated 20-NOV-23, 8:51AM. Notification of 'Commencement of the Action' on 13-NOV-23.	The Auditor is satisfied that the notification of Action commencement was made by the Approval Holder to the Minister within the ten (10) business day timeframe required by this Condition 23. This determination is based on a review of written correspondence.	COMPLIANT
24 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	Check for/confirm: - evidence of commencement notification to the Minister - date of Action commencement	Not applicable (not triggered). As per above, the Action commenced on 13-NOV-2023. Therefore, Condition 24 has not and will not be triggered.	As per above	Not applicable (not triggered)	NOT APPLICABLE



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Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
25	The approval holder must maintain accurate and complete compliance records.	Check for approval holder systems and processes for maintain EPBC-related records. To include, but not limited to: - inspection records - technical reports (e.g. ecological survey reports) - incident records - systems to host these records	Audit evidence reviewed and assessed to validate compliance with this condition included a review of representative, example compliance records and electronic systems for the storage of these records. This included: - example general inspection records - example ecological survey reports - document management system and incident management systems. Noting that an exhaustive review of all potential compliance record types was not undertaken the Auditor is satisfied that, on the basis of representative evidence reviewed, relevant compliance records are being maintained by the Approval Holder and has appropriate systems for the storage of these records.	Example General Inspection Records [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Proforma checklist covering general aspects of soil, water, air quality, waste management, fauna risk/harm, fire management and ground rehabilitation. Sample of completed checklists reviewed: - Inspection ID NS.0000045693 (3-OCT-2024): 2024.10.03 Drone Compliance Checks - Inspection ID INS.0000045333 (26-NOV-2024): Area J Clear and Grub Inspection - Inspection ID INS.0000045691 (1-DEC-2024): Lot 2 Fenceline Inspection Example Ecological Survey Reports and Records [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. Example Pest and Feral Animal Management Records [REGISTER] ADSF - Flora and Fauna Register - Pest Extract. Pest Animal Register (un-dated PDF document). Register of pest animal sightings for the period 4-DEC-2023 to 21-OCT-2024. Approval Holder Document Management and Incident Management Systems [MANAGEMENT SYSTEM] Acciona Document Control System, 'InEight' [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'	The Auditor is satisfied that the Approval Holder maintains compliance records relevant to this Approval and has appropriate systems for the storage of these records. This determination is based on: - A review of representative compliance records - Visual review of the Approval Holder document, spatial and incident management systems.	COMPLIANT
26	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	Check for any instance of Department requests for information, and evidence on approval holder responses within specified timeframes. Review relevant electronic and other written communication records.	Not applicable (not triggered). There were no instances or records of Minister (DCCEE) correspondence to the Approval Holder requesting compliance records or other information in the period between the notification of commencement of the action (13-NOV-2023) and the date of this audit.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE

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Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
27	The approval holder must:					
	a. submit plans electronically to the department	Confirm method of plan lodgement for: - OAMPs - MNES Management Plan	Audit evidence reviewed and assessed to validate compliance with this condition included a review of Approval Holder correspondence to DCCEEW showing lodgement of all statutory plans required under EPBC 2020/8773. The statutory plans required by EPBC 2020/8773 relevant to Condition 27(a) are: - OAMPs (per Condition 5) - MNES Management Plan (per Condition 15) The OAMPs were submitted to the Minister (via DCCEEW) on 13-DEC-2022. The MNES Management Plan was submitted to the Minister (via DCCEEW) on 27-APR-2023. The Approval Holder advised that all plans were submitted electronically via the DCCEEW 'SigBox' secure file transfer portal, with plans accessed by DCCEEW for download on 20-JUN-2023.	Evidence of OAMP Approval [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023. Evidence of MNES Management Plan Approval As per above - the OAMPs and MNES Management Plan were approved by the Minister (c/o DCCEEW) in the same letter of approval dated 5-OCT-2023.	The Auditor is satisfied that all management plans required under the conditions of Approval were submitted electronically to the Department.	COMPLIANT
27	b. unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date:	Check/confirm: - website address for published plans - date of publication / upload - plans are accessible (can be opened and downloaded)	Audit evidence reviewed and assessed to validate compliance with this condition included: - Approval Holder lodgement of all statutory plans required under EPBC 2020/8773 - Minister response and approval of these plans - Approval Holder correspondence to DCCEEW confirming publication/upload of these plans. The statutory plans required by EPBC 2020/8773 and subject to approval by the Minister are: - OAMPs (per Conditions 5 and 9) - MNES Management Plan (per Conditions 15 and 17). The OAMPs were approved by the Minister on 5-OCT-2023 and published/uploaded to the Approval Holder's website on 30-OCT-2023 (upload and notification to DCCEEW occurred within 17 business days). The MNES Management Plan was approved by the Minister on 5-OCT-2023 and published/uploaded to the Approval Holder's website on 30-OCT-2023 (upload and notification to DCCEEW occurred within 17 business days). A Threatened Species Impact and Translocation Management Plan (TSITMP) (otherwise titled as the 'Cycas Megacarpa Translocation Plan') was also produced (Greentape Solutions, June 2023) to satisfy Condition 3 of EPBC 2020/8773 in the event more than four (4) <i>Cycas Megacarpa</i> individuals would be translocated, with this 'translocation plan' to be approved by the Minister if Condition 3 was triggered. This TSITMP is also published to the Approval Holder's website. All current plans are published at https://www.accion.com.au/aldoga . All plans were accessible and could be downloaded at the time of the audit (accessed 7-JAN-2025).	Evidence of Management Plan Publication [E-MAIL] Aldoga Solar Farm - Management Plan Publication. Email from Acciona (Meagan Kay) dated 30-OCT-2023 notifying DCCEEW of publication of plans to Approval Holder website (https://www.accion.com.au/aldoga). Approval Holder Website https://www.accion.com.au/aldoga Evidence of OAMP Approval [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023. Evidence of MNES Management Plan Approval As per above - the OAMPs and MNES Management Plan were approved by the Minister (c/o DCCEEW) in the same letter of approval dated 5-OCT-2023.	The Auditor is satisfied that all statutory management plans required under the Conditions of Approval: - were published within the required twenty (20) business day timeframe following Minister approval - these plans were accessible at the time of audit. This determination is based on: - review of records of management plan lodgement and Minister approval - inspection of the Approval Holders website and testing of accessibility of published plans.	COMPLIANT
27	(i) the plan is approved by the Minister in writing, if the plan requires the approval of the Minister, or					
	(ii) the plan is submitted to the Minister or the department in accordance with a requirement of these conditions, if the plan does not require the approval of the Minister, or					
27	(iii) the plan is approved by a state/territory government official as required under a state/territory government condition which must be complied with in accordance with these EPBC Act conditions					

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Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public	Check for/confirm: - website address for published plans - if any content is redacted.	Audit evidence reviewed and assessed to validate compliance with this condition included a review of published management plans as available at https://www.acciona.com.au/aldoga . This included: - OAMPs - MNES Management Plan - Threatened Species Impact and Translocation Management Plan ('Cycas Megacarpa Translocation Plan'. No redacted content was identified. Advice from the Approval Holder (Lachlan Cooksey, pers. Comm) confirms that no plans contain sensitive ecological data that requires redaction. The Auditor notes that the published MNES Management Plan includes the original EPBC Approval as Appendix F. It is recommended that this plan be updated and re-published to include the current EPBC Approval as varied 12-SEP-2024 (administrative update).	Approval Holder Website https://www.acciona.com.au/aldoga (accessed 7-JAN-2025) Approval Holder Published Management Plans [PLAN] Offset Area Management Plan – Aldoga South 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023). [PLAN] Offset Area Management Plan – Aldoga North 2020/8773 Aldoga Solar Project – Expansion Area (version FV4, 9-AUG-2023 [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023). [PLAN] Threatened Species Impact and Translocation Management Plan ('Cycas Megacarpa Translocation Plan') - Aldoga Solar Farm Expansion Area (version B2.2, 28-JUN-2023).	The Auditor is satisfied that the published management plans do not contain sensitive content that requires redaction. This determination is based on advice from the Approval Holder that no plans contain sensitive ecological data that requires redaction. <u>Observation</u> The published MNES Management Plan includes the original EPBC Approval as Appendix F. It is recommended that this plan be updated and re-published to include the current EPBC Approval as varied 12-SEP-2024 (administrative update).	COMPLIANT	
d. keep plans published on the website until the end date of this approval	Check/confirm: - website address for published plans - plans are accessible (can be opened and downloaded)	Audit evidence reviewed and assessed to validate compliance with this condition included a review of published management plans as available at https://www.acciona.com.au/aldoga . This included: - Offset Area Management Plan – Aldoga South - Offset Area Management Plan – Aldoga North - MNES Management Plan - Threatened Species Impact and Translocation Management Plan ('Cycas Megacarpa Translocation Plan'. The Auditor confirms that, as the time of audit, all current plans are published at https://www.acciona.com.au/aldoga (accessed 7-JAN-2025) and are accessible.	As per above	The Auditor is satisfied that: - all statutory management plans required under EPBC 2020/8773 have been published to the Approval Holder's website; and - these plans were accessible at the time of the audit. This determination is based on an inspection of the Approval Holders website and testing of accessibility of published plans.	COMPLIANT	
28	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 in accordance with the requirements of the plan and published on the approved holder's website (excluding sensitive ecological data)	Review a sample of project spatial data records (maps, figures, reports), including: - compliance with the format requirements in the Guidelines - evidence of electronic submission to the Department - evidence of publication on the Approval Holder's website	Not applicable (not triggered). As at the time of audit, only the MNES Management Plan has been implemented and is in effect. Per Section 6.1 of the MNES Management Plan, the publication of monitoring data is limited to data provided within annual compliance reports. Per Condition 29(a), the annual compliance report for the first reporting period (13-NOV-2023 to 13-NOV-2024) is not due for publication until 60 business days following the end of the reporting period, being 10-FEB-2025. This compliance report due date falls outside the audit reporting window. Notwithstanding, the Auditor sighted a draft-in-development Annual Compliance Report (un-published at the time of audit) as evidence of report preparation pending future lodgement.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE



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Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
29	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:	Check: - status of annual compliance report applicable to current audit period - evidence of publication on the Approval Holder's website and/or lodgement to the Department	Not applicable (not triggered). Condition 29 relates to a future milestone not yet triggered as at the date of this audit. Compliance cannot be verified at this time. Commencement of the Action commenced on 13-NOV-2023, with the first 12-month compliance reporting period effective from 13-NOV-2024. Per Condition 29(a), the annual compliance report for the first reporting period (13-NOV-2023 to 13-NOV-2024) is not due for publication until 60 business days following the end of the reporting period, being 10-FEB-2025. This compliance report due date falls outside the audit reporting window. Notwithstanding, the Auditor sighted a draft-in-development Annual Compliance Report (un-published at the time of audit) as evidence of report preparation pending future lodgement.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
a.	publish each compliance report on the approval holder's website within 60 business days following the relevant 12-month period	As per above	As per above	As per above	As per above	NOT APPLICABLE
b.	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	As per above	As per above	As per above	As per above	NOT APPLICABLE
c.	keep all compliance reports publicly available on the approval holder's website until this approval expires	As per above	As per above	As per above	As per above	NOT APPLICABLE
d.	exclude or redact sensitive ecological data from compliance reports published on the website	As per above	As per above	As per above	As per above	NOT APPLICABLE
e.	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	As per above	As per above	As per above	As per above	NOT APPLICABLE
30	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:	Check for evidence of any incident or non-compliances, to include: - incident records - timing of events and when notified to the Department	Not applicable (not triggered). There were no instances of notifications by the Approval Holder to the Department (DCCEEW) during the reporting period 13-NOV-2023 to 13-NOV-2024 in relation to any: - incidents; or - non-compliance with conditions; or - non-compliance with commitments made in any plans required under the conditions of approval. This determination does not and cannot consider the outcomes of this enclosed audit as this may result in a circular audit finding. Approval Holder compliance with this Condition 30, as it relates to this audit report, can only be evaluated in the next reporting/audit period.	Not applicable	Not applicable (not triggered). This determination does not and cannot consider the outcomes of this enclosed audit as this may result in a circular audit finding. Approval Holder compliance with this Condition 30, as it relates to this audit report, can only be evaluated in the next reporting/audit period.	NOT APPLICABLE
a.	any condition which is or may be in breach	As per above	As per above	As per above	As per above	NOT APPLICABLE
b.	a short description of the incident and/or non-compliance	As per above	As per above	As per above	As per above	NOT APPLICABLE



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
c.	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.	As per above	As per above	As per above	As per above	NOT APPLICABLE
31	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:	Check for evidence of any incident or non-compliances with plans, to include: - incident or non-compliance records - investigation records - timing of events and when notified to the Department	Not applicable (not triggered). There were no instances of notifications by the Approval Holder to the Department (DCCEEW) during the reporting period 13-NOV-2023 to 13-NOV-2024 in relation to any: - incidents; or - non-compliance with conditions; or - non-compliance with commitments made in any plans required under the conditions of approval. This determination does not and cannot consider the outcomes of this enclosed audit as this may result in a circular audit finding. Approval Holder compliance with this Condition 31, as it relates to this audit report, can only be evaluated in the next reporting/audit period.	Not applicable	Not applicable (not triggered). This determination does not and cannot consider the outcomes of this enclosed audit as this may result in a circular audit finding. Approval Holder compliance with this Condition 31, as it relates to this audit report, can only be evaluated in the next reporting/audit period.	NOT APPLICABLE
a.	any corrective Action or investigation which the approval holder has already taken or intends to take in the immediate future	As per above	As per above	As per above	As per above	NOT APPLICABLE
b.	the potential impacts of the incident or non-compliance	As per above	As per above	As per above	As per above	NOT APPLICABLE
c.	the method and timing of any remedial Action that will be undertaken by the approval holder	As per above	As per above	As per above	As per above	NOT APPLICABLE



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
32	<i>[Condition 32 as varied on 12 September 2024]</i> The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period	Not applicable	Condition 32 is satisfied by this Independent Audit and Auditor's Report.	Not applicable	Compliance with this Condition 32 is satisfied by this Independent Audit and Auditor's Report.	COMPLIANT
a.	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period	Check for/confirm: - evidence of commencement notification to the Minister - evidence of Independent Auditor appointment notification to the Department.	Audit evidence reviewed and assessed to validate compliance with this condition included: - Approval Holder notification to the Minister regarding commencement of the action - Approval Holder notification of Independent Auditor appointment. Notification of commencement of the Action by the Approval Holder was made to the Minister (c/o DCCEEW) on 20-NOV-2023, with a commencement of the Action being 13-NOV-2023. The 12-month audit period relevant to this audit, and assessment of compliance to Condition 32(a), is therefore 13-NOV-2023 to 13-NOV-2024. Approval Holder notification of Independent Auditor appointment and auditor details was provided to DCCEEW on 18-NOV-2024. This notification was provided within 10 business days. The Auditor notes that supplementary information (Independent Auditor Declarations, Qualifications and Prior Experience) was prepared by the Auditor for the Approval Holder and submitted to the Department (DCCEEW) as further supporting information to the initial notification dated 18-NOV-2024.	Action Commencement Notification to the Minister [EMAIL] Aldoga Solar Farm - EPBC 2020/8773 - Action Commenced Notification. Acciona (Meagan Kay) to DCCEEW (epbcmmonitoring@dcceew.gov.au), dated 20-NOV-23, 8:51AM. Notification of 'Commencement of the Action' on 13-NOV-23. Notification of Independent Auditor Details [EMAIL W/ PDF LETTER ATTACHMENT] Aldoga Solar Farm - EPBC2020/8773 - Notice of Independent Auditor Details. Acciona (Meagan Kay) to DCCEEW (audit@dcceew.gov.au), dated 18-NOV-2024. Notification of Independent Auditor Details - Supplementary Information [PDF LETTER] EPBC 2020/8773 – Condition 32 – Independent Auditor Declarations, Qualifications and Prior Experience. Attexo Group (Nick Travers) to Acciona (Meagan Kay), dated 28-NOV-2024. [EMAIL W/ PDF LETTER ATTACHMENT] RE: EXT: RE: Aldoga Solar Farm - EPBC2020/8773 - Notice of Independent Auditor Details [SEC=OFFICIAL]. Acciona (Meagan Kay) to DCCEEW (audit@dcceew.gov.au), dated 28-NOV-2024. Provision of Independent Auditor Independent Auditor Declarations, Qualifications and Prior Experience.	The Auditor is satisfied that notification of Independent Auditor appointment and auditor details was provided by the Approval Holder to the Department (DCCEEW) within the ten (10) business day timeframe required by this Condition 32(a). This determination is based on a review of Approval Holder written correspondence to the Department.	COMPLIANT
b.	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan	Not applicable (not auditable)	Not applicable (Auditor conflict of interest). The Auditor is unable to provide a determination against this Condition 32(b) given conflict-of-interest, that is, making a determination on the appropriateness of its own scope of engagement to the Approval Holder. Notwithstanding, the Auditor notes that the scope if its engagement (referring to Attexo Fee Proposal dated 2-OCT-2024, commercial-in-confidence) includes undertaking the independent audit: - per Conditions 32 through 34 of the approval (as varied 12-SEP-2024) - per the DCCEEW Independent Audit and Audit Report Guidelines (2019), excepting the exclusions noted under Condition 32 of the approval (as varied 12-SEP-2024) - with a sufficient scope to assess the compliance status of each condition of the approval, and each commitment made in each plan.	Independent Auditor - Audit Scope [FEE PROPOSAL] Proposal for delivery of an independent compliance audit for the Aldoga Solar Farm. Fee proposal from Attexo Group Pty Ltd to Acciona, dated 2-OCT-2024. Commercial-in-confidence.	Not applicable. The Auditor is unable to provide a determination against this Condition 32(b) given conflict-of-interest, that is, making a determination on the appropriateness of its own scope of engagement to the Approval Holder.	NOT APPLICABLE

