

windlab

Development Footprint Independent Assurance Plan

Gawara Baya Wind Farm

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2rog

Document Approval

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1 Introduction and purpose

This document is the Assurance Plan required by conditions 121 and 122 of the Gawara Baya wind farm approval under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**) dated 17 June 2024 (ref: 2021/9066) (the **Approval**). This Assurance Plan sets out matters relating to the independent audit for the purposes of conditions 6 and 117 of the EPBC Approval.

Condition 117 requires the independent audit of a draft of the Final Development Footprint (as defined in the Approval) to consider and provide an opinion on whether the Final Development Footprint:

- is likely to comply with the requirements of conditions 5, 7, 11, 18, 24, 30, 31, 44 and 53 of the Approval; and
- is consistent with the Assurance Plan required by condition 121.

The Assurance Plan must be approved by the Minister in writing under condition 121 prior to commencement of the independent audit under condition 117, and must be implemented until the commencement of commissioning (as defined in the Approval).

Design criteria required by conditions 5, 7, 11, 18, 24, 30, 31, 44 and 53 are set out in Table 1.

Purpose: the purpose of this Assurance Plan is to set out the process for a third-party to provide an independent opinion on whether the Draft Final Development Footprint, and any subsequent revision, is likely to comply with conditions 5, 7, 11, 18, 24, 30, 31, 44 and 53 the Approval. This audit includes an evaluation of the robustness and scientific appropriateness of evidence Windlab has used in designing the project's footprint and demonstrating compliance with the Approval.

Consistency with Departmental policy: this Assurance Plan has been developed in line with the Commonwealth Department of the Environment and Energy's *Independent Audit and Audit Report Guidelines For controlled actions which have been approved under Chapter 4 of the EPBC Act* (DoEE 2019)[1].

Note, this process refers to the following:

- **Draft Final Development Footprint** – this is draft of the Final Development Footprint the Approval Holder provides to the independent auditor for their consideration under condition 117 of the Approval.
- **Final Development Footprint** – is as defined in the Approval. This is the footprint that will be provided to the Department under condition 6 of the Approval together with the **Assurance Report**.
- **Assurance Report** – a report containing the results of the independent audit required under condition 117 of the Approval.

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[1] https://www.dcceew.gov.au/environment/epbc/publications/independent-audit-report-guidelines

1.1 CONTENT OF THIS ASSURANCE PLAN

The requirements of condition 122 are met in the following sections:

Condition No.	Content requirement	Where content is addressed in this Assurance Plan
122(a)	• the method and criteria for choosing the independent person to undertake the independent audit required under condition 117 • a commitment to submit to the department the independent auditor's: o the independent auditor's curriculum vitae, o the independent auditor's professional accreditations/memberships, o an overview of the independent auditor's relevant professional experience and suitability, and o any real or perceived conflicts of interest the independent auditor may have	Section 5
122(b)	• the assurance criteria which will be evaluated by the independent auditor under condition 117 to demonstrate the draft of the Final Development Footprint is likely to comply with the requirements of conditions 5, 7, 11, 18, 24, 30, 31, 44 and 53	Table 2
122(c)	• the method that will be used by the independent auditor to evaluate the Draft Final Development Footprint, including enabling the auditor to: o undertake any field surveys or inspections within the Development Corridor that the independent auditor considers necessary to verify any information provided by the Approval Holder o review the survey methods undertaken by the Approval Holder o review the Draft Final Development Footprint	Section 6
122(d)	• the process and timing of all assurance activities related to condition 117	Sections 6 and 7
122(e)	• details on how the findings of independent audit will be presented and supplied to the department	Section 7

1.2 DEPARTMENTAL VERIFICATION OF FINAL DEVELOPMENT FOOTPRINT

In addition to this Assurance Plan to be implemented by the Approval Holder, the Department may undertake verification or investigation work that the Department considers necessary or reasonable to verify the Final Development Footprint's compliance with the Approval.

The Approval Holder will facilitate access to the site for the above purpose and Departmental staff will comply with WHS requirements while on site.

The Department will advise the Approval Holder at least 2 weeks in advance of any proposed on-site verification.

