

A photograph of solar panels in a field, showing the grid lines of the panels and the perspective of the rows receding into the distance.

KARARA WIND FARM PROJECT (EPBC 2020/8755)
ANNUAL COMPLIANCE REPORT
3 AUGUST 2022 – 2 AUGUST 2023

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1. PURPOSE

This report provides the first compliance report required under the EPBC Act approval (EPBC 2020/8755), Condition 36, for the period between 3 August 2022 and 2 August 2023. This report has been prepared in accordance with the Annual Compliance Report Guidelines, Commonwealth of Australia 2014 (henceforth referred to as the Annual Compliance Report Guidelines) and includes:

- Project details as specified (Section 2 and Table 1).
- A description of works completed during the reporting period (Section 3).
- An assessment of compliance against conditions imposed by EPBC 2020/8755 (Table 2).
- A declaration of accuracy signed off by a representative of the approval holder (Section 5).

2. Project Details

The Karara Wind Farm (KWF) Project (The Project) involves the construction of a wind farm, including up to 20 wind turbines and associated ancillary infrastructure, within privately held agricultural land approximately 40 km south-west of Warwick. The Project was deemed a controlled action under *the Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 25 September 2020, due to the presence of listed threatened species and communities and listed migratory species in proximity to the wind farm. The Project was assessed by preliminary documentation and subsequently approved with conditions by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 7 March 2022. Commencement of the action in accordance with the EPBC Act approval occurred on 3 August 2022.

Table 1: Project Details

EPBC Reference	2020/8755
Project Name	Karara Wind Farm Project, 40km west of Warwick, Queensland
Approval holder	CleanCo Queensland Limited ABN 85 628 008 159
Approved Action	To construct and operate the Karara wind farm, including up to 20 wind turbines, ancillary infrastructure and associated infrastructure upgrades, 40 km west of Warwick, Queensland [See EPBC Act referral 2020/8755].
Person accepting responsibility for the report	Julie Whitmore
Reporting period of the report	3 August 2022 to 2 August 2023
Date of preparation of the report	28 September 2023

3. DESCRIPTION of activities

The action is in the construction phase comprising of vegetation clearing, civil works, construction of infrastructure and associated electrical works undertaken during the reporting period. Construction works are overseen by the approval holder, with Balance of Plant (BoP) works being undertaken by Acciona Construction (the BoP Contractor). The BoP work scope includes all civil and vegetation clearing works associated with the action, to which the bulk of construction related environmental aspects relate. At the end of the reporting period, primary vegetation clearing works had been completed.

Specifically, the following work was completed during the reporting period:

- Cultural Heritage Surveys and Monitoring
- Pre-clear surveys
- Vegetation Clearing
- Earthworks
- Establishment of temporary laydown area

4. Compliance Assessment

This compliance assessment has been developed to address requirements set out in Section 3.6 of the *Annual Compliance Report Guidelines*. Results of this assessment are provided in Table 2. Compliance designations applied for the assessment are as per Section 3.7 of the aforementioned standard, and are reproduced below:

1. **Compliant**: 'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
2. **Non-compliant**: A designation of 'non-compliance' should be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
3. **Not applicable**: A designation of 'not applicable' should be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

Table 2: Compliance Assessment

Condition		Compliance Designation	Evidence / Comments																		
Part A – Conditions Specific to the action																					
1	<p>Within the project area, the approval holder must not clear more than:</p> <ul style="list-style-type: none"> a. 0.62 ha of Regent Honeyeater habitat; b. 52.4 ha of Koala habitat; c. 52.4 ha of Grey-headed Flying-fox habitat; d. 13.13 ha of Greater Glider habitat; and e. 12.1 ha of Squatter Pigeon habitat. 	Compliant	<p>Spatial analysis was undertaken on high resolution imagery taken during LiDAR capture to determine the final disturbance footprint.</p> <p>Based on the findings, all clearance was within the stipulated thresholds:</p> <table border="1"> <thead> <tr> <th>MNES Species Habitat</th> <th>Permitted Clearance (ha)</th> <th>Actual Clearance (ha)</th> </tr> </thead> <tbody> <tr> <td>Regent Honeyeater</td> <td>0.62</td> <td>0 ha</td> </tr> <tr> <td>Koala</td> <td>52.4</td> <td>0 ha</td> </tr> <tr> <td>Grey-headed Flying-fox</td> <td>52.4</td> <td>0 ha</td> </tr> <tr> <td>Greater Glider</td> <td>13.13</td> <td>0 ha</td> </tr> <tr> <td>Squatter Pigeon</td> <td>12.1</td> <td>0 ha</td> </tr> </tbody> </table>	MNES Species Habitat	Permitted Clearance (ha)	Actual Clearance (ha)	Regent Honeyeater	0.62	0 ha	Koala	52.4	0 ha	Grey-headed Flying-fox	52.4	0 ha	Greater Glider	13.13	0 ha	Squatter Pigeon	12.1	0 ha
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2	The approval holder must not clear outside the project area.	Compliant	No clearing has occurred outside the project area.																		
Environmental offsets																					
3	To compensate for the total clearance of habitat for EPBC Act listed threatened species up to the limits as specified in condition 1, the approval holder must provide an environmental offset in accordance with the principles of the Environmental Offsets Policy to the satisfaction of the Minister.	Compliant	Environmental offsets delivery is progressing as described below.																		