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
c. The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Independent Audit and Audit Report Guidelines	Not applicable (not auditable)	Not applicable (Auditor conflict of interest). The Auditor is unable to provide a determination against this Condition 32(c) given this is a matter for the Approval Holder. Notwithstanding, the Auditor notes that the scope if its engagement (referring to Attexo Fee Proposal dated 2-OCT-2024, commercial-in-confidence) includes undertaking the independent audit: - per Conditions 32 through 34 of the approval (as varied 12-SEP-2024) - per the DCCEEW Independent Audit and Audit Report Guidelines (2019), excepting the exclusions noted under Condition 32 of the approval (as varied 12-SEP-2024) - with a sufficient scope to assess the compliance status of each condition of the approval, and each commitment made in each plan.	Independent Auditor - Audit Scope [FEE PROPOSAL] Proposal for delivery of an independent compliance audit for the Aldoga Solar Farm. Fee proposal from Attexo Group Pty Ltd to Acciona, dated 2-OCT-2024. Commercial-in-confidence.	Not applicable. The Auditor is unable to provide a determination against this Condition 32(c) given this is a matter for the Approval Holder.	NOT APPLICABLE
33 <i>[Condition 33 as varied on 12 September 2024]</i> The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing	Condition is satisfied by the enclosed Independent Audit Report	Audit evidence reviewed and assessed to validate compliance with this condition included: Approval Holder notification to the Minister regarding commencement of the action. Notification of commencement of the Action by the Approval Holder was made to the Minister (c/o DCCEEW) on 20-NOV-2023, with a commencement of the Action being 13-NOV-2023. The 12-month audit period relevant to this audit, and assessment of compliance to Condition 32(a), is therefore 13-NOV-2023 to 13-NOV-2024. This audit report is due for submission by 13-FEB-2025.	Not applicable (not yet triggered). Compliance with this Condition 33 is satisfied by this Independent Audit and Auditor's Report.	Not applicable (not yet triggered). Compliance with this Condition 33 is satisfied by this Independent Audit and Auditor's Report.	NOT APPLICABLE
a. The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Independent Audit and Audit Report Guidelines	Not applicable (not auditable)	Not applicable (Auditor conflict of interest). This audit and Audit Report has been undertaken in accordance with the DCCEEW Independent Audit and Audit Report Guidelines (2019), excepting the exclusions noted under Condition 32 of the approval (as varied 12-SEP-2024). Evaluation of the adequacy of the Audit Report, and satisfaction of the Minister, is a matter for the Approval Holder and the Department (DCCEEW).	Not applicable	Not applicable. The evaluation of the adequacy of this Audit Report, and satisfaction of the Minister, is a matter for the Approval Holder and Department (DCCEEW).	NOT APPLICABLE
34 <i>[Condition 34 as varied on 12 September 2024]</i> The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date the department agrees to that audit report in writing	Not applicable (not auditable)	Not applicable. Condition 34 will be satisfied by the future publication of this Independent Audit and Auditor's Report. Independent Auditor assessment of compliance will be addressed in the next annual Independent Audit for Reporting (Reporting Year No. 2).	Not applicable	Compliance with this Condition 34 is satisfied by this Independent Audit and Auditor's Report.	NOT APPLICABLE
a. The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website	As per above	As per above	As per above	As per above	NOT APPLICABLE

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
b.	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval	As per above	As per above	As per above	As per above	NOT APPLICABLE
35	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 (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous Action management plan	If required plans have previously been approved, check: - if any have been varied requiring approval from the Minister - if varied plans have been approved and are published on the approvals holder's website	Not applicable (not triggered). There were no requests by the Approval Holder to vary any existing approved Action management plans during the reporting period 13-NOV-2023 to 13-NOV-2024.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
36	The approval holder may choose to revise an Action management plan approved by the Minister under Condition 15 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 RAMP would not be likely to have a new or increased impact	If required plans have previously been approved: - check if any have been subject to minor or administrative variations and not submitted for approval by the Minister - evaluate whether the variation has, or would not, result in any new or increased impact on MNES covered by the approval	Not applicable (not triggered). There were no variations to any existing approved Action management plans by the Approval Holder, pursuant to Condition 15, during the reporting period 13-NOV-2023 to 13-NOV-2024.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE

Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
37	If the approval holder makes the choice under Condition 36 to revise an Action management plan without submitting it for approval, the approval holder must:	If required plans have been subject to minor or administrative variations not requiring Minister approval, review the plan(s) check for compliance with the sub-conditions.	Not applicable (not triggered). There were no variations to any existing approved Action management plans by the Approval Holder, pursuant to Condition 36, during the reporting period 13-NOV-2023 to 13-NOV-2024.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
	a. notify the department in writing that the approved Action management plan has been revised and provide the department with: (i) an electronic copy of the RAMP (ii) an electronic copy of the RAMP marked up with track changes to show the differences between the approved Action management plan and the RAMP (iii) an explanation of the differences between the approved Action management plan and the RAMP (iv) the reasons the approval holder considers that taking the Action in accordance with the RAMP would not be likely to have a new or increased impact (v) written notice of the date on which the approval holder will implement the RAMP (RAMP 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.	As per above	As per above	As per above	As per above	NOT APPLICABLE
	b. subject to Condition 39, implement the RAMP from the RAMP implementation date	As per above	As per above	As per above	As per above	NOT APPLICABLE
38	The approval holder may revoke their choice to implement a RAMP under Condition 36 at any time by giving written notice to the department. If the approval holder revokes the choice under Condition 36 the approval holder must implement the Action management plan in force immediately prior to the revision undertaken under Condition 36	If required plans have previously been approved: - check if any have been subject to minor or administrative variations - check if any varied plans have been revoked by the approval holder	Not applicable (not triggered). There were no variations to any existing approved Action management plans by the Approval Holder, pursuant to Condition 36, during the reporting period 13-NOV-2023 to 13-NOV-2024.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
39	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 RAMP would be likely to have a new or increased impact, then:	If any required plans have been varied and not approved by the Minister on the grounds that the plan variation will of new or increased impacts, check for compliance with the sub-conditions.	Not applicable (not triggered). No notices were issued by the Minister under Condition 39 during the reporting period 13-NOV-2023 to 13-NOV-2024.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
	a. Condition 36 does not apply, or ceases to apply, in relation to the RAMP	Not applicable – not an auditable condition	As per above	As per above	As per above	NOT APPLICABLE



Conditions of EPBC Approval 2020/8773 – Audit Criteria, Methodology and Detailed Findings

Condition / Sub-Condition		Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
b.	the approval holder must implement the Action management plan specified by the Minister in the notice	As above – check that the original approved plans have been implemented. To include: - review of plan revision history - review of which plan version has been published	As per above	As per above	As per above	NOT APPLICABLE
40	At the time of giving the notice under condition 39 the Minister may also notify that for a specified period of time, condition 36 does not apply for one or more specified Action management plans.	Not applicable – not an auditable condition	Not applicable (not triggered). No notices were issued by the Minister under Condition 40 during the reporting period 13-NOV-2023 to 13-NOV-2024.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
41	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire	Cannot be verified at this time – Condition 8 relates to a future milestone (approval expires 31 st December 2080)	Not applicable (not triggered). Condition 41 relates to a future milestone not yet triggered as at the date of this audit. Compliance cannot be verified at this time.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
42	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data	If the action has been completed prior to the date of audit, check that written notification of completion has been provided to the Department.	Not applicable (not triggered). Condition 42 relates to a future milestone not yet triggered as at the date of this audit - the Action commenced on 13-NOV-2023 and is ongoing as at the time of audit.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE



2.2 Action Management Plans

2.2.1 Aldoga South – Offset Area Management Plan (OAMP)

No findings could be made in relation to commitments within the Offset Area Management Plans (OAMPs), as these only become effective when the offsite sites have been legally secured, and the subsidiary Offset Area Operational Plans (OAOPs) implemented. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites identified in the OAMPs, and thus the OAOPs are still in development and are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered).

Notwithstanding, audit commentary against commitments within the Aldoga South Offset Area Management Plan (OAMP) (Version FV4, 9-AUG-2023) is provided in **Table 2.2**.

Table 2.2: Detailed audit findings – Aldoga South OAMP commitments

Offset Area Management Plan (OAMP) Commitments – Audit Criteria, Methodology and Detailed Findings					
Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Increase Koala, Greater Glider and Squatter Pigeon habitat quality					
Reduce weed cover to less than 5% across the offset site	Check for/review monitoring records that evaluate weed diversity, cover and abundance. To include: - LFA / EFA reports (if applicable) - formal ecological survey reports - other records (as relevant)	Section 4.6 of the OAMPs states that offset sites will be legally secured within 24 months of the OAMP approval through voluntary declarations made under Section 19E and 19F of the Queensland <i>Vegetation Management Act 1999</i> . The OAMPs were approved by the Minister on 5-OCT-2023, thus the offset sites must be secured by 5-OCT-2025. Per Section 4.3 of the OAMPs, the subsidiary Offset Area Operational Plans (OAOPs) will detail the key on-ground management actions to be implemented within the offset sites, once secured, to protect maintain ecological values. These OAOPs will be developed for each offset site within 12 months of legal security of the offset site land. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites identified in the OAMPs, and thus the OAOPs are still in development and are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered).	Not applicable	Not applicable. The Approval Holder is still in the process of: - securing the Aldoga South offset properties; and - developing the subsidiary OAOP that will guide on-ground management actions consistent with the overarching OAMP. On this basis, Approval Holder compliance with the Aldoga South OAMP cannot be verified at this time.	NOT APPLICABLE
Manage grazing to control weeds and promote grass cover that is suitable for the target species	Check for/review: - records of controlled grazing - grazing activities as it relates to weed and grass cover				
Manage grazing to improve recruitment of eucalypts suitable for Greater Glider and Koala and to manage fuel loads	Check for/review: - records of controlled grazing - ecological surveys that assess grazing activities in relation to eucalypt recruitment - other (as relevant)				
Implement fire management to protect habitat and enhance habitat quality	Check for/review: - records of controlled burns - post-burn ecological surveys that assess trends in ecosystem ecological function				
Provide commensurate Greater Glider den resources by ensuring a ratio of one (existing) hollow or one nest box (installed) per denning tree (trees over 50 cm DBH) removed within the impact area (counted at the time of clearing) across the north & south offset areas, to ensure a total minimum of 300 natural or artificial dens for Greater Glider within the offset areas	Check for/review: - statistical records, including GIS data, that show dens cleared versus reinstated or reproduced - check the provision of reinstated or reproduced dens is equal to data on dens cleared				
Reduce threats					
Reduce predation threats to all species through active management	Check for/review: - weed and pest monitoring records - visual evidence of in-field pest control measures (e.g. exclusion fencing, baiting, trapping and shooting) - evidence of recurring environmental monitoring (inspections, formal ecological survey reports, etc) that evaluate trends in pest species diversity and abundance	As per above	As per above	As per above	NOT APPLICABLE



Offset Area Management Plan (OAMP) Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Legal protection					
Legally secure the offset site through a Voluntary Declaration	Check for/review: - status of OAMP South Offset site - status of registration on Title - mechanism of registration on Title and associated record (e.g. copy of Title Plans and Dealings)	As per above	As per above	As per above	NOT APPLICABLE
Monitoring and adaptive management					
Monitoring at regular intervals until completion criteria are met	Check for/review evidence of any rehabilitation monitoring. To include: - rehabilitation progress / completion reports - rehabilitation monitoring reports (e.g. LFA/EFA reports) - photo-point records - visual inspection	As per above	As per above	As per above	NOT APPLICABLE
Reporting to identify progress to completion criteria and any triggers for management	As per above	As per above	As per above	As per above	NOT APPLICABLE



2.2.2 Aldoga North – Offset Area Management Plan (OAMP)

No findings could be made in relation to commitments within the Offset Area Management Plans (OAMPs), as these only become effective when the offsite sites have been legally secured, and the subsidiary Offset Area Operational Plans (OAOPs) implemented. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites identified in the OAMPs, and thus the OAOPs are still in development and are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered).

Notwithstanding, audit commentary against commitments within the Aldoga North Offset Area Management Plan (OAMP) (Version FV4, 9-AUG-2023) is provided in **Table 2.3**.

Table 2.3: Detailed audit findings – Aldoga North OAMP commitments

Offset Area Management Plan (OAMP) Commitments – Audit Criteria, Methodology and Detailed Findings					
Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Increase Koala, Greater Glider and Squatter Pigeon habitat quality					
Reduce weed cover to less than 5% across the offset site	Check for/review monitoring records that evaluate weed diversity, cover and abundance. To include: - LFA / EFA reports (if applicable) - formal ecological survey reports - other records (as relevant)	Section 4.6 of the OAMPs states that offset sites will be legally secured within 24 months of the OAMP approval through voluntary declarations made under Section 19E and 19F of the Queensland <i>Vegetation Management Act 1999</i> . The OAMPs were approved by the Minister on 5-OCT-2023, thus the offset sites must be secured by 5-OCT-2025. Per Section 4.3 of the OAMPs, the subsidiary Offset Area Operational Plans (OAOPs) will detail the key on-ground management actions to be implemented within the offset sites, once secured, to protect maintain ecological values. These OAOPs will be developed for each offset site within 12 months of legal security of the offset site land. At the time of audit, the Approval Holder is still progressing the legal securing of the nominated offsite sites identified in the OAMPs, and thus the OAOPs are still in development and are not yet in place (i.e. the implementation of the OAOPs has not yet been triggered).	Not applicable	Not applicable. The Approval Holder is still in the process of: - securing the Aldoga North offset properties; and - developing the subsidiary OAOP that will guide on-ground management actions consistent with the overarching OAMP. On this basis, Approval Holder compliance with the Aldoga North OAMP cannot be verified at this time.	NOT APPLICABLE
Manage grazing to control weeds and promote grass cover that is suitable for the target species	Check for/review: - records of controlled grazing - grazing activities as it relates to weed and grass cover				
Manage grazing to improve recruitment of eucalypts suitable for Greater Glider and Koala and to manage fuel loads	Check for/review: - records of controlled grazing - ecological surveys that assess grazing activities in relation to eucalypt recruitment - other (as relevant)				
Implement fire management to protect habitat and enhance habitat quality	Check for/review: - records of controlled burns - post-burn ecological surveys that assess trends in ecosystem ecological function				
Provide commensurate Greater Glider den resources by ensuring a ratio of one (existing) hollow or one nest box (installed) per denning tree (trees over 50 cm DBH) removed within the impact area (counted at the time of clearing) across the north & south offset areas, to ensure a total minimum of 300 natural or artificial dens for Greater Glider within the offset areas	Check for/review: - statistical records, including GIS data, that show dens cleared versus reinstated or reproduced - check the provision of reinstated or reproduced dens is equal to data on dens cleared				
Reduce threats					
Reduce predation threats to all species through active management	Check for/review: - weed and pest monitoring records - visual evidence of in-field pest control measures (e.g. exclusion fencing, baiting, trapping and shooting) - evidence of recurring environmental monitoring (inspections, formal ecological survey reports, etc) that evaluate trends in pest species diversity and abundance	As per above	As per above	As per above	NOT APPLICABLE



Offset Area Management Plan (OAMP) Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Legal protection					
Legally secure the offset site through a Voluntary Declaration	Check for/review: - status of OAMP South Offset site - status of registration on Title - mechanism of registration on Title and associated record (e.g. copy of Title Plans and Dealings)	As per above	As per above	As per above	NOT APPLICABLE
Monitoring and adaptive management					
Monitoring at regular intervals until completion criteria are met	Check for/review evidence of any rehabilitation monitoring. To include: - rehabilitation progress / completion reports - rehabilitation monitoring reports (e.g. LFA/EFA reports) - photo-point records - visual inspection	As per above	As per above	As per above	NOT APPLICABLE
Reporting to identify progress to completion criteria and any triggers for management	As per above	As per above	As per above	As per above	NOT APPLICABLE



2.2.3 MNES Management Plan

Detailed audit findings for commitments within the MNES Management Plan (Version V2.3, 1-AUG-2023) are provided in **Table 2.4**.

The commitments audited are taken from the following sections of the plan:

- Section 5 – Management actions and risk assessment
- Section 6 – Monitoring and reporting
- Section 7 – Training.