Table 1. Design criteria the Final Development Footprint must comply with

Condition No.	Matter / issue	Extract of Condition[2]	Design criteria
5	Clearing for linear infrastructure	*To avoid and mitigate **harm** to **protected matters**, the Approval Holder must not clear any area wider than 60 metres for **linear infrastructure**.*	Linear infrastructure must be no wider than 60 metres.
7	Location	*To avoid and mitigate **harm** to **protected matters**, the **Final Development Footprint** must be located entirely within the **Development Corridor**.*	The Final Development Footprint must be located entirely within the Development Corridor.
11	Threatened and migratory species	*To avoid and mitigate **harm** to **protected matters**, the Approval Holder must not clear more than:* *a) 605.3 ha of **Sharman's Rock Wallaby Habitat**,* *b) 581 ha of **Greater Glider (northern) Habitat**, including:* *i) no more than 331 ha of **Greater Glider (northern) Denning Habitat**, and* *ii) no more than 250 ha of **Greater Glider (northern) Foraging Habitat**,* *c) 581 ha of **Masked Owl (northern) Habitat**,* *d) 614 ha of **Koala habitat**,* *e) 616 ha of **Red Goshawk Habitat**, including:* *i) no more than 331 ha of **Red Goshawk Breeding Habitat**, and* *ii) no more than 285 ha of **Red Goshawk Foraging Habitat**,* *f) 614 ha of **Grey-headed Flying-Fox Foraging Habitat**,* *g) 614 ha of **Spectacled Flying-Fox Foraging Habitat**,* *h) 546 ha of **Greater Large-eared Horseshoe Bat Roosting Habitat**,* *i) 545 ha of **Bare-rumped Sheathtail Bat Habitat**,* *j) 614 ha of **White-throated Needletail Habitat**,* *k) 614 ha of **Fork-tailed Swift Habitat**, and* *l) 0 ha of **occupied Magnificent Brood Frog Habitat***	The below upper disturbance limits apply to the Final Development Footprint: a) 605.3 ha of Sharman's Rock Wallaby Habitat, b) 581 ha of Greater Glider (northern) Habitat c) 581 ha of Masked Owl (northern) Habitat, d) 614 ha of Koala habitat, e) 616 ha of Red Goshawk Habitat f) 614 ha of Grey-headed Flying-Fox Foraging Habitat, g) 614 ha of Spectacled Flying-Fox Foraging Habitat, h) 546 ha of Greater Large-eared Horseshoe Bat Roosting Habitat, i) 545 ha of Bare-rumped Sheathtail Bat Habitat, j) 614 ha of White-throated Needletail Habitat k) 614 ha of Fork-tailed Swift Habitat, and l) 0 ha of occupied Magnificent Brood Frog Habitat.

[2] Bolded terms are defined in the Approval.

Condition No.	Matter / issue	Extract of Condition[2]	Design criteria
18	Red goshawk	*The Approval Holder must not:* *a) **clear** or **construct** within 400 metres of a **Red Goshawk nest**, and* *b) **clear** more than 25 percent of **Red Goshawk habitat** within 4 kilometres of a **Red Goshawk nest**.*	The Final Development Footprint will not be located within 400 m of a red goshawk nest, and the Final Development Footprint will not result in clearing more than 25% of red goshawk habitat within 4 km of a red goshawk nest
24	Sharman's rock wallaby	*The Approval Holder must not **clear** or **construct** or undertake **decommissioning** activities within 450 metres of **occupied Sharman's Rock Wallaby Breeding Habitat** from the **commencement of the Action** until the expiry of this approval.*	The Final Development Footprint will not be located within 450 m of occupied Sharman's rock wallaby breeding habitat
30	Magnificent brood frog	*The Approval Holder must not **clear** or cause any decline in the quality of **occupied Magnificent Brood Frog Habitat** in, or downstream of any **clearing** in the **Development Corridor**, including from sedimentation or erosion for the duration of this approval*	The Final Development Footprint will not result in clearing of occupied magnificent brood frog habitat. The location of the Final Development Footprint will not result in a decline in the quality of occupied Magnificent Brood Frog Habitat in, or downstream of the Development Corridor.
31	Greater glider	*From the **commencement of the Action** and until the expiry of this approval the Approval Holder must ensure that **Greater Glider (northern)** can move between all portions of its habitat within the **Development Corridor**, particularly those fragmented by the Action, by:* *a) not creating **isolated habitat patches** in the **Development Corridor**,* *b) ensuring **clearing** for **linear infrastructure** is not greater than 25 metres in width for at least 10 metres at every 100-metre length of linear infrastructure,* *c) install one or more **Glider Pole/s** or other ecologically appropriate **crossing measure** across any area **cleared** for **linear infrastructure** that is wider than 25-metres for more than 50 metres,* *d) monitoring where **glider poles** or other **crossing measures** are installed through:*	The Final Development Footprint has been designed to maintain connectivity for greater glider by: • not creating isolated habitat patches (as defined in the Approval), • every 100m, ensuring the width of linear infrastructure (as defined in the Approval) will be reduced to ≤25m for at least 10 metres, • ensuring glider crossing measures will be installed across linear infrastructure that is wider than 25m for >50m.