Condition		Compliance Designation	Evidence / Comments
4	The approval holder must implement the Interim Offset Area Management Plan (IOAMP) upon the commencement of the action and until the Minister has approved an Offset Area Management Plan (OAMP).	Compliant	<ul style="list-style-type: none"> ▪ The IOAMP was developed prior to EPBC Act approval and has been implemented from commencement of the action. ▪ Studies to support the development of the OAMP to be undertaken in accordance with the IOAMP. As such, offset calculations and habitat quality scoring have been completed and presented in the draft OAMP submitted to DCCEEW for review (in accordance with requirements of Condition 5 below).
5	The approval holder must submit an OAMP prepared by a Suitably Qualified Ecologist to the department three months after the commencement of the action for the written approval of the Minister. The approval holder must not commission until the OAMP has been approved in writing by the Minister. The approval holder must implement the approved OAMP.	Non-compliant	<ul style="list-style-type: none"> ▪ The OAMP was not submitted to DCCEEW within 3 months of commencement of the action. ▪ The OAMP is being prepared by a Suitably Qualified Ecologist and will be submitted to the DCCEEW within the subsequent reporting period. ▪ This non-compliance is considered administrative and to have no significant impact on MNES as the action has not directly impacted MNES habitat (refer Condition 1 response). ▪ Commissioning will not occur until the final OAMP has been approved in writing
6	<p>The OAMP must include:</p> <ol style="list-style-type: none"> a summary of the residual impacts to protected matters that will be compensated for by the offset. This summary must include the area(s) of habitat for protected matters and its condition and quality at all impact sites which the particular offset is to address; a table of commitments made in the OAMP to achieve the ecological benefits for relevant protected matters, and a reference to where the commitments are detailed in the OAMP; a description of the offset site(s), including location, size, condition, environmental values present and surrounding land uses; 	Compliant	<ul style="list-style-type: none"> ▪ Each of these items will be addressed in the OAMP.

Condition	Compliance Designation	Evidence / Comments
<ul style="list-style-type: none"> d. baseline data, including results from field validation surveys, and quantifiable ecological data on site habitat quality, and other supporting evidence, that documents: <ul style="list-style-type: none"> i. that suitable habitat for each EPBC Act listed threatened species will be present within the offset site(s); ii. the quality and condition of habitat for each EPBC Act listed threatened species within the offset site(s); iii. the presence of Koala individuals within the offset site(s); iv. the presence of Greater Glider within the offset site(s) or within the home-range of Greater Glider in adjacent, connected Greater Glider habitat; and v. the nature and extent of any weeds and feral animals at the offset site(s). e. an assessment of site habitat quality for each habitat feature; f. details of how the offset site(s) will provide connectivity with habitat features outside the offset site/s and biodiversity corridors for each EPBC Act listed threatened species; g. maps and shapefiles that clearly define the location and boundaries of the offset site(s), accompanied by offset attributes; h. specific offset completion criteria derived from the site habitat quality scores to demonstrate the improvement in the quality of habitat for each EPBC Act listed threatened species within the offset site(s) over the period of effect of this approval to the satisfaction of the Minister; i. details of the management actions, and timeframes for implementation, to be undertaken to achieve the offset completion criteria, including but not limited to: <ul style="list-style-type: none"> i. control of grazing stock within the offset site(s); vi. control of grazing within riparian zones of the offset site(s); vii. establishment of the typical range of tree species native to the Nandewar Bioregion, in particular local Eucalyptus species; viii. measures to protect juvenile trees from grazing by native and invasive species; 		

Condition	Compliance Designation	Evidence / Comments
<ul style="list-style-type: none"> ix. weed and feral animal management; and x. a commitment to maintain or improve the key habitat features within the offset sites(s) for the duration of the approval. j. interim milestones that set targets at 5-yearly intervals for progress towards achieving the offset completion criteria; k. details of the nature, timing and frequency of monitoring to report progress against achieving the 5-yearly interim milestones and maintaining improvements of site habitat quality. The frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the environmental offset is likely to achieve those milestones in adequate time to implement all necessary corrective actions; l. timing for the submission of interim monitoring reports which provide evidence demonstrating whether the interim milestones and offset completion criteria are likely to be achieved and subsequently have been achieved; m. timing for the implementation of corrective actions if monitoring activities indicate the interim milestones are unlikely to be, or have not been, achieved; n. a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OAMP and timely achievement of the offset completion criteria, including a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix; o. evidence of how the management actions and corrective actions take into account relevant approved conservation advices and are consistent with relevant recovery plans and threat abatement plans and where applicable, other relevant documents; and p. details of the legal mechanism for securing the environmental offset, such that legal security remains in force over the offset site(s) for at least the period of effect of this approval. 		
7	Not applicable	Requirement not triggered; OAMP is yet to be approved.