Table 2.4: Detailed audit findings – MNES Management Plan commitments

MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings					
Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
SECTION 5 - MANAGEMENT ACTIONS AND RISK ASSESSMENT					
s5.1 - Clearing limits Management actions will be implemented to ensure the following clearing limits for MNES are not exceeded, in accordance with Condition 2 of the EPBC approval:	Check for/review as-disturbed areas against EPBC-approval areas (per EPBC Approval – Attachment A). To include: - review of GIS data (land survey of as-cleared areas and recent aerial imagery) - visual inspection.	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial maps and data, showing approved clearing extents and as-cleared ground - the Approval Holder Incident Management System ('Enablon') - review of environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024). - site inspection of several disturbance areas to assess implementation of ground-level controls to preserve clearing limits. Spatial records reviewed indicate that habitat clearing limits for Koala, Squatter Pigeon and Greater Glider have been maintained, with all habitat clearance within approved areas. Spatial data shows the following actual vs. approved clearance limits as at the time of audit: - Koala habitat: 269.72 Ha approved, 212 Ha actual - Squatter Pigeon habitat: 259.20 Ha approved, 202 Ha actual - Greater Glider Habitat: 258.77 Ha approved, 202 Ha actual. There were no recorded instances of clearing limit exceedances identified based on a visual review of the Approval Holder's incident management system. Noting that all vegetation clearing had been completed and construction nearing completion as at the time of audit, Auditor is satisfied that the requirements of this Condition 2, and sub-conditions (a) through (c), have been met.	<u>Spatial Data and Maps</u> [SPATIAL MAP] GIS Figure (un-dated) - ADSF Koala Habitat. Figure showing mapped Koala Habitat extent, and reconciliation of habitat area approved for clearing (269.72 Ha) versus total habitat area cleared (212 Ha). [SPATIAL MAP] GIS Figure (un-dated) - ADSF Squatter Pigeon Habitat. Figure showing mapped Koala Habitat extent, and reconciliation of habitat area approved for clearing (259.20 Ha) versus total habitat area cleared (202 Ha). [SPATIAL MAP] Figure (un-dated) - ADSF Greater Glider Habitat. Figure showing mapped Greater Gliding Habitat extent and reconciliation of habitat area approved for clearing (258.77 Ha) versus total habitat area cleared (202 Ha). <u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive conditions on clearing, weed management, clearing limits and other controls. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Representative visual inspection of several cleared areas and in-field delineation of clearing limit boundaries. <u>Acciona Incident Management System</u> [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that: - No more than 269.72 Ha of Koala habitat has been cleared - No more than 259.20 Ha of Squatter Pigeon habitat has been cleared - No more than 258.77 of Greater Glider habitat has been cleared. This determination is based on: - review of the spatial/GIS records - Auditor site inspection.	COMPLIANT
269.72 ha of suitable Koala habitat	As per above	As per above	As per above	As per above	COMPLIANT
258.77 ha of suitable habitat for Greater Glider	As per above	As per above	As per above	As per above	COMPLIANT
259.20 ha of suitable habitat for Squatter Pigeon	As per above	As per above	As per above	As per above	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
no more than four <i>Cycas megacarpa</i> individuals	Check for/review: - pre-clearance survey reports - Cycas translocation records	Audit evidence reviewed and assessed to determine compliance with this condition included: - MNES Management Plan - Threatened Species Impact and Translocation Management Plan (TSITMP) ('Cycas Megacarpa Translocation Plan') - Pre-clearance survey reports A review of pre-clearance survey reports was undertaken covering clearing activities for the period December 2023 to May 2024. Further Cycas megacarpa specimens, additional to those identified in the pre-project baseline ecological surveys, were identified within the construction footprint during pre-clearance surveys undertaken in: - January 2024 - March 2024 - May 2024 While >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting.	<u>Pre-Clearance Survey Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024.	The Auditor is satisfied that no more than four (4) <i>Cycas megacarpa</i> individuals have been impacted. No Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting. This determination is based on a review of pre-clearance reports for the reporting period.	COMPLIANT

MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Approval from the minister has been sought for impacts to more the four <i>Cycas megacarpa</i> individuals.	Check for/review: - evidence of correspondence to DCCEEW - evidence of approval	Audit evidence reviewed and assessed to determine compliance with this condition included: - Threatened Species Impact and Translocation Management Plan (TSITMP) ('Cycas Megacarpa Translocation Plan') - Pre-clearance survey reports - Approval Holder requests to the Minister for approval to disturb >4 Cycas individuals - Minister approval to disturb >4 Cycas individuals. A TSITMP, (otherwise titled as the 'Cycas Megacarpa Translocation Plan'), was also produced (Greentape Solutions, June 2023) to satisfy Condition 3 of EPBC 2020/8773 in the event that more than four (4) <i>Cycas Megacarpa</i> individuals would be translocated, with this 'translocation plan' to be approved by the Minister if Condition 3 was triggered. A request to impact >4 Cycas individuals was submitted by the Approval Holder to the Minister on 11-JUL-2023. This request appears to have been pre-emptive, on the expectation that additional Cycas individuals would likely be discovered and potentially impacted during project development. While >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting.	<u>Pre-Clearance Surveys - Identification of Additional Cycas Individuals</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Evidence of Approval Holder Request to Impact >4 Cycas Individuals</u> [LETTER - PDF] Re: 2020/8773 Aldoga Solar Farm - Expansion Area Cycad clearance. Request for Minister approval to impact up to 20 Cycas megacarpa individuals. Letter from NGH Consulting (Dr Carissa Fee), dated 11-JUL-2023. <u>Evidence of Minister Approval to Impact >4 Cycas Individuals</u> [LETTER - PDF] Approval of the Offset Area Management Plans, Matters of National Environmental Significance Plan and request to impact up to 20 Cycas megacarpa, Aldoga Solar Farm Project, near Gladstone, QLD (EPBC 2020/8773). Letter from DCCEEW (Rachel Short), confirming OAMP and MNES Management Plan approval, dated 5-OCT-2023.	The Auditor is satisfied that: - further <i>Cycas megacarpa</i> individuals were identified during pre-clearance surveys, additional to the four (4) individuals identified in baseline ecological surveys - approval to disturb these additional individuals was obtained from the Minister. Notwithstanding, no Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting. This determination is based on: - a review of pre-clearance reports for the reporting period - record of written approval from the Minister.	COMPLIANT
s5.2 - S.M.A.R.T principles Measures in this MNES Plan have been developed in accordance with the S.M.A.R.T principles	Check for/review: MNES Management Plan	S.M.A.R.T principles are provided in Section 5.2 of the plan.	<u>MNES Management Plan</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023).	The Auditor is satisfied that mitigation measures in the MNES Management Plan have been developed in accordance with S.M.A.R.T principles. This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT
Measures developed for this MNES Plan are specific to the target MNES species and can be measured through ongoing monitoring programs	As per above	Information on the alignment of management measures to best-practices, standards and other scientific evidence are provided in Appendix E (MNES profiles) of the MNES Management Plan. This includes impact and management approaches for Koala, Greater Glider, Squatter Pigeon and Cycas megacarpa. The species-specific management approaches presented in these MNES profiles (Appendix E) are consistent with the management measures detailed in the main plan document.	As per above	The Auditor is satisfied that mitigation measures are species-specific and aligned with relevant, species-specific best-practices, standards and other scientific evidence. This determination is based on: - Auditor review of the MNES Management Plan - recognition of existing and prior approval of the plan by the Minister.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
s5.3 - Vehicle use Vehicles accessing and driving through the Project Area must not exceed a maximum speed limit of 50 km/hr	Check for/review: audit site inspection (evidence of speed limits)	A maximum project area speed limit of 40 km/hr has been established, including the main site access road from Gladstone Mount Larcom Road. Evidence of speed limit implementation was confirmed during the site inspection undertaken as part of this audit on 4-DEC-2024 (refer images).	<u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Visual sighting by Auditor of 40km/hr maximum speed limit, including the main site access road from Gladstone Mount Larcom Road, observation of speed limit compliance by project construction traffic.	The Auditor is satisfied that a maximum site speed limit of 40 km/hr has been implemented. This determination is based on Auditor visual observation.	COMPLIANT
Vehicle access will be restricted to existing access roads and tracks	Check for/review: - GIS maps of 'approved' roads and tracks - Audit site inspection (visual observation of site controls – e.g. site access control, fencing)	Evidence of site vehicle and access control considered by the Auditor included: - spatial mapping (indicating project area delineation and fencing), and on-site visual inspection of the Auditor (4-DEC-2024) - Audit site inspection (observation of controlled site access (gatehouse) and project area fencing/delineation to restrict vehicle access to project-controlled areas and exclude members of the public. Spatial figures reviewed indicate that the approved EPBC development footprint areas (per Appendix A to EPBC 2020/8773), and hence the construction footprint, have incorporated and utilised existing (pre-project) access roads and tracks. This includes Flynn Rd, which is a public road and currently serves as the primary project access road connecting to Gladstone Mount Larcom Rd.	<u>Spatial Figures</u> [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Visual sighting by Auditor of controlled site access (gatehouse) and project area fencing/delineation to restrict vehicle access to project-controlled areas and exclude members of the public.	The Auditor is satisfied that vehicle access and movement is being controlled and contained to the approved project area and development footprint. This determination is based on: - spatial data - Auditor visual observation.	COMPLIANT
Refuelling of any vehicle on Site is to occur greater than 50 m from any waterway, retained habitat, and/or riparian zone	Check for/review: - Spatial maps and data (infrastructure layout) - audit site inspection.	Evidence of refuelling facility siting, and fuel and chemical storage bunding and containment, were evaluated through: - review of spatial figures (infrastructure layout) - review of the project Construction Environmental Management Plan (CEMP) - site observation during the audit site inspection conducted on 4-DEC-2024. Evidence of refuelling facility siting, and fuel and chemical storage bunding and containment, were evaluated through review of spatial figures. Mapping indicates all facilities were sited within EPBC approved development footprint areas and > 50m from watercourses/riparian zones. No refuelling or chemical storage facilities were observed by the Auditor to be in proximity watercourses/riparian zones during the audit site inspection completed on 4-DEC-2024.	<u>Construction Environmental Management Plan (CEMP)</u> [PLAN] ADSF-AEA-ENV-PLA-0005 r02 - Construction Environmental Management Plan - Aldoga Solar Farm, Rev 2, dated 29-APR-2024. <u>Spatial Figures</u> [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint, including compounds/yards. [SPATIAL MAP] ADSF Fuel and Chemical Storage. GIS Figure, un-dated. Figure showing location of laydown areas, fuel and chemical storage facilities relative to watercourses and riparian zones. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group).	The Auditor is satisfied that refuelling facilities and refuelling activities are not undertaken within 50m of a watercourses and riparian zones. This determination is based on: - spatial figures (location of fixed refuelling points) - Auditor visual observation.	COMPLIANT

MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
A register of Squatter Pigeon sighting will be maintained and used to inform personnel of potential fauna collision areas that have a higher risk of vehicle collision risk	Check for/review: Fauna sighting records	Evidence of Squatter Pigeon sightings was confirmed through review of the ADSF MNES Animal Register, which recorded Squatter Pigeon sightings for between 2-FEB-2024 and 16-OCT-2024.	Evidence of Squatter Pigeon Sightings Register [REGISTER] ADSF MNES Animal Register. Register of MNES fauna sightings including Squatter Pigeon observations (un-dated PDF document). Register of MNES fauna sightings for the period 14-OCT-2023 to 16-OCT-2024.	The Auditor is satisfied that a register of Squatter Pigeon sightings is in place and sightings are being recorded. This is based on Auditor review of the Project Fauna sightings register where Squatter Pigeon sightings during the reporting period were recorded.	COMPLIANT
Legible warning signs will be placed on all tracks that intersect locations in which Squatter Pigeon has been identified within the project area	Check for/review: Audit site inspection (visual observation of awareness signage)	Evidence of the installation of Squatter Pigeon awareness signage was confirmed during the site inspection undertaken as part of this audit on 4-DEC-2024 (refer images).	Independent Audit - Site Inspection [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Visual sighting by Auditor of Squatter Pigeon awareness signage in several locations across the project area.	The Auditor is satisfied that Squatter Pigeon awareness signage has been installed. This determination is based on Auditor visual observation.	COMPLIANT
s5.4 - Avoid and minimise impacts s5.4.1 - Final detailed design and micro-siting The following mitigation measures will be implemented for the detailed design, including roads, underground cabling and other infrastructure, to reduce or avoid ecological impacts: Minimising clearing within the riparian vegetation community (which also incorporates core Greater Glider habitat)	Check for/review: - design layout plans and vegetation mapping overlays - review of as-cleared survey records - evidence of construction design to avoid or minimise EPBC MNES impacts - site inspection (observation of riparian corridor avoidance)	Audit evidence reviewed and assessed to determine compliance with this condition included: - representative records indicating construction design and planning to avoid impacts on EPBC habitat and riparian zones - spatial maps - visual site inspection. The representative evidence reviewed indicates that the construction design process included consideration of EPBC- and other environmental matters. This is supported by spatial mapping and visual observations during the audit which show that vegetation with riparian zones (i.e. along watercourses and natural drainage lines) has been largely avoided and retained, other than points where these features are intersected by access roads, tracks and other linear disturbance	Evidence of MNES Management Inputs to Construction Design [MS EXCEL WORKSHEET] EXTEMAIL-ADSF-EXTEMAIL-AEA-DES-000001.00-Aldoga Design Inputs - Appendix J 20230824. Notes provision of EPBC footprint to inform construction layouts @ 30% design stage. Un-dated file. [EMAIL] ADSF Flynn Road Electrical Crossing. Acciona (Lachlan Cooksey) to Cecil Riley (Acciona), dated 9-OCT-2023, 11:40PM. Request to alter Flynn Road trench crossing design to minimise tree and vegetation clearance. Spatial Data and Maps [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. Independent Audit - Site Inspection [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). General site inspection and observations.	The Auditor is satisfied that vegetation clearing within riparian zones has been avoided or minimised as far as reasonably practicable. This determination is based on: - representative records indicating construction design and planning to avoid impacts on EPBC habitat and riparian zones - spatial maps - visual site inspection.	COMPLIANT

MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Minimising clearing within high value Greater Glider habitat (mixed eucalypt woodland)	Check for/review: - design layout plans and vegetation mapping overlays - review of as-cleared survey records - evidence of construction design to avoid or minimise EPBC MNES impacts	Audit evidence reviewed and assessed to determine compliance with this condition included a review of spatial maps and data, showing approved clearing extents and as-cleared ground. Spatial records reviewed indicate that habitat clearing limits for Greater Glider have been maintained, with 202 Ha of Greater Glider habitat cleared, less than the 258.77 Ha approved.	<u>Evidence of MNES Management Inputs to Construction Design and Planning</u> [MS EXCEL WORKSHEET] EXTEMAIL-ADSF-EXTEMAIL-AEA-DES-000001.00-Aldoga Design Inputs - Appendix J 20230824. Notes provision of EPBC footprint to inform construction layouts @ 30% design stage. [EMAIL] ADSF Flynn Road Electrical Crossing. Acciona (Lachlan Cooksey) to Cecil Riley (Acciona), dated 9-OCT-2023, 11:40PM. Request to alter Flynn Road trench crossing design to minimise tree and vegetation clearance. <u>Spatial Data and Maps</u> [SPATIAL MAP] Figure (un-dated) - ADSF Greater Glider Habitat. Figure showing mapped Greater Gliding Habitat extent and reconciliation of habitat area approved for clearing (258.77 Ha) versus total habitat area cleared (202 Ha).	The Auditor is satisfied that: - no more than 258.77 of Greater Glider habitat has been cleared - that total clearing of Greater Glider habitat was less than approved (202 Ha actual vs 258.77 Ha approved) This determination is based on spatial data and maps comparing approved clearing extents versus actual clearance.	COMPLIANT
Final detailed design of road and overhead powerline alignments to minimise the overall Development Footprint to the greatest extent feasible, whilst also reducing the overall loss of Koala and Greater Glider habitat	As per above	Audit evidence reviewed and assessed to determine compliance with this condition included a review of spatial maps and data, showing approved clearing extents and as-cleared ground. Spatial records reviewed indicate that: - habitat clearing limits for Koala have been maintained, with 212 Ha of Koala habitat cleared, less than the 269.72 Ha approved - habitat clearing limits for Greater Glider have been maintained, with 202 Ha of Greater Glider habitat cleared, less than the 258.77 Ha approved.	<u>Spatial Data and Maps</u> [SPATIAL MAP] GIS Figure (un-dated) - ADSF Koala Habitat. Figure showing mapped Koala Habitat extent, and reconciliation of habitat area approved for clearing (269.72 Ha) versus total habitat area cleared (212 Ha). [SPATIAL MAP] Figure (un-dated) - ADSF Greater Glider Habitat. Figure showing mapped Greater Gliding Habitat extent and reconciliation of habitat area approved for clearing (258.77 Ha) versus total habitat area cleared (202 Ha).	The Auditor is satisfied that: - no more than 258.77 of Greater Glider habitat has been cleared, with total Greater Glider habitat clearance of 202 Ha - no more than 269.72 of Koala habitat has been cleared, with total Koala habitat clearance of 212 Ha. This determination is based on spatial data and maps comparing approved clearing extents versus actual clearance.	COMPLIANT
Micro-siting infrastructure to avoid <i>Cycas megacarpa</i> (or translocate in advance)	Check for/review: - pre-clearance survey reports - fauna spotter reports - spatial data	Audit evidence reviewed and assessed to determine compliance with this condition included representative records indicating construction design and planning to avoid impacts on identified <i>Cycas megacarpa</i> individuals. Evidence reviewed indicates that although >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no <i>Cycas</i> relocations were required as these were either located outside the development footprint area or avoided through micro-siting.	<u>Evidence of MNES Management Inputs to Construction Design and Planning</u> [EMAIL] <i>Cycas Megacarpa</i> Locations - To Be Flagged. Acciona (Meagan Kay) to Jeffrey Hilder (Acciona), dated 22-FEB-2024. Notification of requirement to avoid disturbance to identified <i>Cycas megacarpa</i> individuals. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Inspection of <i>Cycas</i> translocation recipient site.	The Auditor is satisfied that project design and construction has considered impacts to <i>Cycas megacarpa</i> . No <i>Cycas</i> relocations were required as these were either located outside the development footprint area or avoided through micro-siting. This determination is based on a review of: - pre-clearance survey reports - fauna spotter reports.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Micro-siting infrastructure to minimise the number of hollow bearing trees cleared	Check for/review: - pre-clearance survey reports - fauna spotter reports - spatial data	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial data - pre-clearance surveys and fauna spotter catcher reports (identification of hollows and suitability for salvage) - representative records indicating construction design and planning to avoid impacts on hollow-bearing trees (HBTs). The identification of potential habitat features (including hollows) and their suitability for salvage and re-use was undertaken as part of pre-clearance surveys and during clearing activities, as documented in fauna spotter catcher reports, with the suitability of habitat features at the discretion of the ecologists deployed for these surveys. A review of pre-clearance surveys and fauna spotter catcher reports notes that no hollows suitable for redeployment as Greater Glider hollows were identified in trees cleared during project construction. As per Section 6.1 of the MNES Management Plan, nest boxes may be utilised in lieu of salvaged hollows. No records were sighted identifying the need for micro-siting of infrastructure to avoid hollow bearing trees. A review of sample internal environmental disturbance permits notes that in several instances, HBTs in proximity to approved vegetation clearances were identified and communicated to site personnel.	<u>Evidence of Greater Glider Hollow Identification and Suitability Assessment</u> [SPATIAL MAP] Figure - ADSF Rev.1- Greater Holder. Figure showing suitable hollows for salvage within the EPBC-approved clearing area. [PDF REPORT] Memo - Aldoga Solar Farm BESS Geotech Pre-Clearance Survey Results, Feb 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 9-FEB-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. <u>Evidence of Hollow Bearing Tree Avoidance</u> [INTERNAL CLEARING PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-05 - Clear and grub substation bench area within Lot 2.	The Auditor is satisfied that: - potential HBTs (hollows) were identified as part pre-clearing surveys and fauna spotter assessments during clearing activities - none were identified as suitable as Greater Glider Habitat. This determination is based on a review of: - spatial data and mapping - pre-clearance and fauna spotter reports.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
s5.5 - Weed and pest management; pre-, during, and post clearing s5.5.1 - Weed management Mitigation measures for managing weeds on Site include: - Managing existing weeds on Site, including: - appropriate treatment of each species of weed taking into account protection of remaining native vegetation	Check for/review: - records of weed identification and monitoring - records of weed control	Audit evidence reviewed and assessed to determine compliance with this condition included: - pre-clearance survey reports - spatial figures (weed locations) - Aldoga Solar Farm Biosecurity Management Plan - internal inspection records - internal environmental disturbance permits. Evidence reviewed indicates that weed identification was undertaken extensively as part of baseline ecological surveys (used to inform the Biosecurity Management Plan), during pre-clearance surveys and internal environmental inspections. Weeds identified within target clearing areas were treated primarily by spraying or mechanical removal through cutting, slashing and earthmoving as part of overarching vegetation clearing activities. Approval Holder advice (Lachlan Cooksey, pers. Comm) indicates that removed weeds were disposed via burial within previously excavated borrow pits outside the project area, but within the broader Aldoga Solar Farm area. Evidence of weed management planning and treatment were observed in the form of internal toolbox meeting records and internal environmental disturbance permits. Based on representative evidence reviewed the Auditor is satisfied that weed identification and treatment was undertaken during the reporting period consistent with this commitment.	Evidence of Weed Identification and Monitoring [PDF REPORT] Memo - Aldoga Solar Farm BESS Geotech Pre-Clearance Survey Results, Feb 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 9-FEB-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [SPATIAL MAP] Figure – Aldoga Solar Farm – Identified WoNS (dated 20-MAR-2024, 10:36AM). Figure showing areas of identified WoNS within the project area (e.g. Lantana) and borrow pit locations for backfilling of cleared weeds. [SPATIAL MAP] Figure – Aldoga Solar Farm – Pre-Clearance Survey Progress (dated 13-MAY-2024). Figure showing locations of weeds within the project area identified during progressive pre-clearance surveys. [PLAN] Acciona Biosecurity Management Plan - Aldoga Solar Farm, revision 2, dated 15-APR-2024. Internal environmental management plan specifying management measures and responsibilities for the management of weeds and feral animals during the project construction phase. [REGISTER] ADSF - Flora and Fauna Register - Pest Extract. Weed Register (un-dated PDF document). [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Inspection ID INS.0000045691 (01-DEC-2024): Lot 2 fence line inspection. Evidence of Weed Treatment [PDF DOCUMENT] Loftus Toolbox Meeting Record, dated 21-MAR-2024. Record of weed removal and disposal to borrow pit. [PDF DOCUMENT] Dundrum Toolbox Meeting Record, dated 5-MAY-2024. Record of weed removal and disposal to borrow pit. [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive information on identified weeds and conditions for weed treatment.	The Auditor is satisfied that weed identification and treatment was undertaken during the reporting period consistent with this commitment. This determination is based on review of: - pre-clearance survey reports - internal inspection records - internal weed management planning records.	COMPLIANT
disposal of removed weeds	As per above	As per above	As per above	As per above	COMPLIANT
Weed hygiene protocols including:					



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
– developing a procedure for ensuring vehicles and machinery are weed free prior to entry to the site	Check for/review: • weed / biosecurity procedures • hygiene inspection records	Audit evidence reviewed and assessed to determine compliance with this condition included: • Acciona Biosecurity Management Plan - Aldoga Solar Farm, Rev 2, dated 15-APR-2024 • Example plant and vehicle hygiene inspections. Based on this evidence, the Auditor is satisfied that procedures and protocols for managing vehicle and machinery weed hygiene have been developed and are being implemented.	<u>Evidence of Weed Hygiene Protocols</u> [REGISTER] ADSF - Flora and Fauna Register - Pest Extract. Pest Animal Register (un-dated PDF document). Register of pest animal sightings for the period 4-DEC-2023 to 21-OCT-2024. [PLAN] Acciona Biosecurity Management Plan - Aldoga Solar Farm, revision 2, dated 15-APR-2024. Internal environmental management plan specifying management measures and responsibilities for the management of weeds and feral animals during the project construction phase. [REGISTER - EXTRACT] Mobile plant and equipment register tracking completion of in-bound plant and vehicle hygiene inspection and clearance. [PROJECT FORM] Weed hygiene declaration. Approval Holder internal weed hygiene declaration form (dated 10-JUN-2024) for importation of thermal sand, completed by Rockhampton Sands (material supplier). [PROJECT FORM] Weed hygiene declaration. Approval Holder internal weed hygiene declaration form (dated 8-JUL-2024) for inbound forklift, completed by All Lift Forklifts (equipment supplier or contractor).	The Auditor is satisfied that procedures and protocols for managing vehicle and machinery weed hygiene were developed implemented during the reporting period. This determination is based on a review of: • Biosecurity management plans • vehicle hygiene inspection records	COMPLIANT
– procedures for importing fill (if needed) to ensure it is weed free	As per above	Audit evidence reviewed and assessed to determine compliance with this condition included: • Acciona Biosecurity Management Plan - Aldoga Solar Farm, Rev 2, dated 15-APR-2024 • Example material import hygiene inspections/clearance. Based on this evidence, the Auditor is satisfied that procedures and protocols for managing weed risk in imported construction fill material have been developed and were implemented during the reporting period.	<u>Evidence of Weed Hygiene Protocols</u> [PLAN] Acciona Biosecurity Management Plan - Aldoga Solar Farm, revision 2, dated 15-APR-2024. Internal environmental management plan specifying management measures and responsibilities for the management of weeds and feral animals during the project construction phase. <u>Evidence of Hygiene Compliance</u> [PROJECT FORM] Weed hygiene declaration. Approval Holder internal weed hygiene declaration form (dated 10-JUN-2024) for importation of thermal sand, completed by Rockhampton Sands (material supplier).	The Auditor is satisfied that procedures and protocols for ensuring the hygiene of imported fill developed implemented during the reporting period. This determination is based on a review of: • Biosecurity management plans • imported fill hygiene inspection records.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
– exclusion of staff, machinery and vehicles in native vegetation areas	Check for/review: • visual observation (i.e. fencing and signage) • induction/training records addressing 'no go' areas	Evidence of site vehicle and access control considered by the Auditor included spatial mapping (indicating project area delineation and fencing), and on-site visual inspection of the Auditor (4-DEC-2024), which included observation of controlled site access (gatehouse) and project area fencing/delineation to restrict access to project-controlled areas and access into vegetation areas. Based on this evidence, the Auditor is satisfied that systems and measures to exclude personnel, machinery and vehicles into native vegetation areas are in place.	<u>Spatial Figures</u> [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Representative visual inspection of several cleared areas and in-field delineation of clearing limit boundaries. <u>Aldoga Solar Farm Induction and Induction Records</u> [POWERPOINT FILE - PDF] Aldoga Solar Farm Site-Specific Induction (un-dated file). Sample of completed induction training records also reviewed (evidence of induction delivery). Induction includes EPBC, MNES and general environmental requirements on Slides 30-40 inclusive.	The Auditor is satisfied that systems and measures to exclude personnel, machinery and vehicles into native vegetation areas are in place. This determination is based on: • review of the project site induction (communication of MNES management requirements) • Auditor observation of site access controls	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Ongoing weed monitoring and control	Check for/review: - records of weed identification and monitoring - records of weed control	Audit evidence reviewed and assessed to determine compliance with this condition included: - pre-clearance survey reports - spatial figures (weed locations) - Aldoga Solar Farm Biosecurity Management Plan - internal inspection records - internal environmental disturbance permits. Evidence reviewed indicates that weed identification was undertaken extensively as part of baseline ecological surveys (used to inform the Biosecurity Management Plan), during pre-clearance surveys and internal environmental inspections. Weeds identified within target clearing areas were treated primarily by spraying or mechanical removal through cutting, slashing and earthmoving as part of overarching vegetation clearing activities. Approval Holder advice (Lachlan Cooksey, pers. Comm) indicates that removed weeds were disposed via burial within previously excavated borrow pits outside the project area, but within the broader Aldoga Solar Farm area. Evidence of weed management planning and treatment were observed in the form of internal toolbox meeting records and internal environmental disturbance permits. Based on representative evidence reviewed the Auditor is satisfied that weed identification and treatment was undertaken during the reporting period consistent with this commitment. Notwithstanding, given insufficient evidence the Auditor is unable to make a positive determination that ongoing weed monitoring and control activities were undertaken during the reporting period.	<u>Evidence of Weed Identification and Monitoring</u> [PDF REPORT] Memo - Aldoga Solar Farm BESS Geotech Pre-Clearance Survey Results, Feb 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 9-FEB-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [SPATIAL MAP] Figure – Aldoga Solar Farm – Identified WoNS (dated 20-MAR-2024, 10:36AM). Figure showing areas of identified WoNS within the project area (e.g. Lantana) and borrow pit locations for backfilling of cleared weeds. [SPATIAL MAP] Figure – Aldoga Solar Farm – Pre-Clearance Survey Progress (dated 13-MAY-2024). Figure showing locations of weeds within the project area identified during progressive pre-clearance surveys. [PLAN] Acciona Biosecurity Management Plan - Aldoga Solar Farm, revision 2, dated 15-APR-2024. Internal environmental management plan specifying management measures and responsibilities for the management of weeds and feral animals during the project construction phase. [REGISTER] ADSF - Flora and Fauna Register - Pest Extract. Weed Register (un-dated PDF document). [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Inspection ID INS.0000045691 (01-DEC-2024): Lot 2 fence line inspection. <u>Evidence of Weed Treatment</u> [PDF DOCUMENT] Loftus Toolbox Meeting Record, dated 21-MAR-2024. Record of weed removal and disposal to borrow pit. [PDF DOCUMENT] Dundrum Toolbox Meeting Record, dated 5-MAY-2024. Record of weed removal and disposal to borrow pit. [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive information on identified weeds and conditions for weed treatment.	The Auditor is satisfied that weed identification and treatment was undertaken during the reporting period consistent with this commitment. This determination is based on review of: - pre-clearance survey reports - internal inspection records - internal weed management planning records.	COMPLIANT

MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
s5.4 - Weed and pest management; pre-, during, and post clearing s5.5.2 - Feral animal control The measures that will be implemented in the Project Area (if deemed necessary to protect MNES) include but are not limited to:					
Shooting – Feral pig (<i>Sus scrofa</i>), European Rabbit (<i>Oryctolagus cuniculus</i>), Feral cat (<i>Felis catus</i>), Wild Dog (<i>Canis familiaris</i>)	Check for/review: pest animal control records	Evidence of feral animal control considered by the Auditor included: - pest animal sighting registers - pest animal control registers There were no records of feral animal shooting activities during the reporting period.	Evidence of Pest Animal Monitoring and Control [REGISTER] ADSF - Flora and Fauna Register - Pest Extract. Pest Animal Register (un-dated PDF document). Register of pest animal sightings for the period 4-DEC-2023 to 21-OCT-2024.	Not applicable. No pest animal shooting was undertaken during the reporting period	NOT APPLICABLE
Trapping – Feral pig (<i>Sus scrofa</i>), European Rabbit (<i>Oryctolagus cuniculus</i>), Feral cat (<i>Felis catus</i>), Wild Dog (<i>Canis familiaris</i>)	As per above	As per above There were no records of pest animal trapping during the reporting period.	As per above	Not applicable. No pest animal trapping was undertaken during the reporting period	NOT APPLICABLE
Baiting – Feral pig (<i>Sus scrofa</i>), European Rabbit (<i>Oryctolagus cuniculus</i>), Feral cat (<i>Felis catus</i>), Wild Dog (<i>Canis familiaris</i>)	As per above	As per above There were no records of pest animal baiting programs during the reporting period.	As per above	Not applicable. No pest animal trapping was undertaken during the reporting period	NOT APPLICABLE
s5.6 - Pre-clearance management actions Prior to clearing a stage, the following assessment will be undertaken:					
Identify on-site areas where clearing, earthworks and/or alterations to a waterway corridor (i.e., construction of bridges, culverts, etc) will be required	Check for/review: - project schedules - work plans	Evidence of staged vegetation clearing and ground disturbance considered by the Auditor included project schedules and clearing plans (actions registers). These showed evidence of iterative site development, and location-specific work sequencing and planning for vegetation clearing and grubbing. Based on this evidence, the Auditor is satisfied that the staged vegetation clearing, and ground disturbance was undertaken during the reporting period, implemented through project schedules and area work plans.	Evidence of Vegetation Clearing Staging and Planning [PDF DOCUMENT] PV ALDOGA (389.2 MWn - 486.8MWp) Clear & Grub - Baseline Schedule. Project Plant Gantt Chart containing planned schedule for vegetation clearing and grubbing for the project. [PDF DOCUMENT] File Name: Sequence of Works - Loftus_02 (un-dated). Extract - Clearing and Grubbing Sequencing Plan. List-based work plan showing sequence of clearing activities in the 'Loftus 2' development area over the period MAY-JULY 2024. Planning matters documented include requirements for ecological and archaeological pre-clearance surveys, issue of site disturbance (clearing) permits, issue of vegetation clearing models and management of cleared vegetation.	The Auditor is satisfied that the staged vegetation clearing and ground disturbance was undertaken during the reporting period. This determination is based on a review of: - project construction schedule - area stage work plans.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Complete a desktop due diligence to identify potential values and legislative triggers including ensuring clearing of remnant vegetation in accordance with the Conditions of Approval (CoA)	Check for/review: - staged clearing planning - pre-clearance surveys - construction planning records	Representative evidence of pre-clearing due diligence considered by the Auditor included Approval Holder internal environmental disturbance permits and pre-clearance survey reports. Pre-clearance survey reports reviewed by the Auditor included assessment of matters relevant to impacts on MNES (per the conditions of approval). Internal environmental disturbance permits consider impacts on MNES and other matters such as cultural heritage, and set conditions on clearing, weed management, clearing limits and other controls for discrete disturbance areas and clearing activities. Work planning records were also reviewed by the Auditor. These showed evidence of planning for ecological and archaeological pre-clearance surveys, issue of site disturbance (clearing) permits, issue of vegetation clearing models and management of cleared vegetation. Based on the evidence reviewed, the Auditor is satisfied that appropriate due diligence processes to identify and plan for impacts on environmental and other values are in place and were implemented during the reporting period.	<u>Construction Area Work Planning</u> [PDF DOCUMENT] File Name: Sequence of Works - Loftus_02 (un-dated). Extract - Clearing and Grubbing Sequencing Plan. List-based work plan showing sequence of clearing activities in the 'Loftus 2' development area over the period MAY-JULY 2024. Planning matters documented include requirements for ecological and archaeological pre-clearance surveys, issue of site disturbance (clearing) permits, issue of vegetation clearing models and management of cleared vegetation. [MS EXCEL WORKSHEET] EXTEMAIL-ADSF-EXTEMAIL-AEA-DES-000001.00-Aldoga Design Inputs - Appendix J 20230824. Planning register shows identification and planning of matters to be resolved prior to clearing works including Cultural Heritage Assessment, Bushfire Assessment, Other Environmental Assessments and issue of Environmental permits. <u>Pre-Clearance Surveys</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Evidence of Vegetation Clearing Control</u> [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive conditions on clearing, weed management, clearing limits and other controls.	The Auditor is satisfied that appropriate due diligence processes to identify and plan for impacts on environmental and other values are in place and were implemented during the reporting period. This determination is based on a review of: - pre-clearance survey reports - area stage work plans. - internal environmental disturbance permits	COMPLIANT
Pre-clearance survey must be undertaken prior to clearing (see below).	Check for/review: pre-clearance surveys	The Audit included a review of several pre-clearance survey reports, covering vegetation clearance activities between January 2024 and May 2024. Based on this review, the Auditor is satisfied that pre-clearance surveys were undertaken in the reporting period.	<u>Pre-Clearance Surveys</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024.	The Auditor is satisfied that pre-clearance surveys were undertaken during the reporting period. This determination is based on a review of pre-clearance survey reports prepared during the reporting period.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.6.1 - Delineating the clearing boundary All plant operators will have access to spatial data for the vegetation clearing boundary, to be provided by the Principal upon request	Check for: provision of spatial data/maps	Audit evidence included a review of sample Acciona Internal Environmental Disturbance Permits. These permits address/include: - spatial figures delineation approved clearing extents - mandatory field-level controls to delineate associated clearing limits - mandatory field-level controls to avoid or mitigate direct and indirect environmental impacts. Documents reviewed indicate that clearing limits were maintained, including: - provision of clearing limit models to clearing and earthworks contractors - provision of internal ground disturbance permits to clearing and earthworks contractors - implementation of in-field demarcation as visual cues for clearing limits Based on the representative evidence reviewed, the Auditor is satisfied that the Approval Holder has maintained and communicated clearing limits during the construction phase, including provision of spatial data and maps to contractors.	<u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive conditions on clearing, weed management, clearing limits and other controls. [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-05 - Clear and grub substation bench area within Lot 2. <u>Evidence of Provision of Clearing Boundary Data and Extents</u> [DOCUMENT TRANSMITTAL] Transmittal No. ADSF-AEA-000875. Subject: Dundrums - Clearing Boundary Model (Issued for Use). Transmittal of clearing boundary model. from Acciona Energia to Dundrum Civil Pty Ltd, dated 4-OCT-2024, 10:05 AM AEST.	The Auditor is satisfied that spatial information is provided to machine operators involved in vegetation clearing. This determination is based on: - evidence of spatial data provision to the principal contractor - internal environmental disturbance permits.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Physical demarcation (e.g., pegging, temporary fencing or similar) to delineate the clearing area, especially in areas of dense vegetation or other high-risk areas (such as within riparian vegetation).	Check for/review: - evidence of fencing - use of survey markers and flagging	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial maps and data, showing approved clearing extents and as-cleared ground. - the Approval Holder Incident Management System ('Enablon') and sample of environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024). - site inspection of several disturbance areas to assess implementation of ground-level controls to preserve clearing limits. Spatial records reviewed indicate that clearing areas and limits match the approved project footprint areas per Attachment A to EPBC 2020/8773. Visual observations during the audit site inspection also confirmed the implementation of ground-level controls to delineate clearing limits including survey markers and flagging tape.	<u>Spatial Data and Maps</u> [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. <u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive conditions on clearing, weed management, clearing limits and other controls. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Representative visual inspection of several cleared areas and in-field delineation of clearing limit boundaries. <u>Acciona Incident Management System</u> [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that physical delineation of clearing boundaries was implemented for clearing activities undertaken during the reporting period. This determination is based on: - review of the spatial/GIS records - Auditor site inspection.	COMPLIANT
All areas outside of the approved Development Footprint are to be designated as no-go areas and protected as follows: - Surveyor's pegs with brightly coloured flagging (or equivalent) will delineate the clearing boundary. - Trees will be felled away from retained vegetation, to ensure retained vegetation is not damaged.	As per above	As per above	As per above	As per above	COMPLIANT