Condition		Compliance Designation	Evidence / Comments
	The approved OAMP must be attached to the legal mechanism used to secure the environmental offset.		
8	The offset completion criteria as specified in the approved OAMP must be achieved within 20 years of the commencement of the action and then be maintained or exceeded for the duration of the approval. The approval holder must regularly analyse the results of monitoring so as to be able to anticipate any likely failure to achieve the interim milestones and completion criteria and, so as to avoid such failure, promptly propose improved or additional management measures and/or offset site(s) in one or more revised versions of the OAMP and seek Minister approval of any such revised OAMP.	Not applicable	Requirement not triggered; the offset criteria timeframe has not elapsed.
9	If the offset completion criteria specified in the approved OAMP are not met within 20 years of the commencement of the action, the approval holder must, within 10 business days of the 20th anniversary of the commencement of the action: <ul style="list-style-type: none"> a. notify the department which offset completion criteria have not been met, by how much, and the likely cause(s) of the completion criteria not being met; and b. submit to the department within 4 months of the 20th anniversary of the commencement of the action a Supplementary Offset Area Management Plan (SOAMP) for the approval of the Minister. 	Not applicable	Requirement not triggered; the offset criteria timeframe has not elapsed.
10	If required under condition 9, the SOAMP must detail the additional and revised management measures and/or offset site(s) that will be implemented and offset site(s) secured to compensate, to the satisfaction of the Minister, for the non-achievement of offset completion criteria specified in the approved OAMP.	Not applicable	Requirement not triggered; the offset criteria timeframe has not elapsed.
11	The approval holder must secure any offset site(s) specified in the approved SOAMP within 12 months of the date that the SOAMP is approved in writing by the Minister. The approved SOAMP must be attached to the legal mechanism used to secure the offset site(s) specified in the approved SOAMP.	Not applicable	Requirement not triggered; the offset criteria timeframe has not elapsed.
12	The approval holder must notify the department within 5 business days of the mechanism to secure each offset site having been executed.	Not applicable	Requirement not triggered; the offset mechanism is yet to be executed as the OAMP is pending approval.

Condition	Compliance Designation	Evidence / Comments
Matters of National Environmental Significance (MNES) Management Plan (MMP)		
13	For the protection of the EPBC Act listed threatened species the approval holder must submit to the department a MNES Management Plan for the written approval of the Minister prior to commissioning. The MNES Management Plan must be prepared in accordance with the department's Environmental Management Plan Guidelines. The approval holder must not commence commissioning until the MNES Management Plan has been approved in writing by the Minister. The approval holder must implement the approved MNES Management Plan for the duration of the approval.	Compliant / Not applicable
14	<p>The MNES Management Plan must ensure that impacts to EPBC Act listed threatened species do not exceed the clearance limits specified in condition 1 and that indirect impacts to EPBC Act listed threatened species are avoided and mitigated to the greatest possible extent, and include:</p> <ol style="list-style-type: none"> a. characterisation and estimation of the extent of all indirect impacts of the action, b. details of the measures (including habitat rehabilitation) that will be undertaken in the project area to avoid and mitigate impacts, including indirect impacts, on EPBC Act listed threatened species and their habitat during clearing, construction, operation and decommissioning, including but not limited to: <ol style="list-style-type: none"> i. the measures specified in Attachment H1 for the duration of construction; and ii. the measures specified in Attachment H2 for the duration of the approval. c. details of the specific timing of implementation, frequency and duration of the measures to be implemented, including the measures specified in Attachments H1 and H2; d. specification of interim milestones and completion criteria for habitat rehabilitation, e. details of the nature, timing and frequency of monitoring to ensure that impacts to protected matters do not exceed the clearance limits and that interim 	Compliant
<ul style="list-style-type: none"> ▪ The MNES Management Plan (MMP) has been developed and is being implemented. ▪ The MMP will be submitted for approval prior to commissioning. <ul style="list-style-type: none"> ▪ Refer to response to Condition 1 MNES habitat clearance limits. ▪ The MMP addresses the listed items, a summary of how each of the listed items is addressed is provided in the MMP. 		

Condition		Compliance Designation	Evidence / Comments
	<ul style="list-style-type: none"> milestones and completion criteria for habitat rehabilitation are likely to be achieved and subsequently are achieved; f. timing for the submission to the department of reports of monitoring outcomes; g. triggers and timing for the implementation of corrective actions if interim milestones and completion criteria are unlikely to be achieved; h. risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the MNES Management Plan, including a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix; and i. evidence of how the measures and corrective actions take into account relevant approved conservation advices and are consistent with relevant recovery plans and threat abatement plans. 		
15	The measures detailed in Attachment G1 and Attachment G2 must be implemented from the commencement of the action.	Assessment provided within this table (see below).	
Bird and Bat Management			
16	The approval holder must submit a Bird and Bat Management Plan (BBMP) to the department for the Minister's approval prior to commissioning. The approval holder must not commission unless the BBMP has been approved by the Minister in writing.	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
17	The approval holder must implement the approved BBMP from the commencement of commissioning.	Not applicable.	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
Environmental Outcomes			
18	The BBMP must ensure the risk of turbine impact and barotrauma impacts on EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species is minimised to the satisfaction of the Minister. The BBMP must include, but is not limited to:	Not applicable.	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.

Condition		Compliance Designation	Evidence / Comments
	<ul style="list-style-type: none"> a. adequate monitoring and analysis of findings to determine whether long-term site utilisation by EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species is affected by the action. b. Ongoing review and improvement of monitoring for the timely identification of EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species turbine collisions and barotrauma impacts and the timely collection and analysis of data. c. The development and implementation of on-ground management measures and corrective actions to achieve, to the satisfaction of the Minister, a long-term reduction in the risk of turbine collision and barotrauma impacts on EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species. 		
Desktop Assessment: Preliminary Site Characterisation			
19	<p>The BBMP must include a preliminary site characterisation for EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species to identify all drivers of presence on the project site and utilisation of the project site. This characterisation must include, but is not limited to, the consideration of:</p> <ul style="list-style-type: none"> iii. <u>site characteristics</u>: focal habitat features, topography, prevailing wind and weather patterns, wetlands (including outside the project area), and distance to potential nesting, roosting and foraging areas. iv. <u>species characteristics</u>: behaviour, flight and demographic factors (e.g. species presence [ongoing, transitory/migratory]), site use (e.g. transit, roosting, breeding and/or foraging), flight paths (including migratory flight paths), flight heights, soaring, flocking, and population numbers. 	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
Site Utilisation surveys			
20	The BBMP must include the results of the 24 months of pre-commissioning site utilisation surveys for EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species.	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.