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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.6.2 - Pre-clearance surveys Prior to clearing works commencing, vegetation to be cleared will be inspected by an ecologist and/or suitably qualified fauna spotter	Check for/review: - pre-clearance reports - fauna spotter reports	Audit evidence reviewed and assessed to determine compliance with this commitment included a review of pre-clearance survey reports and fauna spotter reports prepared during the reporting period. Based on this review, and review of academic qualifications for a sample of named fauna spotters, the Auditor is satisfied that suitably qualified ecologists and/or fauna spotter catchers were utilised to survey vegetation earmarked for clearing prior to, and during, clearing works during the reporting period.	Pre-Clearance Surveys [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. Fauna Spotter Reports [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona.	The Auditor is satisfied that suitably qualified ecologists and/or fauna spotter catchers were utilised to survey vegetation earmarked for clearing prior to, and during, clearing works. This determination is based on Auditor review of: - pre-clearance survey reports - fauna spotter reports.	COMPLIANT
The fauna spotter for each Contractor will: - undertake a pre-clearance survey of vegetation within the clearing boundary of the Contractor's respective scope of work, within one month prior to clearing - supervise clearing activities.	As per above	As per above	As per above	The Auditor is satisfied that suitably qualified ecologists and/or fauna spotter catchers were utilised to survey vegetation earmarked for clearing prior to, and during, clearing works. This determination is based on Auditor review of fauna spotter reports prepared during the reporting period.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
The pre-clearance survey will identify and protected matters within the vicinity of the clearing within the project area. The pre-clearance survey will record and mark the following: • presence of fauna and/or fauna habitat • threatened flora (Cycas megacarpa) • WoNS • evidence of pest animal species • denning / nesting / roosting features • habitat features	As per above	Pre-clearance survey reports prepared during the reporting period were reviewed to evaluate compliance with this commitment. All reports reviewed included reference to a survey scope consistent with this commitment, covering identification of potential nesting, roosting and denning habitat features. This included: • hollow bearing trees and stags • large fallen logs and branches • bird nests • complex rock fissures • boulder piles • dams • flowing watercourses • burrows • presence of Weeds of National Significance (WoNS) • presence of Cycas megacarpa Based on the reports reviewed, the Auditor is satisfied that the pre-clearance surveys undertaken and prepared during the reporting period satisfied this commitment.	Pre-Clearance Surveys [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024.	The Auditor is satisfied that the pre-clearance surveys undertaken and prepared during the reporting period satisfied this commitment, including assessment of: • potential nesting, roosting and denning habitat features • presence of Cycas megacarpa • presence of WoNs. This determination is based on Auditor review of pre-clearance survey reports prepared during the reporting period.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
If any other threatened species under EPBC Act are identified throughout the Project, DCCEEW will be notified and consulted on any requirement for an amendment to the MNES Plan.	Check for/review: - pre-clearance reports - fauna spotter reports - Approval holder notifications to the Department (if applicable)	Not applicable (not triggered). Audit evidence reviewed and assessed to determine compliance with this commitment included a review of pre-clearance survey reports prepared during the reporting period. No other threatened species under EPBC Act were identified in these pre-clearing surveys. Accordingly, there are no records of Approval Holder communication to the Department (DCCEEW) of such occurrences.	<u>Pre-Clearance Surveys</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona.	Not applicable (not triggered). The Auditor is satisfied that no other threatened species under EPBC Act were identified during pre-clearing surveys undertaken during the reporting period.	NOT APPLICABLE

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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.6.3 - Protected plants The Project includes areas which are shown as high risk on the Protected Plants Flora Survey Trigger Map (DES, 2019). Pre-clearance surveys in these areas will follow the pre-translocation assessment process in the Cycad Translocation Plan, which is an EPBC CoA.	Check for/review: - pre-clearance survey reports - alignment with prescribed translocation methodology	Audit evidence reviewed and assessed to determine compliance included: - Pre-clearance survey reports - Cycas Megacarpa Translocation Plan and Cycas megacarpa translocation procedure. A review of pre-clearance survey reports was undertaken covering clearing activities for the period December 2023 to May 2024. Further <i>Cycas megacarpa</i> individuals, additional to those identified in the pre-project baseline ecological surveys, were identified within the construction footprint during pre-clearance surveys undertaken in: - January 2024 - March 2024 - May 2024 Evidence reviewed indicates that although >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting.	Pre-Clearance Surveys [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results – Geotech within EPBC area LCA-1 to LCA-9, December 2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 6-DEC-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. Management Plans [PLAN] Threatened Species Impact and Translocation Management Plan ('Cycas Megacarpa Translocation Plan') - Aldoga Solar Farm Expansion Area (version B2.2, 28-JUN-2023). [PROCEDURE] Cycas megacarpa translocation procedure. Prepared by Attexo Group Pty Ltd. 10-APR-2024.	The Auditor is satisfied that the pre-clearance survey for <i>Cycas megacarpa</i> individuals was undertaken in accordance with the Cycas Megacarpa Translocation Plan. Notwithstanding, no Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting. This determination is based on Auditor review of pre-clearance survey reports prepared during the reporting period.	COMPLIANT
Surveys will be done by qualified ecologists and may be combined with pre-clearance surveys.	Check for/review: - pre-clearance survey reports - use of suitably qualified ecologists	A sample of pre-clearance survey reports prepared during the reporting period were reviewed to evaluate compliance with this commitment. The surveys were undertaken by Rhys Sharry and Kye Chamberlain, consulting ecologists from Attexo Group Pty Ltd. The pre-clearance survey reports reviewed included surveys for protected plants, primarily focussed on <i>Cycas megacarpa</i>. Based on the reports reviewed, the Auditor is satisfied that pre-clearance surveys were undertaken by qualified ecologists and included survey and identification of protected plants.	Pre-Clearance Surveys [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results – Geotech within EPBC area LCA-1 to LCA-9, December 2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 6-DEC-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. Evidence of Fauna Spotter Catcher Qualifications [CURRICULA VITAE] Rhys Sharry - Ecologist. [CURRICULA VITAE] Kye Chamberlain - Ecologist.	The Auditor is satisfied that pre-clearance surveys were undertaken by qualified ecologists and included survey and identification of protected plants. This determination is based on Auditor review of pre-clearance survey reports prepared during the reporting period.	COMPLIANT

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Areas will be surveyed approximately four weeks prior to clearing (or earlier where practicable)	Check for/review: pre-clearance survey reports	Audit evidence reviewed and assessed to determine compliance included: - pre-clearance survey reports - project staged clearing schedule. The timing between pre-clearance surveys and staged clearing events could not be readily determined by the Auditor. However, the Auditor is satisfied that pre-clearance surveys were undertaken during the reporting period ahead of scheduled vegetation clearing activities consistent with the intent of this commitment and conditions of approval.	Pre-Clearance Surveys [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. Vegetation Clearing Schedule [PDF DOCUMENT] PV ALDOGA (389.2 MWn - 486.8MWp) Clear & Grub - Baseline Schedule. Project Plant Gantt Chart containing planned schedule for vegetation clearing and grubbing for the project.	The Auditor is satisfied that the pre-clearing surveys were undertaken during the reporting period and ahead of scheduled vegetation clearing activities. This determination is based on Auditor review of: - pre-clearance survey reports prepared during the reporting period - the project construction and vegetation clearing schedule.	COMPLIANT
This data will be collated into a database in an appropriate format (e.g., GIS Esri Shapefile, MS Excel spreadsheet or MS Access database).	Check for/review: - spatial data management systems - document management systems	Audit evidence reviewed and assessed to determine compliance with this condition included visual observation of the Approval Holder's GIS spatial data management system during the audit site inspection undertaken on 4-DEC-2024. This spatial data system is used to record all relevant environmental survey data and records for the project including the locations of identified <i>Cycas megacarpa</i> individuals.	Independent Audit - Site Inspection [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of Approval Holder spatial data management system.	The Auditor is satisfied that the appropriate database systems are in place to manage and maintain ecological records, including locations of <i>Cycas megacarpa</i> individuals within the project area. This determination is based on Auditor review of Approval Holder spatial data and document management systems.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Cycads which are identified in the Project Area, but that are going to be avoided will be demarcated and signage will be erected notifying all personnel that those plants are not to be interfered with.	Check for/review: - communication of Cycas locations - evidence of protection and signage (if applicable) - spatial data (identified Cycas locations)	Audit evidence reviewed and assessed to determine compliance with this condition included: - a review of representative records indicating construction design and planning to avoid impacts on identified <i>Cycas megacarpa</i> individuals - pre-clearance survey reports - photo-point records - internal environmental disturbance permits - audit site inspection. The representative evidence reviewed indicates that the construction design process included communication of and planning for avoidance of <i>Cycas megacarpa</i> locations. Review of pre-clearance survey reports indicates that although >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no Cycas relocations were required as these were either located outside the development footprint area or avoided through micro-siting. Visual observation of cycad locations was made by the Auditor during the audit site inspection undertaken on 4-DEC-2024. This included in-situ, undisturbed Cycas individuals. The Auditor confirms that avoided (undisturbed) Cycas were fenced and demarcated by survey pegs and flagging.	<u>Evidence of MNES Management Inputs to Construction Design and Planning</u> [EMAIL] Cycas Megacarpa Locations - To Be Flagged. Acciona (Meagan Kay) to Jeffrey Hilder (Acciona), dated 22-FEB-2024. Notification of requirement to avoid disturbance to identified Cycas megacarpa individuals. [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive conditions on clearing, weed management, clearing limits and other controls. <u>Pre-Clearance Surveys</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of several <i>Cycas megacarpa</i> individuals within the project area, including avoided individuals.	The Auditor is satisfied that <i>Cycas megacarpa</i> individuals within the project area that have been avoided (undisturbed) through project design have been fenced or otherwise demarcated. This determination is based on Auditor review of: - the project construction and vegetation clearing schedule - spatial data - pre-clearance survey reports prepared during the reporting period - photo evidence - internal environmental disturbance permits identifying Cycas locations for avoidance.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
If any additional EPBC Act listed threatened plant species are found within the Project Area, DCCEEW will be notified, and appropriate action determined in consultation with the Department prior to clearing commencing	Check for/review: - pre-clearance reports - fauna spotter reports - Approval holder notifications to the Department (if applicable)	Not applicable (not triggered). Audit evidence reviewed and assessed to determine compliance with this commitment included a review of pre-clearance survey and fauna spotter catcher reports prepared during the reporting period. These reports do not document any instances of other EPBC-listed threatened plant species being identified in areas earmarked for clearing. Accordingly, there are no records of Approval Holder communication to the Department (DCCEEW) of such occurrences.	<u>Pre-Clearance Surveys</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results – Geotech within EPBC area LCA-1 to LCA-9, December 2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 6-DEC-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona.	Not applicable (not triggered). The Auditor is satisfied that no other EPBC-listed threatened plant species were identified during pre-clearing surveys undertaken during the reporting period.	NOT APPLICABLE



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7 - Vegetation clearing management actions 5.7.1 - Timing Clearing and bulk earthworks will be avoided during and immediately following heavy rainfall events to protect soils and vegetation at the Site	Check for/review: - project schedules - clearing schedules	Audit evidence reviewed and assessed to determine compliance with this commitment included: - Project clearing, grubbing and earthworks schedule (baseline - planned) - Project clearing, grubbing and earthworks schedule (actual) The dry season in the Gladstone region is generally between June to September, though can extend from March to October. The project schedules reviewed indicate that clearing, grubbing and earthworks were proposed for March/April 2024, though were completed mostly between March through July 2024, with some final works completed in September 2024. No specific records were available as evidence of clearing and earthworks management around discrete weather events during the reporting period. However, the Auditor is satisfied that clearing, grubbing and earthworks were appropriately planned to minimise weather-related risks.	<u>Evidence of Vegetation Clearing Staging and Planning</u> [PDF DOCUMENT] PV ALDOGA (389.2 MWn - 486.8MWp) Clear & Grub - Baseline Schedule. Project Gantt Chart containing planned (baseline) schedule for vegetation clearing, grubbing and earthworks. [PDF DOCUMENT] PV ALDOGA (389.2 MWn - 486.8MWp) Clear & Grub - Baseline Schedule vs Actual Schedule. Project Gantt Chart containing planned schedule vs actual timing of vegetation clearing, grubbing and earthworks.	Based on evidence reviewed, the Auditor is satisfied that clearing, grubbing and earthworks activities works were appropriately planned to minimise weather-related risks. This determination is based on Auditor review of project construction and vegetation clearing schedules.	COMPLIANT
If undertaking nightworks, lights will be directed away from vegetation/habitat areas and shielded/baffled to limit light spill	Check for/review: CEMPs addressing working hours	Not applicable (not triggered). The Project construction has been undertaken exclusively during daylight hours (6.30 am to 6.30 pm). Therefore, no practical requirement has existed for lighting fixtures, including use of shields and baffles to limit light spill beyond work areas.	<u>Construction Environmental Management Plan (CEMP)</u> [PLAN] ADSF-AEA-ENV-PLA-0005 r02 - Construction Environmental Management Plan - Aldoga Solar Farm, Rev 2, dated 29-APR-2024.	Not applicable (not triggered). Project construction has been undertaken exclusively during daylight hours (6.30 am to 6.30 pm). No requirement to mitigate lighting impacts has therefore applied.	NOT APPLICABLE



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.2 - Fauna spotter activities A suitably qualified fauna spotter catcher will undertake a visual inspection of habitat features immediately prior to commencement of any clearing	Check for/review: - fauna spotter reports - fauna spotter curricula vitae (CVs)	Sample fauna spotter reports were reviewed to evaluate Approval Holder compliance with this commitment. These reports are considered to provide suitable evidence of compliance, including a comprehensive summary of: - fauna species encountered during vegetation clearing event - fauna individuals captured, relocated, injured or killed (including any individuals euthanized) - habitat features identified (if applicable). The surveys were undertaken by Rhys Sharry and Kye Chamberlain, consulting ecologists from Attexo Group Pty Ltd. Based on the reports reviewed, the Auditor is satisfied that suitably qualified fauna spotter catchers were engaged to supervise clearing activities, including the identification and inspection of potential habitat features prior to and during clearing works.	<u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona. <u>Evidence of Fauna Spotter Catcher Qualifications</u> [CURRICULA VITAE] Rhys Sharry - Ecologist. [CURRICULA VITAE] Kye Chamberlain - Ecologist.	The Auditor is satisfied that suitably qualified fauna spotter catchers were engaged to supervise clearing activities, including the identification and inspection of potential habitat features prior to and during clearing works. This determination is based on Auditor review of: - fauna spotter survey reports - fauna spotter curricula vitae (CVs)	COMPLIANT
The fauna spotter catcher will supervise all clearing activities and will have authority to cease clearing activities if protected matters could be impacted	As per above	As per above	As per above	As per above	COMPLIANT
Areas of Squatter Pigeon habitat will be flushed for Squatter Pigeon individuals immediately prior to clearing	As per above	As per above	As per above	As per above	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
The definition of suitably qualified fauna spotter catcher is outlined in Appendix D.1	Check for/review: - fauna spotter reports - fauna spotter curricula vitae (CVs)	Sample fauna spotter reports were reviewed to evaluate Approval Holder compliance with this commitment. The surveys were undertaken by Rhys Sharry and Kye Chamberlain, consulting ecologists from Attexo Group Pty Ltd as at the time the fauna spotter services were provided. Experience and qualifications of these persons relative to the criteria in Appendix D.1 in the MNES Management Plan are as follows: <u>Rhys Sharry</u> - Bachelor of Science (Zoology and Ecology) - Rabies Vaccinated - Experience in fauna survey; and the safe catch, handling, care and appropriately release fauna, including high-risk species such as bats and venomous snakes. <u>Kye Chamberlain</u> - BSc (Majors in Zoology & Ecology) - BSc Hons. in Zoology (Class I) - Experience with flora and fauna ecological survey. Based on available evidence, the Auditor is satisfied that suitably qualified fauna spotter catchers were engaged to supervise clearing activities in accordance with the definition of 'suitably qualified persons' per Appendix D.1 in the MNES Management Plan.	As per above	The Auditor is satisfied that suitably qualified fauna spotter catchers were engaged to supervise clearing activities in accordance with the definition of 'suitably qualified persons' per Appendix D.1 in the MNES Management Plan. This determination is based on Auditor review of: - fauna spotter survey reports - fauna spotter curricula vitae (CVs) - fauna spotter credentials against the criteria in Appendix D.1.	COMPLIANT
5.7.3 - Clearing approach A two-staged clearing process will be used, with ground, understory and shrub layers removed a minimum of 48 hours prior to tree felling	Check for/review: fauna spotter reports	Sample fauna spotter reports were reviewed to evaluate Approval Holder compliance with this commitment. Fauna spotter reports reviewed indicate adherence to a sequential clearing process. Though the reports do not provide timestamps or detail as to when different vegetation strata were cleared, they indicate that progressive clearing was undertaken over several days. Based on representative evidence, the Auditor is satisfied that sequential clearing activities were undertaken consistent with the intent of this commitment.	Fauna Spotter Reports [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona.	The Auditor is satisfied that sequential clearing activities were undertaken consistent with the intent of this commitment. This determination is based on Auditor review of fauna spotter survey reports prepared during the reporting period.	COMPLIANT
Trees will be progressively cleared to enable fauna residing in or near the clearing site the opportunity to vacate the clearing area	As per above	As per above	As per above	As per above	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.4 - Sensitive clearing technique A sensitive clearing technique will be implemented to fell HBTs, particularly in areas of mapped Greater Glider habitat: Hollow bearing trees will be felled in a manner which reduces potential for fauna mortality. Trees will be tapped/nudged gently with excavator head before felling to allow for fauna to self-relocate	Check for/review: - fauna spotter reports - clearing reports - incident records (fauna harm or death)	Audit evidence reviewed and assessed to determine compliance with this commitment included: - fauna spotter reports - Approval Holder incident management system (incident records) The fauna spotter reports reviewed do not provide detail on how trees were felled, though provide detail on the fauna species encountered during clearing activities and their fate, e.g.: - self-relocation from the clearing area - relocation by fauna spotter - individual euthanized due to harm/injury. Most fauna identified in the reports were observed to self-relocate from the clearing area. A limited number of fauna were euthanized due to injury (e.g. snakes, lizards and geckos). There were no recorded instances of harm, injury or relocation of threatened nocturnal species including Greater Glider.	<u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona. <u>Acciona Incident Management System</u> [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that: - vegetation clearing was undertaken in a manner aimed to minimise fauna harm - there were no recorded instances of harm, injury or relocation of threatened nocturnal species including Greater Glider. This determination is based on Auditor review of: - fauna spotter reports - incident records.	COMPLIANT
After felling, HBTs will be inspected by a fauna spotter to determine if any animals are present. Fauna spotters will capture and safely release any uninjured fauna present.	As per above	As per above	As per above	As per above	COMPLIANT