Condition	Compliance Designation	Evidence / Comments
<p>21 Commencing within 2 months after the first instance of commissioning, the approval holder must undertake bird and bat site utilisation surveys over a period of at least 24 months which must:</p> <ul style="list-style-type: none"> a. be designed to ensure that species behaviour responses, including avoidance of turbines, and changes to project site utilisation, can be detected; b. be designed to support a before-after control-impact (BACI) monitoring framework; c. be conducted by a Suitably Qualified Ecologist; d. include site utilisation survey methodologies, and proposed timings, which are consistent with the pre-commissioning site utilisation survey methodologies; and e. be able to inform adaptive mitigation and management measures, and corrective actions, to ensure that the impacts are minimised to the satisfaction of the Minister. 	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
Long-term impact risk assessment		
<p>22 To assess the long-term risk of the wind turbines, the BBMP must:</p> <ul style="list-style-type: none"> a. Identify potential impacts to each relevant species from direct mortality, including analysis and mapping of suitable habitat, territories and activity/utilisation patterns/rates ('heat maps') in the project area and its surrounds. b. Assign a risk level of either low-risk turbine or high-risk turbine to each turbine depending on collision risk modelling results for EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species. Modelling results must be based an assessment of the potential impact pathways on each relevant species (based on the desktop assessment and site utilisation surveys) including, but not limited to: <ul style="list-style-type: none"> i. direct mortality from turbine collision and barotrauma; and ii. potential changes to site utilisation during construction and following commissioning. 	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.

Condition	Compliance Designation	Evidence / Comments
<p>23 For all high-risk turbines identified in accordance with condition 22 above, the approval holder must undertake Mathematical Collision Risk Modelling and include it in the BBMP in seeking the Minister's approval prior to commissioning:</p> <ul style="list-style-type: none"> a. incorporating a project area-wide assessment to identify all high-risk turbines; b. incorporating data collected during the pre-commissioning site utilisation surveys; c. incorporating the recommendations of a peer-review of the model; and d. including a literature review, justification of the choice of the model used, and a statement of all assumptions and uncertainties. 	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
<p>24 The BBMP must clearly demonstrate how relevant department policies and guidelines, and the SPRAT Database have been used to assess the potential impacts of mortality from turbine collision and barotrauma, and potential changes to site utilisation during construction and following commissioning on relevant EPBC Act listed threatened and EPBC Act listed migratory bird or bat species.</p>	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
<p>25 The BBMP must include a map for each relevant EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species which identifies those portions of the project area identified as high risk in accordance with condition 22.</p>	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
Long-term turbine collision and barotrauma monitoring		
<p>26 The BBMP must include a long-term monitoring program to test the validity of the risk assessment assignment made in accordance with condition 22 above. The long-term monitoring program must:</p> <ul style="list-style-type: none"> a. Include details of the nature, timing and frequency of monitoring to determine impacts to EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species as compared to avoiding the impacts to the satisfaction of the Minister, and be sufficient to determine whether the BBMP is likely to achieve the Minister's requirements in adequate time to implement all necessary corrective actions. b. Demonstrate how site-specific and species-specific risks and uncertainties have informed the design of the monitoring program (e.g. scavenger activity, searcher efficiency, etc.). 	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.

Condition	Compliance Designation	Evidence / Comments
<ul style="list-style-type: none"> c. Include a proposed timeframe for the regular validation and update of the Collision Risk Modelling using site-specific data collected through ongoing monitoring activities. d. Include details of requirements for DNA testing of carcasses that cannot be otherwise identified by a Suitably Qualified Ecologist. e. include details of requirements for carcass persistence trials to maximise turbine collision detection in a timely manner. f. Include details of requirements for searcher efficiency trials to maximise carcass detection in a timely manner. 		
Adaptive management framework		
<p>27 To ensure the BBMP requirements will be achieved for relevant EPBC Act listed threatened and EPBC Act listed migratory bird or bat species, the BBMP must include an adaptive management framework. The adaptive management framework must, at a minimum:</p> <ul style="list-style-type: none"> a. Be designed to clearly demonstrate the linkages between: <ul style="list-style-type: none"> i. implementation of mitigation and management measures; ii. monitoring, reporting and investigations; and iii. implementation of corrective actions to ensure impacts are avoided to the satisfaction of the Minister. b. Be designed to incorporate site-specific data collected through ongoing monitoring activities, and take into account changes to EPBC Act listed threatened and EPBC Act listed migratory bird or bat species risk ratings in accordance with the long-term monitoring program in condition 26. c. Propose timeframes for the implementation of tangible, on-ground corrective actions to be implemented if monitoring indicates impacts are unacceptable. d. Propose alternative mitigation and management measures supported by scientific literature if monitoring activities indicate impacts exceed impacts specified in the approved BBMP. 	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.

Condition	Compliance Designation	Evidence / Comments
28 If, during bird and bat utilisation surveys or during any other monitoring or incidental observation during post-commissioning, one or more individuals of an EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species is detected within the vicinity of a low-risk turbine, the approval holder must assign that turbine to be a high-risk turbine. A revised BBMP reflecting the revised risk rating of turbines must be submitted to the department for the Minister's approval within five business days of such a detection.	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
Reporting requirements		
29 The BBMP must include, at a minimum, the following reporting commitments (and proposed timeframes) for the provision of site-specific and species-specific information to the department: <ol style="list-style-type: none"> a. Annual turbine strike reports comprising raw strike data and strike notifications, survey methodologies, results of detection/persistence trials, environmental/meteorological conditions and associated statistical analysis. b. Estimations of the annual mortality rate for each relevant EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species, comprising supporting evidence from case studies of EPBC Act listed threatened species and EPBC Act listed migratory bird or bat species carcass size classes, results of persistence trials, searcher efficiency trials and substitute carrion trials, and annual probability of detection and monthly strike monitoring. c. Species occurrence records in accordance with the department's Guidelines for biological survey and mapped data (2018) available at: https://www.awe.gov.au/sites/default/files/documents/guidelines-biological-survey-mappeddata.pdf using the species observation data template on the department's website (sensitive ecological data must be identified and treated in accordance with the department's <i>Sensitive Ecological Data – Access and Management Policy V1.0 (2016)</i> available at https://www.awe.gov.au/sites/default/files/documents/sensitive-ecological-data-access-mgtpolicy.pdf or subsequent revision). 	Not applicable	Requirement not triggered; approved BBMP is required prior to commissioning; wind farm is yet to be commissioned.
<ul style="list-style-type: none"> ▪ Part B – Standard administrative conditions 		

Condition		Compliance Designation	Evidence / Comments
<ul style="list-style-type: none"> Notification of date of commencement of the action 			
30	The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	<ul style="list-style-type: none"> The action commenced 3.08.2022, notification of date of commencement was made by email dated 10.08.2022.
31	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.	Not applicable	<ul style="list-style-type: none"> Requirement not triggered; the action has commenced.
<ul style="list-style-type: none"> Compliance Records 			
32	The approval holder must maintain accurate and complete compliance records.	Compliant	<ul style="list-style-type: none"> Records are maintained and can be provided upon request.
33	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.	Not applicable	<ul style="list-style-type: none"> Requirement not triggered; a request has not been made.
<ul style="list-style-type: none"> Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media 			
<ul style="list-style-type: none"> Submission and publication of plans 			
34	<p>The approval holder must:</p> <ol style="list-style-type: none"> submit plans electronically to the department unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of: <ol style="list-style-type: none"> the date the plan is approved by the Minister the date of this approval, if the version of the plan to be implemented is specified in this approval, or the date a <i>Macrozamia conferta</i> research project plan, MNES Management Plan or revised action management plan is submitted to the Minister or the department, exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public 	Non-Compliant	<ul style="list-style-type: none"> The Interim Offset Area Management Plan was submitted via email to DCCEEW and published on the Project website (at: https://cleancoqueensland.com.au/wp-content/uploads/2022/04/KWF-Interim-Offset-Area-Management-Plan-Rev-2.pdf) in accordance with this condition. The OAMP is being prepared by a Suitably Qualified Ecologist and will be submitted to the DCCEEW within the subsequent reporting period. This non-compliance is considered administrative and to have no significant impact

Condition		Compliance Designation	Evidence / Comments
	d. keep plans published on the website until the end date of this approval.		<p>on MNES as the action has not directly impacted MNES habitat (refer Condition 1 response).</p> <ul style="list-style-type: none"> ▪ Commissioning will not occur until the final OAMP has been approved in writing. ▪ Submission and publication timeframes for the remainder of the plans required have not been triggered. ▪ This compliance report will be accessible via the website.
35	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under plans and 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 plans.	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; the submission of monitoring data as described is not required under the plans or conditions of this approval.
<ul style="list-style-type: none"> ▪ Annual Compliance reporting 			
36	<p>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:</p> <ol style="list-style-type: none"> publish each compliance report on the website within 60 business days following the relevant 12 month period 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 keep all compliance reports publicly available on the website until this approval expires exclude or redact sensitive ecological data from compliance reports published on the website 	Compliant	<ul style="list-style-type: none"> ▪ This report will be published on the project website within 60 business days of the 12 month period following the date of commencement of the action (3.08.2022). ▪ Once published, the Department will be notified within 5 business days of the date of publication.

Condition		Compliance Designation	Evidence / Comments
	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.		
<ul style="list-style-type: none"> ▪ Note: Compliance reports may be published on the department's website. 			
<ul style="list-style-type: none"> ▪ Reporting non-compliance 			
37	<p>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:</p> <ol style="list-style-type: none"> any condition which is or may be in breach a short description of the incident and/or non-compliance 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. 	Compliant	<p>As noted in the response to item 5, CleanCo has become aware that it may be non-compliant with Condition 5 of its approval</p> <ul style="list-style-type: none"> ▪ CleanCo discussed the potential non-compliance with the department by phone on 26th October [two business days] after it confirmed the facts of the incident
38	<p>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:</p> <ol style="list-style-type: none"> any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future the potential impacts of the incident or non-compliance the method and timing of any remedial action that will be undertaken by the approval holder. 	Compliant	<p>As noted in the response to item 5, CleanCo has become aware that it may be non-compliant with Condition 5 of its approval</p> <ul style="list-style-type: none"> ▪ CleanCo provided detail to the department on this potential non-compliance via email on 31 October 2023.
<ul style="list-style-type: none"> ▪ Independent audit 			
39	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; audit has not been requested.