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Within areas of Greater Glider habitat clearing width for all new and existing road and track widths within the Project Area will not exceed 15 metres	Check for/review: - spatial figures (project layout showing access roads and tracks) - audit site inspection	Audit evidence reviewed and assessed to determine compliance with this commitment included: - spatial maps and data showing project disturbance footprint in relation to EPBC approval clearing limits - audit site inspection (observation of clearing relative to riparian zones). Based on a review of spatial data and visual observation, the Auditor is satisfied that roads and tracks widths were minimised during the construction phase, with the exception of Flynn Road, which is an existing public road and main access road, whose existing clearing width appeared in excess of 15m.	<u>Spatial Data and Maps</u> [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. [SPATIAL MAP] ADSF Photovoltaic Array Setout (un-dated). Figure showing PV construction configuration relative to EPBC clearing limits. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of access roads and tracks and construction.	The Auditor is satisfied that roads and tracks widths were minimised during the construction phase. This determination is based on: - Auditor review of project layout and designs, providing scale measurements of access road and track widths - Audit site inspection (visual observation of access roads and track configuration).	COMPLIANT
5.7.5 - Clearing Koala habitat Clearing of Koala habitat will be undertaken as follows: Sequential clearing to ensure Koalas in the clearing area have time to relocate of their own volition, including: - staged clearing such that no more than 3% of Koala habitat is cleared each day (stage). - ensuring that a gap of 12 hrs each day from 6pm-6am in which no Koala trees are cleared.	Check for/review: fauna spotter reports	Audit evidence reviewed and assessed to determine compliance with this commitment included: - fauna spotter reports. - spatial maps The fauna spotter reports reviewed indicated adherence to a staged clearing process, consistent with the intent of this commitment. Spatial figures reviewed indicate that the rate of Koala habitat daily clearing varied between 1.10% to 2.47%, below the 3% limit proposed in the MNES Management Plan. As addressed elsewhere in this audit, project construction was and is exclusively in daylight hours (between 6am and 6pm). Therefore, the Auditor is satisfied that the required 12-hour gap between daily clearing activities would have been met. The Auditor is satisfied that staged clearing of koala habitat was undertaken consistent with the intent of this commitment.	<u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona. <u>Evidence of Koala Habitat Daily Clearing Rate</u> [SPATIAL MAP] Figure – ADSF Koala Clearing Calcs (un-dated). Figure showing daily clearing rate (percentage) of Koala habitat in Construction Area K.	The Auditor is satisfied that: - staged clearing of koala habitat occurred - the rate of Koala habitat daily clearing did not exceed 3% - the required 12-hour gap between consecutive daily clearing activities was maintained. This determination is based on Auditor review of fauna spotter survey reports prepared during the reporting period.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Clearing is carried out in a way which maintains appropriate habitat links between the clearing areas and adjacent habitat to allow Koalas to self-disperse	As per above	Audit evidence reviewed and assessed to determine compliance with this commitment included a review of several fauna spotter records/reports. The fauna spotter reports reviewed did not provide detail on if and how habitat links were maintained during clearing activities to aid koala dispersion. However, the reports indicate adherence to a staged clearing process, consistent with the intent of this commitment.	As per above	The Auditor is satisfied that staged clearing of koala habitat occurred, consistent with the intent of this commitment. This determination is based on Auditor review of fauna spotter survey reports prepared during the reporting period.	COMPLIANT
No Koala 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	As per above	Audit evidence reviewed and assessed to determine compliance with this commitment included a review of several fauna spotter records/reports. These reports are considered to provide suitable evidence of compliance, including a comprehensive summary of fauna species encountered during vegetation clearing event, including those captured and relocated. No Koalas (<i>Phascolarctos cinereus</i>) were identified as present during any clearing events undertaken in the reporting period.	As per above	Not applicable (not triggered). The Auditor is satisfied that no Koalas were present during any clearing activities undertaken during the reporting period, and hence this management action was not triggered. This determination is based on Auditor review of fauna spotter survey reports prepared during the reporting period.	NOT APPLICABLE
A suitably qualified fauna spotter is to be present at all times to undertake a pre-clearance survey and to supervise clearing	Check for/review: - fauna spotter reports - fauna spotter curricula vitae (CVs)	Audit evidence reviewed and assessed to determine compliance with this condition included a review of several fauna spotter records/reports. Based on this review, and review of academic qualifications for a sample of named fauna spotters, the Auditor is satisfied that suitably qualified fauna spotter catchers were engaged to supervise clearing activities undertaken during the reporting period.	<u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona <u>Evidence of Fauna Spotter Catcher Qualifications</u> [CURRICULA VITAE] Rhys Sharry - Ecologist. [CURRICULA VITAE] Kye Chamberlain - Ecologist.	As per above	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.6 - Salvaging tree hollows – Greater Glider Salvaged tree hollows, or nest boxes (if required), will be installed in habitat suitable for Greater Glider outside of the Development Footprint	Check for/review: - fauna spotter reports - spatial data - evidence of hollow preservation/recovery/re-use (if applicable) - nest box installation (if applicable)	Audit evidence reviewed and assessed to determine compliance with this commitment included: - spatial data - pre-clearance surveys and fauna spotter catcher reports (identification of hollows and suitability for salvage) The identification of potential habitat features (including hollows) and their suitability for salvage and re-use was undertaken as part of pre-clearance surveys and during clearing activities, as documented in fauna spotter catcher reports, with the suitability of habitat features at the discretion of the ecologists deployed for these surveys. A review of pre-clearance surveys and fauna spotter catcher reports notes that no hollows suitable for redeployment as Greater Glider hollows were identified in trees cleared during project construction. As per Section 6.1 of the MNES Management Plan, nest boxes may be utilised in lieu of salvaged hollows. The Approval Holder indicated that no nest boxes were installed during the reporting period given no suitable natural hollows were identified/destroyed during clearing activities.	<u>Evidence of Greater Glider Hollow Identification and Suitability Assessment</u> [SPATIAL MAP] Figure - ADSF Rev.1- Greater Holder. Figure showing suitable hollows for salvage within the EPBC-approved clearing area. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona.	Not applicable (not triggered). The Auditor is satisfied that: - potential hollow bearing trees (hollows) were identified as part pre-clearing surveys and fauna spotter assessments during clearing activities - however, none were identified as suitable as Greater Glider Habitat and thus no hollows were required to be salvaged or substitute nest boxes deployed. This determination is based on Auditor review of fauna spotter survey reports prepared during the reporting period.	NOT APPLICABLE

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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Salvage and relocation of Greater Glider hollows must be undertaken in accordance with the following condition: <i>[summarised]</i> - all HBT hollows are inspected - actions taken to encourage fauna to vacate (e.g. tapping) - height, depth and orientation of hollows recorded prior to clearing - hollows are repaired/waterproofed/lined with nesting material prior to re-installation at the salvage site - recovered hollows/nest boxes installed with similar characteristics - hollow removal and re-installation by trained arborists - new host trees protected from ringbarking - location of all re-instated hollows / nest boxes GPS logged - re-instated hollows / boxes are monitored to detect Glider use	As per above	As per above	As per above	Not applicable (not triggered)	NOT APPLICABLE
Where substitute nest boxes are used, holes to be 90mm diameter with rear entrance	As per above	As per above	As per above	Not applicable (not triggered)	NOT APPLICABLE
5.7.7 - Glider pole installation – Greater Glider During construction within Greater Glider habitat, glider poles will be installed where the clearing widths of roads is such that distances between trees is greater than 15m	Check for/review: - spatial maps (pole locations) - photo point records - audit site inspection (visual observation of poles)	The installation of Greater Glider poles, and hence pole monitoring, has not yet been triggered. Advice from the Approval Holder (Lachlan Cooksey, pers. comm) indicates that pole installation is only relevant to construction area M02, however the installation of poles has not been approved by Powerlink QLD given the poles would be sited in a transmission line corridor and would be non-compliant with electrical energy offset limits. This matter is still subject to consultation between Acciona and Powerlink as at the date of audit.	Not applicable	Not applicable (not triggered)	NOT APPLICABLE



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Glider poles will be designed in accordance with best practice measures, including: - constructed from used electricity poles or salvaged tree trunks - Height no less than canopy height, with a minimum height of 12m. - not constructed where there is potential for conflict with powerlines etc - Horizontal crossbars located at various heights of the pole - Highest crossbar within 1m of the top of the pole and at least 11m above-ground. - The DBH of the poles is no less than 300 mm. - Distance between poles and suitable landing platforms on the opposite side of the road is no greater than 1.5 times the height of the pole and allows for a loss of glide elevation of 1m for every 1.8m of glide distance (i.e. allows for a fall of 8.5m if poles are located 15m apart). - Metal attached around poles to prevent Greater Glider from descending to the ground.	As per above	As per above	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
Remote cameras will be installed facing all Greater glider poles to monitor their use.	As per above	As per above	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
Monitoring of glider poles will be conducted passively through placement of motion-triggered cameras.	As per above	As per above	Not applicable	Not applicable (not triggered)	NOT APPLICABLE
Data from each camera will be checked monthly and reported in annul compliance records	As per above	As per above	Not applicable	Not applicable (not triggered)	NOT APPLICABLE



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.9 - Riparian zones The Project will ensure there is no clearance in riparian zones by: Project design that avoids riparian zones	Check for/review: - design layout plans and vegetation mapping overlays - site audit visual inspection of as-constructed project areas relative to mapped riparian areas	Audit evidence reviewed and assessed to determine compliance with this commitment included: - representative records indicating construction design and planning to avoid impacts on EPBC habitat and riparian zones - spatial maps - audit site inspection (observation of clearing relative to riparian zones) The representative evidence reviewed indicates that the construction design process included consideration of EPBC- and other environmental matters. This is supported by spatial mapping and visual observations during the audit which show that vegetation within riparian zones (i.e. along watercourses and natural drainage lines) has been avoided and retained, other than points where these features are intersected by access roads, tracks and other linear disturbance.	<u>Evidence of MNES Management Inputs to Construction Design</u> [MS EXCEL WORKSHEET] EXTEMAIL-ADSF-EXTEMAIL-AEA-DES-000001.00-Aldoga Design Inputs - Appendix J 20230824. Notes provision of EPBC footprint to inform construction layouts @ 30% design stage. Un-dated file. [EMAIL] ADSF Flynn Road Electrical Crossing. Acciona (Lachlan Cooksey) to Cecil Riley (Acciona), dated 9-OCT-2023, 11:40PM. Request to alter Flynn Road trench crossing design to minimise tree and vegetation clearance. <u>Spatial Data and Maps</u> [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). General site inspection and observations.	The Auditor is satisfied that vegetation clearing within riparian zones has been avoided or minimised. This determination is based on: - Auditor review of project layout plans - visual observation (observation of clearing relative to riparian zones)	COMPLIANT
Riparian zones are mapped and spatial data made available to clearing contractor for avoidance	Check for/confirm: provision of spatial data/maps	Audit evidence reviewed and assessed to determine compliance with this commitment included: - spatial maps - records indicating provision of spatial maps and data on clearing limits. Documents reviewed indicate that clearing limits were maintained, including: - provision of clearing limit models to clearing and earthworks contractors - provision of internal ground disturbance permits to clearing and earthworks contractors Based on the representative evidence reviewed, the Auditor is satisfied that the Approval Holder has maintained and communicated clearing limits during the construction phase, including provision of spatial data and maps to contractors.	<u>Evidence of Provision of Clearing Boundary Data and Extents</u> [DOCUMENT TRANSMITTAL] Transmittal No. ADSF-AEA-000875. Subject: Dundrums - Clearing Boundary Model (Issued for Use). Transmittal of clearing boundary model. from Acciona Energia to Dundrum Civil Pty Ltd, dated 4-OCT-2024, 10:05 AM AEST. <u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL GROUND DISTURBANCE PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10: Clear, Grub and Slashing of Area A, dated 4-APR-2024. Internal document authorising discrete area of proposed ground disturbance and clearing, inclusive conditions on clearing, weed management, clearing limits and other controls.	The Auditor is satisfied that spatial information is provided to machine operators involved in vegetation clearing. This determination is based on: - evidence of spatial data provision to the principal contractor - internal environmental disturbance permits.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
The extent of clearing will be clearly marked prior to construction to ensure no riparian zones will be cleared	Check for/review: - GIS data (land survey of as-cleared areas and recent aerial imagery) - audit site inspection (evidence of fencing, survey markers and flagging)	Audit evidence reviewed and assessed to determine compliance with this condition included: - spatial maps and data, showing approved clearing extents and as-cleared ground - site inspection of several disturbance areas to assess implementation of ground-level controls to delineate and preserve clearing limits. Spatial records reviewed indicate that clearing areas and limits match the approved project footprint areas per Attachment A to EPBC 2020/8773. Visual observations during the audit site inspection also confirmed the implementation of ground-level controls to delineate clearing limits including survey markers and flagging tape.	<u>Spatial Data and Maps</u> [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. [SPATIAL MAP] ADSF Photovoltaic Array Setout (un-dated). Figure showing PV construction configuration relative to EPBC clearing limits <u>Evidence of Vegetation Clearing Control / Adherence to Clearing Limits</u> [INTERNAL CLEARING PERMIT] Acciona Internal Environmental Disturbance Permit, Permit ID EDP-10 - Clear, Grub and Slashing of Area A, dated 4-APR-2024. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Representative visual inspection of several cleared areas and in-field delineation of clearing limit boundaries.	The Auditor is satisfied that physical delineation of clearing boundaries was implemented for clearing activities undertaken in the reporting period. This determination is based on: - review of the spatial/GIS records - review of internal environmental disturbance permits - Auditor site inspection.	COMPLIANT
To further prevent impacts to riparian zones, no refuelling will occur within 50m of any waterway, retained habitat or riparian zone/s	Check for/review: - Spatial maps and data (infrastructure layout) - audit site inspection.	Evidence of refuelling facility siting, and fuel and chemical storage bunding and containment, were evaluated through: - review of spatial figures (infrastructure layout) - review of the project Construction Environmental Management Plan (CEMP) - site observation during the audit site inspection conducted on 4-DEC-2024. Evidence of refuelling facility siting, and fuel and chemical storage bunding and containment, were evaluated through review of spatial figures. Mapping indicates all facilities were sited within EPBC approved development footprint areas and >50m from watercourses/riparian zones. No refuelling or chemical storage facilities were observed by the Auditor to be in proximity watercourses/riparian zones during the audit site inspection completed on 4-DEC-2024.	<u>Construction Environmental Management Plan (CEMP)</u> [PLAN] ADSF-AEA-ENV-PLA-0005 r02 - Construction Environmental Management Plan - Aldoga Solar Farm, Rev 2, dated 29-APR-2024. <u>Spatial Figures</u> [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure, dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint, including compounds/yards. [SPATIAL MAP] ADSF Fuel and Chemical Storage. GIS Figure, un-dated. Figure showing location of laydown areas, fuel and chemical storage facilities relative to watercourses and riparian zones. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group).	The Auditor is satisfied that refuelling facilities and refuelling activities are not undertaken within 50m of a watercourses and riparian zones. This determination is based on: - spatial figures (location of fixed refuelling points) - Auditor visual observation.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.10 Erosion and sediment control Prior to and during construction, the construction Contractors will implement erosion and sediment control procedures for their works as per the CEMP. These measures will include: Preparing erosion and sediment control measures prior to commencement of construction in an area.	Check for/review: - evidence of ESCPs / CEMPs addressing erosion - audit site inspection (visual observation of in-field ESC controls)	Audit evidence reviewed and assessed to determine compliance with this condition included: - Construction Environmental Management Plan (CEMP) - Concept Erosion and Sediment Control Plan (ESCP) - Technical Specification - Erosion and Sediment Control. The above plans and specification were prepared by SMEC Australia Pty Ltd as preliminary documents intended to guide the development of detailed ESCPs, to be prepared by the Approval Holders' appointed construction contractor. Representative evidence of erosion and sediment control implementation was observed by the Auditor during the site inspection completed on 4-DEC-2024. These included: - application of rock rip-rap along drainage features / areas subject to concentrated surface water flow - application of mulched vegetation to disturbed soil - hydroseeding of Flynn Road embankments following road upgrade and widening. Based on these observations, the Auditor is satisfied that erosion and sediment controls were and are being implemented. Based on this evidence, the Auditor is satisfied that the Approval Holder planned for and implemented erosion and sediment controls during the reporting period.	<u>Construction Environmental Management Plan (CEMP)</u> [PLAN] ADSF-AEA-ENV-PLA-0005 r02 - Construction Environmental Management Plan - Aldoga Solar Farm, Rev 2, dated 29-APR-2024. [PLAN] ADSF-SME-ERO-RPT-0012.B - Erosion and Sediment Control Plan - Aldoga Solar Farm, Rev B, dated 6-DEC-2023. Prepared by SMEC Australia Pty Ltd for Acciona Energia. [PLAN] ADSF-SME-EWK-SPC-0003.C - Technical Specification: Erosion and Sediment Control - Aldoga Solar Farm, Rev C, dated 6-DEC-2023. Prepared by SMEC Australia Pty Ltd for Acciona Energia. <u>Evidence of Erosion Control Implementation</u> [PHOTO] Photograph File Name TC_01395.JPG, dated 8-OCT-2024. Installation of rock rip-rap in reinstated watercourse/drainage line as erosion protection. [PHOTO] Photograph File Name 202404~2.JPG, dated 2-APR-2024. Revegetation of Flynn Rd embankment. [PHOTO] Photograph File Name TC_01374.JPG, dated 4-OCT-2024. Upgrade and reinstatement of internal access road, including installation of culverts, and shaping of downstream-side disturbance area. [PDF DOCUMENT] File Name: 2024.10.23 M02 Photo Set. Photo point record - photos of progressive rehabilitation works in construction area M02. Photos showing re-contouring of disturbed ground, installation of V-drains, topsoil reinstatement and installation of rip-rack rock cover. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of erosion and sediment control implementation.	The Auditor is satisfied that the Approval Holder planned for and implemented erosion and sediment controls during the reporting period. This determination is based on: - review of management plans specifying erosion and sediment control requirements - Auditor site inspection.	COMPLIANT
Installation of erosion and sedimentation controls.	As per above	As per above	As per above	As per above	COMPLIANT
Stabilising disturbed ground and exposed soils.	As per above	As per above	As per above	As per above	COMPLIANT