Condition	Compliance Designation	Evidence / Comments
40 For each independent audit, the approval holder must: <ol style="list-style-type: none"> a. provide the name and qualifications of the independent auditor and the draft audit criteria to the department b. only commence the independent audit once the audit criteria have been approved in writing by the department c. submit an audit report to the department within the timeframe specified in the approved audit criteria. 	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; audit has not been requested.
41 The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; audit has not been requested.
<ul style="list-style-type: none"> ▪ Revision of action management plans 		
42 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.	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; revision has not been made.
43 The approval holder may choose to revise an action management plan approved by the Minister under conditions 13 and 16, 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.	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; revision has not been made.
44 If the approval holder makes the choice under condition 43 to revise an action management plan without submitting it for approval, the approval holder must: <ol style="list-style-type: none"> a. notify the department in writing that the approved action management plan has been revised and provide the department with: <ol style="list-style-type: none"> i. an electronic copy of the RAMP 	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; revision has not been made.

Condition		Compliance Designation	Evidence / Comments
	<ul style="list-style-type: none"> 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. <p>b. subject to condition 46, implement the RAMP from the RAMP implementation date.</p>		
45	The approval holder may revoke its choice to implement a RAMP under condition 43 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 43, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 43.	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; revised action management plan has not been revoked.
46	<p>If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <ul style="list-style-type: none"> a. condition 43 does not apply, or ceases to apply, in relation to the RAMP 15 b. the approval holder must implement the action management plan specified by the Minister in the notice 	Not applicable	<ul style="list-style-type: none"> ▪ Requirement not triggered; revision has not been made.
47	At the time of giving the notice under condition 46, the Minister may also notify that for a specified period of time, condition 43 does not apply for one or more specified action management plans.	Not applicable.	<ul style="list-style-type: none"> ▪ Requirement not triggered; notice has not been given.
<ul style="list-style-type: none"> ▪ Note: conditions 43, 44, 45 and 46 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval. 			
<ul style="list-style-type: none"> ▪ Completion of the action 			

Condition		Compliance Designation	Evidence / Comments
48	Within 30 days after the completion of the action, the approval holder must notify the department in writing and provide completion data.	Not applicable.	<ul style="list-style-type: none"> Requirement not triggered; action is not completed.
<ul style="list-style-type: none"> Attachment G1: Mitigation and management measures to be implemented during construction 			
1.1	Use existing tracks and locate proposed infrastructure within previously disturbed areas	Compliant	<ul style="list-style-type: none"> Existing access tracks within the Project footprint have been used where possible reducing disturbances to MNES habitat. New access tracks required for the action have been positioned generally within the Project footprint (approved for clearing) where possible. Where areas of cultural or environmental significance were encountered, micro siting occurred to avoid values.
1.2	Micro-siting of infrastructure must be implemented upon commencement of the action to reduce the extent of clearing required to less than the areas specified in condition 1	Compliant	<ul style="list-style-type: none"> The habitat clearing limits identified in Condition 1 have not been exceeded.
1.3	Areas identified for clearance must be clearly defined and detailed in site inductions.	Compliant	<ul style="list-style-type: none"> Areas identified for clearance clearly defined and detailed in Vegetation Disturbance Permits which are tool-boxed by the Principal Contractor's Site Environmental Representative and signed off on by all employees involved in clearance activities. Areas for vegetation clearance / retention physically demarcated on site using flagging and barricading where necessary.
1.4	Where infrastructure must cross waterways, areas of existing disturbance, if available, must be used. Where areas of existing disturbance for crossing waterways do not exist, the project footprint must be minimised, and large habitat trees and their surrounding native vegetation must be retained.	Compliant	<ul style="list-style-type: none"> Existing access tracks prioritised where not conflicting with Cultural Heritage restrictions. Regular assurance conducted through clearing activities by both Powerlink, the Principal Contractor and their subcontractors to ensure no unauthorised clearing.

Condition		Compliance Designation	Evidence / Comments
			<ul style="list-style-type: none"> Transmission line design early works undertaken to span over riparian areas wherever possible. Installation of new or upgraded waterway crossings undertaken in adherence to the Queensland Government document 'Accepted Development Requirements for operational work that is constructing or raising waterway barrier works'.
1.5	Pre-clearance surveys must be undertaken to identify any threatened flora or fauna within the vicinity of the clearing footprint.	Compliant	<ul style="list-style-type: none"> Pre-clearance surveys required by associated Species Management Plan were completed by independent environmental consultancy Ecosure. 'Pre-clear Fauna Habitat and Weed Report Report, Karara Laydown Area, July 2022', prepared by Ecosure identified habitat locations.
1.6	A fauna spotter-catcher must be present during all habitat clearance activities, with the authority to cease habitat clearance for an appropriate timeframe where one or more protected matters could be impacted.	Compliant	<ul style="list-style-type: none"> Fauna Spotter Catchers were engaged through independent environmental consultancy Ecosure to oversee all vegetation clearance works.
1.7	Sequential clearing to ensure that wildlife can safely move away from machinery to access adjacent or nearby habitat.	Compliant	<ul style="list-style-type: none"> All vegetation clearing works undertaken under the supervision of independent Fauna Spotter catchers. 24 hour period between enforced between clearing of understory and identified habitat trees enforced through associated Species Management Plan.
1.8	Relocation of fauna captured during clearing works to an appropriate nearby habitat area to be undertaken by a fauna spotter-catcher.	Compliant	<ul style="list-style-type: none"> Fauna Spotter Catchers present during all vegetation clearance.

Condition		Compliance Designation	Evidence / Comments
			<ul style="list-style-type: none"> Fauna Spotter Catchers obligated to maintain Fauna Interaction Registers, documenting species encountered and any relocation undertaken.
1.9	Cleared vegetation and scraped soil is not to be pushed up against trees, stored against fence lines or within 50 metres (m) of waterways.	Compliant	<ul style="list-style-type: none"> Cleared vegetation mulched on site and utilised for erosion and sediment control. Cleared soil stockpiled adjacent to work fronts and stabilised / sediment controls installed where necessary. Where inspections have identified a risk, they have been reported and corrective actions have been implemented as required.
1.10	Limit construction laydown areas and stockpiles to areas cleared or disturbed prior to the action.	Compliant	<ul style="list-style-type: none"> All construction laydown areas sited within easement approved clearance footprint.
1.11	Rehabilitation of temporary infrastructure areas must be undertaken as soon as practicable after clearing and after these areas are no longer required for the action.	Not applicable	<ul style="list-style-type: none"> Construction works still ongoing. Rehabilitation Plan drafted and will be executed upon commissioning of tower sites.
1.12	Temporary exclusion fencing must be established around cleared areas in locations of high ecological sensitivity.	Compliant	<ul style="list-style-type: none"> Temporary exclusion zones installed around incidental protected plant species (e.g. Macrozamia, Brachyscome).
1.13	Construction must cease during adverse weather conditions that have the potential to significantly increase dust, runoff or sedimentation.	Compliant	<ul style="list-style-type: none"> Clearing and access works frequently stopped / delayed owing to adverse weather conditions.
1.14	Declared weeds within the construction footprint will be treated or removed prior to the commencement of construction.	Compliant	<ul style="list-style-type: none"> Full site pre-construction weed survey and associated mapping undertaken by independent ecological consultancy WSP prior to works commencing. Known 'Restricted' weeds identified within the construction footprint. Mechanical removal of weed species undertaken prior to construction.

Condition		Compliance Designation	Evidence / Comments
			<p>Avoidance of infested areas occurring where mechanical removal not practical.</p> <ul style="list-style-type: none"> Post-construction weed surveys scheduled to identify areas where follow up herbicide treatment may be required.
1.15	No clearance in riparian zones other than that specified in this approval.	Compliant	<ul style="list-style-type: none"> Spatial analysis of pre and post clearance LiDAR data confirms no unauthorised riparian clearance occurred.
1.16	Relevant State and Commonwealth authorities will be contacted immediately if approved clearing limits are exceeded.	Not Applicable	<ul style="list-style-type: none"> Not triggered; clearing limits as per Condition 1 have not been exceeded.
1.17	Clearing and topsoil scraping will be staged and undertaken directly prior to the construction works for which they are required.	Compliant	<ul style="list-style-type: none"> Progressive clearing and earthworks undertaken.
1.18	Exposed soil will be stabilised with appropriate cover material.	Compliant	<ul style="list-style-type: none"> Soil binder and mulch utilised for stabilisation prior to rehabilitation works commencing. Sediment controls installed where necessary.
1.19	On-site stockpiles will be located above potential flood extents, within close proximity to the project and covered, if the stockpiled material could be dispersed by rain or wind.	Compliant	<ul style="list-style-type: none"> All stockpiles within approved Project Area. No stockpiles observed within known flood areas. Soil binder and mulch utilised on dispersal-prone stockpiled materials.
1.20	Clearing will only occur during daylight hours.	Compliant	<ul style="list-style-type: none"> Clearing and access works not permitted outside of daylight hours.
1.21	All temporary fencing will be removed promptly after works are completed.	Compliant	<ul style="list-style-type: none"> Temporary fencing installed around protected plant species to be removed following relocation/work front completion.
Koala			

Condition		Compliance Designation	Evidence / Comments
1.22	To avoid potentially blocking the movement of Koalas, temporary infrastructure must be located outside areas used by Koalas for linear connectivity.	Compliant	<ul style="list-style-type: none"> The temporary laydown area was the only temporary infrastructure established during the reporting period. This area was strategically located in previously cleared areas outside of mapped MNES species habitat.
1.23	<p>"Clearing of Koala habitat trees must be carried out in the following way to ensure not more than the following is cleared in any one stage:</p> <ul style="list-style-type: none"> – For a clearing site with an area of 6 ha or less – 50 percent of the site's area. – For a clearing site with an area of more than 6 ha – 3 ha or three percent of the site's area, whichever is the greater. – Ensuring that between each stage and the next there is at least one period of 12 hours starting at 6 p.m. on a day and ending at 6 a.m. on the following day during which no trees are cleared on the site." 	Compliant	<ul style="list-style-type: none"> Pre-clearance surveys demarcating all habitat features (hollows, stags, termite mounds, peeling bark, nests etc.) carried out by independent Ecologists prior to works commencing. On-site vegetation clearance procedure requires ground truthing of area to be cleared directly prior to clearance by Fauna Spotter Catchers and all habitat features to be checked, with any additional habitat features marked. All non-habitat bearing vegetation is cleared and habitat-bearing vegetation is left for 24 hours to allow for fauna migration.
1.24	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 to be cleared.	Compliant	<ul style="list-style-type: none"> Fauna Spotter Catchers present during all vegetation clearance. Any koalas identified within the clearing area were allowed to relocate of their own volition prior to clearing.
Greater Glider			
1.25	All potential denning trees that are to be impacted must be clearly marked.	Compliant	<ul style="list-style-type: none"> Pre-clearance surveys required by associated Species Management Plan were completed by independent environmental consultancy Ecosure. 'Pre-clear Fauna Habitat and Weed Report Report, Karara Laydown Area, July 2022', prepared by Ecosure identified habitat locations.