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Training all personnel on effective erosion and sediment control practice	Check for/review: - Site induction - ESC awareness training	Audit evidence reviewed and assessed to determine compliance with this commitment included a review of project site induction records. The ADSF Induction Presentation reviewed addresses erosion and sediment control on Slide #35 of the induction. Based on this review, the Auditor is satisfied that site personnel receive relevant training in erosion and sediment control practice.	<u>Aldoga Solar Farm Induction and Induction Records</u> [POWERPOINT FILE - PDF] Aldoga Solar Farm Site-Specific Induction (un-dated file). Induction includes erosion and sediment control requirements on Slide 35. [FORM] Aldoga Induction Record. Inductee: N. Kuwajima completed 4-JUN-2024. [FORM] Aldoga Induction Record. Inductee: A. Miller, completed 7-MAY-2024.	The Auditor is satisfied that site personnel receive relevant training in erosion and sediment control practice. This determination is based on Auditor review of the project site induction.	COMPLIANT
Designing works to minimise the extent and duration of disturbance	Check for/review: - staged rehabilitation plan and schedule - GIS data showing areas under rehabilitation or rehabilitated - Audit site inspection (observation of progressive rehabilitation)	Audit evidence reviewed and assessed to determine compliance with this condition included: - Project baseline rehabilitation schedule - Approval Holder photographs - progressive rehabilitation - Rehabilitation inspection records - Auditor site observation. A schedule for progressive rehabilitation is in place, with visual evidence of on-ground rehabilitation works confirmed through inspection records, photo-point records and Auditor visual observation undertaken on 4-DEC-2024. Representative rehabilitation works that were observed, which overlap with erosion and sediment control works, include: - upgrade and reinstatement of access roads at watercourse crossings - application of rock rip-rap along drainage features / areas subject to concentrated surface water flow - application of mulched vegetation to disturbed soil - hydro-seeding of Flynn Road embankments following road upgrade and widening. Based on these observations, the Auditor is satisfied that a schedule for progressive rehabilitation is in place with on-ground works undertaken during the reporting period.	<u>Approval Holder Rehabilitation Schedule</u> [PDF DOCUMENT] PV ALDOGA (389.2 MWn - 486.8MWp) Rehabilitation Schedule per Area - Baseline Schedule. Project Plant Gantt Chart containing planned schedule for progressive rehabilitation of temporary disturbance areas. <u>Rehabilitation Area Inspection Records</u> [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Proforma checklist covering general aspects of soil, water, air quality, waste management, fauna risk/harm, fire management and ground rehabilitation. Sample of completed checklists reviewed: - Inspection ID INS.0000044148 (20-NOV-2024): Culvert 11 Rehab Inspection - Inspection ID INS.0000044377 (20-NOV-2024): M02 Rehabilitation [PDF DOCUMENT] File Name: 2024.10.23 M02 Photo Set. Photo point record - photos of progressive rehabilitation works in construction area M02. Photos showing re-contouring of disturbed ground, installation of V-drains, topsoil reinstatement and installation of rip-rack rock cover. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of progressive rehabilitation of temporary disturbance areas.	The Auditor is satisfied that a schedule for progressive rehabilitation is in place with on-ground works undertaken during the reporting period. This determination is based on: - Auditor review of rehabilitation schedules and photographic records - Auditor site inspection.	COMPLIANT
Progressive rehabilitation	As per above	As per above	As per above	As per above	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Storage of fuels, chemicals, wastes and other potentially environmentally hazardous substances must be bunded or otherwise contained in areas away from waterways, retained habitat or riparian zone/s, with erosion and sediment controls in place to contain substances in situ in case of a spill	- Check for/review: - CEMPs addressing fuel, chemical and waste activities - Audit site inspection	Evidence of refuelling facility siting, and fuel and chemical storage bunding and containment, were evaluated through: - review of spatial figures (infrastructure layout) - review of the project Construction Environmental Management Plan (CEMP) - site observation during the audit site inspection conducted on 4-DEC-2024. Evidence of refuelling facility siting, and fuel and chemical storage bunding and containment, were evaluated through review of spatial figures. Mapping indicates all facilities were sited within EPBC approved development footprint areas and > 50m from watercourses/riparian zones. No refuelling or chemical storage facilities were observed by the Auditor to be in proximity watercourses/riparian zones during the audit site inspection completed on 4-DEC-2024.	<u>Construction Environmental Management Plan (CEMP)</u> [PLAN] ADSF-AEA-ENV-PLA-0005 r02 - Construction Environmental Management Plan - Aldoga Solar Farm, Rev 2, dated 29-APR-2024. <u>Spatial Figures</u> [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint, including compounds/yards. [SPATIAL MAP] ADSF Fuel and Chemical Storage. GIS Figure, un-dated. Figure showing location of laydown areas, fuel and chemical storage facilities relative to watercourses and riparian zones. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group).	The Auditor is satisfied that refuelling facilities and refuelling activities are not undertaken within 50m of a watercourses and riparian zones. This determination is based on: - spatial figures (location of fixed refuelling points) - Auditor visual observation.	COMPLIANT

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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.11 - Habitat features Smaller rocks and logs will be inspected by the fauna spotter during the pre-clearance survey. Larger rocks and logs will be rolled using the excavator to search for fauna	Check for/review: - pre-clearance survey reports - fauna spotter reports	Pre-clearance survey and fauna spotter reports prepared during the reporting period were reviewed to evaluate compliance with this commitment. All reports reviewed included reference to a survey scope consistent with this commitment, covering identification of potential nesting, roosting and denning habitat features. This included: - hollow bearing trees and stags - large fallen logs and branches - bird nests - complex rock fissures - boulder piles - dams - flowing watercourses - burrows - presence of Weeds of National Significance (WoNS) - presence of Cycas megacarpa Based on the reports reviewed, the Auditor is satisfied that the pre-clearance surveys undertaken and prepared during the reporting period satisfied this commitment.	Pre-Clearance Surveys [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. Fauna Spotter Reports [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona.	The Auditor is satisfied that the pre-clearance surveys undertaken and prepared during the reporting period included an assessment of potential nesting, roosting and denning habitat features. This determination is based on Auditor review of pre-clearance survey reports prepared during the reporting period.	COMPLIANT
Where the fauna spotter considers grass or soil stripping has an elevated risk of encountering fauna, the fauna spotter will follow the bulldozer or grader and capture and relocate any uncovered fauna	Check for/review: fauna spotter reports	Fauna spotter reports prepared during the reporting period were reviewed to evaluate compliance with this commitment. None of the reports reviewed documented instances where grass or soil stripping occurred and fauna spotter tracking to capture fauna occurred. However, the Auditor is satisfied that fauna spotters were engaged to supervise staged clearing activities, with a primary purpose of providing capture and care of fauna, consistent with the intent of this commitment.	As per above	The Auditor is satisfied that fauna spotters were engaged to supervise staged clearing activities, with a primary purpose of providing capture and care of fauna, consistent with the intent of this commitment. This determination is based on Auditor review of fauna spotter reports prepared during the reporting period.	COMPLIANT



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Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Cleared vegetation will be stockpiled along the edges of the disturbance footprint, or may be mulched	Check for/review: - fauna spotter reports - photographs - audit site inspection (observation of cleared vegetation management)	Audit evidence reviewed and assessed to determine compliance with this condition included: - photographs - audit site inspection (observation of preserved habitat features) Sections of cleared trees with smaller hollows were observed during the site inspection, placed on the ground at the edge of clearing areas to provide ground-level habitat. Mulched cleared vegetation was also observed during the site inspection, re-used as both erosion control and in progressive rehabilitation.	Approval Holder Photographs [PHOTO] Photograph File Name: 2024.04.04 - Civil - Area J - Clear and Grub - Loftus Hollow Log Retention.JPG. Photo of clearing limit delineation and flagging of retained habitat feature (section of a felled tree) as ground-level fauna habitat. Independent Audit - Site Inspection [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of retained wildlife corridor between Larcom Creek and Mount Larcom.	Based on evidence reviewed, the Auditor is satisfied that cleared vegetation was either stockpiled along the edges of the disturbance footprint or mulched. This determination is based on: - Auditor review of Approval Holder photographs - Auditor site inspection.	COMPLIANT
Certain habitat features (e.g. hollows) will be retained and relocated nearby as habitat for native fauna, if requested by the fauna spotter.	Check for/review: - pre-clearance survey reports - fauna spotter reports	Audit evidence reviewed and assessed to determine compliance with this condition included: - pre-clearance surveys and fauna spotter catcher reports (identification of hollows and suitability for salvage) - photographs - audit site inspection (observation of preserved habitat features) The identification of potential habitat features (including hollows) and their suitability for salvage and re-use was undertaken as part of pre-clearance surveys and during clearing activities, as documented in fauna spotter catcher reports, with the suitability of habitat features at the discretion of the ecologists deployed for these surveys. A review of fauna spotter catcher reports notes that no hollows suitable for redeployment as Greater Glider hollows were identified in trees cleared during project construction. As per Section 6.1 of the MNES Management Plan, nest boxes may be utilised in lieu of salvaged hollows. Sections of cleared trees with smaller hollows were observed during the site inspection, placed on the ground at the edge of clearing areas to provide ground-level habitat.	Approval Holder Photographs [PHOTO] Photograph File Name: 2024.04.04 - Civil - Area J - Clear and Grub - Loftus Hollow Log Retention.JPG. Photo of clearing limit delineation and flagging of retained habitat feature (section of a felled tree) as ground-level fauna habitat. Independent Audit - Site Inspection [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of retained habitat features, principally sections of tree trunk retained as ground-level fauna habitat.	The Auditor is satisfied that the pre-clearance surveys undertaken and prepared during the reporting period included an assessment of potential nesting, roosting and denning habitat features. This determination is based on Auditor review of pre-clearance survey reports prepared during the reporting period.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.12 - Wildlife corridors The Project will maintain wildlife corridors, habitat quality and habitat connectedness within the Project Area and Mount Larcom. This will be achieved by avoidance of the area through Project design.	Check for/review: - Spatial maps (project design layouts) - land title records showing corridor establishment	Audit evidence reviewed and assessed to determine compliance with this commitment included: - spatial maps and data showing wildlife corridor alignment - land tenure records indicating wildlife corridor establishment Spatial maps reviewed indicate that the wildlife corridor between Larcom Creek and Mount Larcom has been established and is allowed for within and avoided by the project development layout. Establishment of the wildlife corridor was also confirmed during the site inspection undertaken by the Auditor on 4-DEC-2024.	<u>Evidence of Wildlife Corridor Establishment</u> [SPATIAL MAP] Development Area Lease Plan - Alodga Solar Farm. GIS Figure dated 27-AUG-2024. Prepared by Acciona Energia. Figure showing Development Lease Area, inclusive wildlife corridor. [SPATIAL MAP] Functional Wildlife Corridor - Aldoga Solar Farm. GIS Figure dated 4-DEC-2024, 5:19:11PM. Figure showing alignment of wildlife corridor connecting Larcom Creek and Mount Larcom. [SPATIAL MAP] EPBC Map Habitat - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 7:02:06AM. Figure showing mapped MNES protected matters habitat (Koala, Squatter Pigeon and Greater Glider), clearing limits and construction footprint inclusive primary and secondary construction laydown areas. [SPATIAL MAP] EPBC Map General - Aldoga Solar Farm. GIS Figure dated 16-NOV-2024, 6:25:14AM. Figure showing EPBC clearing limits, clearing limit fencing (boundary delineation) and construction footprint. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Observation of retained wildlife corridor between Larcom Creek and Mount Larcom.	the Auditor is satisfied that the Larcom Creek to Mount Larcom wildlife corridor has been established and avoided by the project development layout. This determination is based on: - Auditor review of spatial mapping (project design layouts) - Auditor site inspection.	COMPLIANT

MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
The habitat quality will be maintained for the life of the approval. To include: - weed monitoring and control of listed weeds that threaten MNES - feral animal monitoring and control of listed pests that threaten MNES. - monitoring of glider poles and salvaged hollows if they are required to be installed - ongoing monitoring of the habitat condition for the life of the approval.	Check for/review: - environmental audits - habitat condition assessments - weed monitoring and control records - pest animal monitoring and control records	Audit evidence reviewed and assessed to determine compliance with this condition included: - pest species register - internal inspection records - wildlife corridor land management records Evidence of wildlife corridor monitoring (e.g. weed presence and abundance) was observed in the form of internal inspection records and the project site weed register. Evidence of wildlife corridor management was observed of an internal memorandum summarising the results of mechanical weed removal trial undertaken within the wildlife corridor. Monitoring of pest animals is recorded in the site pest animal sightings register, which includes the wildlife corridor. Records indicate low abundance of pest animals during the reporting period with no pest control undertaken. No glider poles were installed during the reporting period. No salvaged glider hollows or substitute nest boxes were installed during the reporting period. Based on the representative evidence reviewed, the Auditor is satisfied that the functional wildlife corridor between Larcom Creek and Mount Larcom was subject to monitoring and maintenance activities during the reporting period consistent with this commitment.	Evidence of Wildlife Corridor Monitoring [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Proforma checklist covering general aspects of soil, water, air quality, waste management, fauna risk/harm, fire management and ground rehabilitation. Sample of completed checklists reviewed: - Inspection ID INS.0000045693 (3-OCT-2024): Drone Compliance Checks. Evidence of inspection of weed presence in wildlife corridor. - Inspection ID INS.0000045333 (26-NOV-2024): Area J Clear and Grub Inspection. Evidence of inspection of weed presence in wildlife corridor. [REGISTER] ADSF - Flora and Fauna Register - Pest Extract. Weed Register (un-dated PDF document). Evidence of Wildlife Corridor Management [PDF DOCUMENT] Memorandum – Addition to Minor Works Proposal: Functional Wildlife Corridor Work (dated 3-OCT-2024). Record of mechanical weed removal trial within the wildlife corridor.	The Auditor is satisfied that the functional wildlife corridor was subject to monitoring and maintenance activities during the reporting period. This determination is based on review of: - internal monitoring and inspection records - internal land management records.	COMPLIANT
Monitoring of the remaining wildlife corridors and other MNES habitat (including cleared areas for Squatter Pigeon) will be undertaken during environmental audits, within: - the first within 3 months of construction commencing and then every 6 months thereafter during construction; and - annually during operations. Monitoring will be undertaken by the Principal contractor or a suitably qualified ecologist.	As per above	As per above	As per above	As per above	COMPLIANT

MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.13 - Injured fauna and wildlife caring Procedures for handling injured fauna are outlined in Appendix D. This involves the use of suitably qualified fauna spotter catchers, licensed wildlife carers, and veterinarians.	Check for/review: - fauna spotter reports - incident records	Audit evidence reviewed and assessed to determine compliance with this commitment included: - fauna spotter reports - Approval Holder incident management system (incident records) Based on this review, and review of academic qualifications for a sample of named fauna spotters, the Auditor is satisfied that suitably qualified ecologists and/or fauna spotter catchers were utilised to oversee vegetation clearing and the handling of fauna. Veterinary and wildlife carer providers are nominated in Appendix D.5 of the MNES Management Plan. However, there were no recorded instances of injured or orphaned fauna being handed to any external wildlife carers or veterinarians as a result of vegetation clearing or other project activities during the reporting period.	Fauna Spotter Reports [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona. Acciona Incident Management System [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that: - suitably qualified fauna spotter catchers were engaged to supervise clearing activities and handling of injured fauna - there were no recorded instances of injured or orphaned fauna being handed to any external wildlife carers or veterinarians as a result of vegetation clearing or other project activities during the reporting period. This determination is based on review of: - fauna spotter reports - incident records.	COMPLIANT
Licensed and qualified wildlife carers will be contacted at least two weeks before the commencement of clearing to prepare for a potential admission of injured/orphan fauna.	Check for/review: Records of contact with veterinary and wildlife carers	Veterinary and wildlife carer providers are nominated in Appendix D.5 of the MNES Management Plan. Advice from the Approval Holder (Lachlan Cooksey, pers. Comm) indicates that contractors engaged as fauna spotter catchers contacted nominated veterinary and wildlife carer providers prior to clearing works, and this was generally done verbally through phone calls or in-person visits to these providers. No written evidence of veterinary and wildlife carer contact was available; however, the Auditor is satisfied that the intent of this commitment was met during the reporting period. As per above, there were no recorded instances of injured or orphaned fauna being handed to any external wildlife carers or veterinarians as a result of vegetation clearing or other project activities during the reporting period.	As per above	As per above	COMPLIANT
Due to the need for bats to only be handled by people who are vaccinated for Australian Bat Lyssavirus, the ability of local wildlife carers and veterinarians to receive bats will be established by the fauna spotter consultancy prior to clearing commencing.	As per above	As per above.	As per above	As per above	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.14 - Captured threatened species If a nocturnal threatened species, other than a Greater Glider, is recovered, it will be promptly transported by the Fauna Spotter Catcher to a suitable location	Check for/review: - fauna spotter reports - incident records	Fauna spotter reports prepared during the reporting period were reviewed to evaluate compliance with this commitment. Fauna species encountered during clearing activities are recorded by scientific name and how fauna individuals were managed, including either: - self-relocation from the clearing area - relocation by the fauna spotter - ethanized due to harm/injury during clearing works. There were no recorded instances of harm, injury or relocation of any threatened nocturnal species (including Greater Glider) during clearing activities undertaken in the reporting period.	<u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona. <u>Acciona Incident Management System</u> [MANAGEMENT SYSTEM] Acciona Incident Management System, 'Enablon'. Visual review of recorded environmental-related incidents for the 12-month period preceding the audit site inspection date (4-DEC-2024).	The Auditor is satisfied that this commitment was met during the reporting period, with no instances of any injury, harm or relocation of threatened fauna species during vegetation clearing activities. This determination is based on review of: - fauna spotter reports - incident records.	COMPLIANT
If other threatened species are recovered during the pre-clearance or clearance stages, the clearing methodology will be modified to reduce potential risks	As per above	Fauna spotter reports prepared during the reporting period were reviewed to evaluate compliance with this commitment. No other EPBC-listed threatened species were encountered or recovered during clearing activities undertaken in the reporting period. On this basis this commitment was not applicable (not triggered) during the reporting period.	As per above	Not applicable (not triggered)	NOT APPLICABLE
In the unlikely event that a threatened species is orphaned or injured by clearing activities, it will be immediately transported to the nearest wildlife hospital for treatment	As per above	As per above	As per above	Not applicable (not triggered)	NOT APPLICABLE
Any injuries or deaths of threatened fauna species must be reported immediately to the Site Environmental Coordinator and recorded as an environmental incident	As per above	As per above	As per above	Not applicable (not triggered)	NOT APPLICABLE
DCCEEW will be notified of any death of a threatened fauna species listed under the EPBC Act within 2 business days of the incident. The incident will then be reported in writing to DCCEEW within 10 business days	As per above	As per above	As per above	Not applicable (not triggered)	NOT APPLICABLE



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.7.15 - Translocation of <i>Cycas megacarpa</i> Translocation will be undertaken in accordance with the Cycad Translocation Plan	Check for/review: - Translocation Management Plan - Cycad translocation records and reports - Cycad translocation monitoring records - Audit site inspection (observation of translocated <i>Cycas</i>)	Audit evidence reviewed and assessed to determine compliance with the described translocation methodology included: - Threatened Species Impact and Translocation Management Plan ('<i>Cycas Megacarpa</i> Translocation Plan') <i>Cycas megacarpa</i> translocation procedure. - Pre-clearance survey reports - Fauna spotter reports. Evidence reviewed indicates that although >4 <i>Cycas megacarpa</i> individuals have been collectively identified within the project area, no <i>Cycas</i> relocations were required as these were either located outside the development footprint area or avoided through micro-siting (i.e. this commitment was not triggered during the reporting period).	<u>Management Plans</u> [PLAN] MNES Management Plan - Aldoga Solar Farm. (version V2.3, 1-AUG-2023). [PLAN] Threatened Species Impact and Translocation Management Plan ('<i>Cycas Megacarpa</i> Translocation Plan') - Aldoga Solar Farm Expansion Area (version B2.2, 28-JUN-2023). [PROCEDURE] <i>Cycas megacarpa</i> translocation procedure. Prepared by Attexo Group Pty Ltd. 10-APR-2024. <u>Pre-Clearance Surveys</u> [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. <u>Fauna Spotter Reports</u> [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, Flynn Road, 6-NOV-2023 to 15-NOV-2023. Attexo Group Pty Ltd, report prepared for Acciona, dated 16-NOV-2023. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, January 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 31-JAN-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, 2-FEB-2024 to 3-MAR-2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 19-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Fauna Spotter Catcher, 1-9 March 2024. Attexo Group Pty Ltd, Report prepared for Acciona, dated 13-MAR-2024. [PDF REPORT] Memo - Aldoga Solar Farm Pre-Clearance Survey Results, May 2024. Attexo Group Pty Ltd, report prepared for Acciona, dated 8-MAY-2024. [PDF REPORT] Fauna Post Clearance Report, 4-JUL-2024 to 10-JUL-2024 (un-dated report). Fauna Spotters Australia. Report prepared for Acciona.	Not applicable (not triggered). No <i>Cycas</i> relocations were required as these were either located outside the development footprint area or avoided through micro-siting (i.e. this commitment was not triggered during the reporting period).	NOT APPLICABLE



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Translocation of the plants will be undertaken using the following methodology: <i>[summarised]</i> • Establish and maintain a 'Cycad Translocation Database' to record actions required for delivery of this Plan. The Database will record: – the chain of custody for plant salvaged and seeds collected – details of seed collection and propagation – details of translocation to recipient site and final location of translocated or propagated plants. • Site preparation will be undertaken prior to salvage • Mark each plant with metal tag with individual numbers and strong wire • Marker paint or fluorescent dye will be used to mark the north side of each plant • Clear the area surrounding the individual plants by hand • Trim fronds back to where the rachis is attached to the stems. • Spray trunks and around the crown area (not the crown itself) with an anti-transpirant • Mechanical removal will be undertaken where topography and soil allows • Large/heavy plants will be transported using a soft sling on a backhoe or excavator bucket and packed using rolls of hessian sacking or similar to avoid bruising • Any damaged roots will be trimmed with clean/sterile secateurs and fungicide powder applied	As per above	As per above	As per above	As per above	NOT APPLICABLE



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Actions undertaken prior to the translocation of individuals will include, at a minimum: - weed management and rehabilitation - if required, management of pest animals in the vicinity of the recipient site (including baiting, trapping or use of exclusion fencing) - firebreaks, if required and if beneficial - fencing of recipient site - suitable watering arrangements, e.g. installation of a water tank and watering system, and/or water cart access	Check for/review: - Translocation Management Plan - Cycad translocation records and reports - Cycad translocation monitoring records - Audit site inspection (observation of translocated Cycas)	As per above	As per above	As per above	NOT APPLICABLE



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.8 - Post-clearing management actions 5.8.1 - Rehabilitation and revegetation Undertake progressive rehabilitation of the disturbed ground no longer required for construction or operation	Check for/review: - staged rehabilitation plan and schedule - GIS data showing areas under rehabilitation or rehabilitated - Audit site inspection (observation of progressive rehabilitation)	Audit evidence reviewed and assessed to determine compliance with this condition included: - Project rehabilitation schedule - Approval Holder photographs - progressive rehabilitation - Rehabilitation inspection records - Auditor site observation (observation of progressive rehabilitation) A schedule for progressive rehabilitation is in place, with visual evidence of on-ground rehabilitation works confirmed through inspection records, photo-point records and Auditor visual observation undertaken on 4-DEC-2024. Representative photo point records and Auditor observation demonstrate that progressive rehabilitation was undertaken during the reporting period. This included: - reinstatement of disturbed watercourse crossings including road reconstruction, culvert installation, landform re-contouring and installation of topsoils and rip-rap rock protection - installation of vegetative cover on roadside embankments on Flynn Rd. - spreading of mulched cleared vegetation as soil cover - hydro-seeding of Flynn Road embankments following - road upgrade and widening. - application of mulched vegetation to disturbed soil. Based on the evidence reviewed the Auditor is satisfied that progressive rehabilitation of temporary construction areas was undertaken during the reporting period.	<u>Approval Holder Rehabilitation Schedule</u> [PDF DOCUMENT] PV ALDOGA (389.2 MWn - 486.8MWp) Rehabilitation Schedule per Area - Baseline Schedule. Project Plant Gantt Chart containing planned schedule for progressive rehabilitation of temporary disturbance areas. <u>Evidence of Progressive Rehabilitation</u> [PHOTO] Photograph File Name 202404~2.JPG, dated 2-APR-2024. Revegetation of Flynn Rd embankment. [PHOTO] Photograph File Name TC_01374.JPG, dated 4-OCT-2024. Upgrade and reinstatement of internal access road, including installation of culverts, and shaping of downstream-side disturbance area. [PHOTO] Photograph File Name TC_01395.JPG, dated 8-OCT-2024. Installation of rock rip-rap in reinstated watercourse/drainage line as erosion protection. [PDF DOCUMENT] File Name: 2024.10.23 M02 Photo Set. Photo point record - photos of progressive rehabilitation works in construction area M02. Photos showing re-contouring of disturbed ground, installation of V-drains, topsoil reinstatement and installation of rip-rack rock cover. <u>Independent Audit - Site Inspection</u> [SITE INSPECTION] Aldoga Solar Farm, Wednesday 4-DEC-2024. Site inspection by Independent Auditor (Nick Travers, Attexo Group). Auditor observation of progressive rehabilitation of temporary disturbance areas.	The Auditor is satisfied that a schedule for progressive rehabilitation is in place with on-ground works undertaken during the reporting period. This determination is based on: - Auditor review of the project rehabilitation schedule - Auditor review of photographic records - Auditor site inspection.	COMPLIANT
Rehabilitation of temporary disturbance areas to be undertaken within 2 months of the area no longer being in use for the Project	As per above	A review of the project rehabilitation schedule was undertaken to determine compliance with this commitment. The schedule breaks construction and rehabilitation planning by work area, with a default timeframe of fourteen (14) days completion of progressive rehabilitation following the end of construction activities, with an overall milestone for temporary areas rehabilitation to be completed by 26-MAR-2025. Based on this evidence, the Auditor is satisfied that the progressive rehabilitation of temporary disturbance areas is scheduled consistent with this 2-month target timeframe. This is supported by photo-point evidence and Auditor visual observation.	As per above	the Auditor is satisfied that the progressive rehabilitation of temporary disturbance areas is scheduled consistent with this 2-month target timeframe. This determination is based on: - Auditor review of the project rehabilitation schedule - Auditor review of photographic records - Auditor site inspection.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Remedial revegetation works will include the following: - scarification of subsoil - application of topsoil - re-seeding with temporary cover crops (where future disturbance is anticipated prior to establishing long-term vegetation cover) - seeding with appropriate longer-term vegetation cover (where deemed necessary).	As per above	Audit evidence reviewed and assessed to determine compliance with this commitment included: - photo-point records - audit site inspection (observation of progressive rehabilitation) Representative photo point records and Auditor observation demonstrate that progressive rehabilitation was undertaken during the reporting period. This included: - reinstatement of disturbed watercourse crossings including road reconstruction, culvert installation, landform re-contouring and installation of topsoils and rip-rap rock protection - installation of vegetative cover on roadside embankments on Flynn Rd. - spreading of mulched cleared vegetation as soil cover. Based on the evidence reviewed the Auditor is satisfied that progressive rehabilitation of temporary construction areas was undertaken during the reporting period.	As per above	the Auditor is satisfied that progressive, remedial rehabilitation of temporary construction areas was undertaken during the reporting period. This determination is based on: - Auditor review of the project rehabilitation schedule - Auditor review of photographic records - Auditor site inspection.	COMPLIANT
Monitoring (and maintenance) of rehabilitated areas will continue until the rehabilitation success criteria has been met, in consideration of the local environmental conditions	Check for/review: - Rehabilitation inspection reports - rehabilitation monitoring reports (e.g. LFA/EFA reports) - photo-point records	Audit evidence reviewed and assessed to determine compliance with this commitment included: - Approval Holder internal inspection records - inspection of rehabilitation areas - photo point records. As the project was still under construction at the time of audit, and progressive rehabilitation still being implemented, no evaluation of rehabilitation performance or trajectory against success criteria was available. The evidence reviewed demonstrates that inspection and monitoring of progressive rehabilitation areas was undertaken during the reporting period.	Rehabilitation Area Inspection Records [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Proforma checklist covering general aspects of soil, water, air quality, waste management, fauna risk/harm, fire management and ground rehabilitation. Sample of completed checklists reviewed: - Inspection ID INS.0000044148 (20-NOV-2024): Culvert 11 Rehab Inspection - Inspection ID INS.0000044377 (20-NOV-2024): M02 Rehabilitation [PDF DOCUMENT] File Name: 2024.10.23 M02 Photo Set. Photo point record - photos of progressive rehabilitation works in construction area M02. Photos showing re-contouring of disturbed ground, installation of V-drains, topsoil reinstatement and installation of rip-rack rock cover.	The Auditor is satisfied that inspection and monitoring of progressive rehabilitation areas was undertaken during the reporting period. This determination is based on Auditor review of rehabilitation area inspection records.	COMPLIANT
5.8.2 - Trenches Trenches will be backfilled within 48 hours to minimise potential fauna trapping. If trenches are left open for longer than a day, they will be inspected daily (early in the morning) and any trapped fauna will be removed.	Check for/review: - inspection reports - photo-point records	Audit evidence reviewed and assessed to determine compliance with this commitment included: - Approval Holder internal inspection records - inspection of trenching activities - Photo point records The evidence reviewed demonstrates that inspection and monitoring of active trenches was undertaken during the reporting period. Approval Holder conformance with the specified timeframes for open trenches could not be validated, however no open trenches were observed during the audit site inspection undertaken on 4-DEC-2024. Based on available evidence, the Auditor is satisfied that this commitment was met during the reporting period.	Example Trench Inspection Records [Inspection Proforma ID F01_P01_GAE08002 Environmental Inspection in Construction]. Proforma checklist covering general aspects of soil, water, air quality, waste management, fauna risk/harm, fire management and ground rehabilitation Inspection ID NS.0000044379 (5-NOV-2024): AEC Trench Inspection. [PDF DOCUMENT] Photo point record - photos of trench inspection, dated 18-OCT-2024.	The Auditor is satisfied that inspection and monitoring of trenches was undertaken during the reporting period. This determination is based on Auditor review of photo and inspection records.	COMPLIANT



MNES Management Plan Commitments – Audit Criteria, Methodology and Detailed Findings

Commitments	Auditor Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Ramps or ladders in the trenches will be placed when leaving trenches overnight to facilitate the escape of trapped fauna.	As per above	As per above	As per above	As per above	COMPLIANT
SECTION 6 – MONITORING AND REPORTING					
6.4 - Reporting Annual reports will be published on the project website within 60 business days following the end of the relevant 12-month period, in accordance with the relevant EPBC condition (CoA 29)	Check for/review: Annual reports	Not applicable (not yet triggered). Commencement of the Action commenced on 13-NOV-2023, with the first 12-month compliance reporting period effective from 13-NOV-2024. Per Condition 29(a) of the approval, the annual compliance report for the first reporting period (13-NOV-2023 to 13-NOV-2024) is not due for publication until 60 business days following the end of the reporting period, being 10-FEB-2025. This compliance report due date falls outside the audit reporting window. Notwithstanding, the Auditor sighted a draft-in-development Annual Compliance Report (un-published at the time of audit) as evidence of report preparation pending future lodgement.	<u>Evidence of Compliance Report Preparation</u> [DRAFT REPORT] Aldoga Solar Farm (EPBC 2-2/8773) - Annual Compliance Report Year 1, 13-NOV-2023 - 12-NOV-2024. Draft in development document (unpublished).	Not applicable (not yet triggered). The annual compliance report for this first reporting period (13-NOV-2023 to 13-NOV-2024) is not due for completion and publication until 10-FEB-2025.	NOT APPLICABLE
SECTION 7 – TRAINING					
7.2 - Training All personnel involved with the Project will receive relevant training to ensure they understand their responsibilities under this MNES Plan	Check for/review: Site induction	Audit evidence reviewed and assessed to determine compliance with this commitment included a review of project site induction records. Based on this review, the Auditor is satisfied that site personnel receive relevant training in MNES requirements.	<u>Aldoga Solar Farm Induction and Induction Records</u> [POWERPOINT FILE - PDF] Aldoga Solar Farm Site-Specific Induction (un-dated file). Induction includes EPBC, MNES and general environmental requirements on Slides 30-40 inclusive. [FORM] Aldoga Induction Record. Inductee: N. Kuwajima, completed 4-JUN-2024. [FORM] Aldoga Induction Record. Inductee: A. Miller, completed 7-MAY-2024.	Based on evidence reviewed, the Auditor is satisfied that site personnel receive relevant training in MNES requirements. This determination is based on Auditor review of the project site induction.	COMPLIANT



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Appendix A

Auditor Photographs



Plate A.1: Vegetation clearing delineation and fence installation with Greater Glider tags



Plate A.2: Retention of potential habitat features (log) at edge of clearing boundary



Plate A.3: Squatter Pigeon awareness signage



Plate A.4: *Cycas megacarpa* flagging