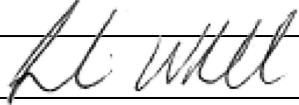
Condition		Compliance Designation	Evidence / Comments
1.26	All potential den trees must be inspected for EPBC Act listed threatened species prior to clearing.	Compliant	<ul style="list-style-type: none"> Fauna Spotter Catchers present during all vegetation clearance. Fauna Spotter Catchers obligated to maintain Fauna Interaction Registers documenting species encountered and any relocation undertaken.
1.27	Techniques to encourage Greater Gliders to leave hollows must be used prior to removal of the tree, including tapping trees and using spotlights. If Greater Gliders are potentially present, trees must be dismantled in sections.	Compliant	<ul style="list-style-type: none"> Fauna Spotter Catchers undertake surveys directly prior to all vegetation clearance Fauna Spotter Catchers obligated to maintain Fauna Interaction Registers documenting species encountered and any relocation undertaken.
Squatter Pigeon			
1.28	Warning signs must be erected on all tracks that intersect locations in which Squatter Pigeon has been confirmed present.	Compliant	<ul style="list-style-type: none"> Warning signs and associated speed limits observed as present in all Squatter Pigeon locations.
1.30	Areas of habitat for the Squatter Pigeon must be flushed for Squatter Pigeon individuals immediately prior to clearing.	Compliant	<ul style="list-style-type: none"> Areas of habitat for the Squatter Pigeon are flushed immediately prior to clearing via pre-clearance surveys and supervision by fauna spotter catcher.
Attachment G2: Mitigation and management measures to be implemented for the duration of the approval			
2.1	A maximum speed limit of 60 km/hr must apply to all vehicles using access roads and tracks.	Compliant	<ul style="list-style-type: none"> Warning signs and associated speed limits observed as present in all Squatter Pigeon locations – 40km/h enforced. Powerlink enforce a 40 km/h limit on vehicles traveling on easement access tracks.

Condition		Compliance Designation	Evidence / Comments
2.2	Vehicle access must be restricted to within the project footprint and existing access routes.	Compliant	<ul style="list-style-type: none"> Approved access shown on Environmental Work Plans. No known breaches reported.
2.3	Artificial site lighting must be kept to the minimum required for safety. Lighting beams must be directed downwards or use shields and baffles to limit light spill beyond the area that requires lighting.	Compliant	<ul style="list-style-type: none"> Requirements for artificial lighting are captured in the project VFMP.
2.4	Refuelling must not be undertaken within 50 metres of any waterway or retained habitat.	Compliant	<ul style="list-style-type: none"> Requirement covered in Contractor's procedures. No known breaches reported.
2.5	Storage of fuels, chemicals, wastes and other potentially environmentally hazardous substances must be banded or otherwise contained in areas away from waterways and retained habitat.	Compliant	<ul style="list-style-type: none"> All chemical storage restricted to compound area. On site satellite laydown areas located on cleared easement and away from waterways and remnant habitat. Laydown areas used for waste and for building materials storage only.
2.6	The prevalence of weeds and feral animals identified as threats to the EPBC Act listed threatened species must be kept at less than the prevalence of weeds and feral animals prior to commencement of the action	Compliant	<ul style="list-style-type: none"> The stated weed and pest management measures are required by Project VFMP Weed and pest management is captured by Project environmental inspection checklists. Inspection records generated during the reporting period indicate general compliance with weed management requirements. Information pertaining to invasive weeds is collected during pre-clearance surveys. Pre-clearance survey reports provide maps and a weed register recording weed species, location and abundance.

Condition		Compliance Designation	Evidence / Comments
			<ul style="list-style-type: none"> ▪ AE has engaged specialist services to develop and deliver a feral animal management program for the Project.
2.7	Grazing must be limited to prevent grazing degradation of vegetation within all riparian zones.	Compliant	<ul style="list-style-type: none"> ▪ Rehabilitation of riparian zones is yet to commence.
2.8	Fire management to prevent high intensity and frequent fires must be implemented.	Compliant	<ul style="list-style-type: none"> ▪ A bushfire management plan is in place for the Project which includes the preventative measures stated within the MMP.
2.9	A register of Squatter Pigeon sightings must be maintained and used 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.	Compliant	<ul style="list-style-type: none"> ▪ Sightings of squatter pigeons are maintained within the fauna spotter catcher pre-clearance surveys and post clearance reporting (if sighted). ▪ Signage is installed at locations where sightings have occurred to inform site personnel of collision risk.

5. Declaration of Accuracy

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

Signed	
Full Name	Julie Whitcombe
Position	General Manager- Strategy and Development
Organisation	CleanCo Queensland Limited, ABN 85 628 008 159
Date	31/10/2023

CONTROL

PREPARED BY	REVIEWED BY	APPROVED BY
LT 28/09/2023	Benita Blunden	Julie Whitmore