Condition No.	Matter / issue	Extract of Condition[2]	Design criteria
		*i) installing cameras that face the glider **poles** or other **crossing measures** and are capable of monitoring the use this infrastructure,* *ii) reporting on monitoring data collected on the use of **glider poles and crossing measures** by **Greater Gliders (northern)** and other animals to the **department** annually for at least the first 10 years post-installation, including data on time, date, prevailing weather conditions and location of any observation, and* *iii) regularly checking and maintaining all **glider poles** and **crossing measures** to ensure that they remain fully functional until the rehabilitation outcome of condition 56 has been met,* *e) Including the information required by this condition (condition 31) in each **compliance report**.* *f) ensuring no barbed wire fences are installed in **Greater Glider (northern)** habitat in the **Final Development Footprint** unless the barbed wire fences are required to meet Australian safety or construction standards or for insurance. Where barbed wire is installed by the Approval Holder in the **Final Development Footprint**, the Approval Holder must affix and maintain visibility tags or tape at every 30cm length of the barbed wire until the barbed wire is removed.*	
44	Wet Tropics WHA	*To avoid **harm** to **protected matters,** the approval holder must ensure no wind turbine generators are located within 4.7 kilometres of the **Wet Tropics World Heritage boundary**.*	Wind turbine generators will not be located within 4.7 km of the Wet Tropics World Heritage Area boundary
53	Wet Tropics WHA Scenic Amenity	*To ensure the Action does not impact the WTWHA scenic amenity, wind turbine generators located within the Final Development Footprint must not be visible from the Wallaman Falls Lookout*	Based on a visual impact assessment, wind turbine generators will not be visible from the Wallaman Falls Lookout.

2 Relevant parties

The following parties are relevant to this process and are defined below. Roles and responsibilities are also set out.

Independent auditor – an independent and suitably qualified person who will undertake the audit under condition 117 of the Approval and provide a written report of findings. They will be contracted by the Approval Holder.

Windlab (including all relevant subsidiaries) – project Approval Holder; responsible for:

- Developing the Assurance Plan and nominating an independent auditor
- Ensuring the Assurance Plan is carried out independently
- Providing all required documentation, data and the Draft Final Development Footprint to the independent auditor and to the Department
- Facilitating site access, as required (for the independent auditor and Departmental staff)
- Providing to the Department the Final Development Footprint and Assurance Report (including all supporting data) as required by condition 6 of the Approval, which demonstrates and provides evidence of how the Final Development Footprint achieves the outcomes required by conditions 5, 7, 11, 18, 30, 31, 44 and 53
- Arranging a meeting between the independent auditor and relevant representatives of the Approval Holder and the Department prior to the conduct of the independent audit process, and at any other times during the process, as required.

Commonwealth Department of Climate Change, Energy, the Environment and Water (the **Department**) – regulator; responsible for:

- ensuring the Approval Holder complies with this Assurance Plan
- Attending site visits, as required
- Receiving from the Approval Holder, the Final Development Footprint and Assurance Report (including all supporting data) as required by condition 6 of the Approval, which demonstrates and provides evidence of how the Final Development Footprint achieves the outcomes required by conditions 5, 7, 11, 18, 30, 31, 44 and 53.
- Potentially conducting a verification process by Departmental staff in the form of on ground surveys/thermal drone surveys at selected sites within 450m of the Final Development Footprint
- Providing to the Approval Holder the results of the verification process, if undertaken.

3 Overarching principles

This Assurance Plan is built around the following principles, consistent with those from DoEE (2019), including:

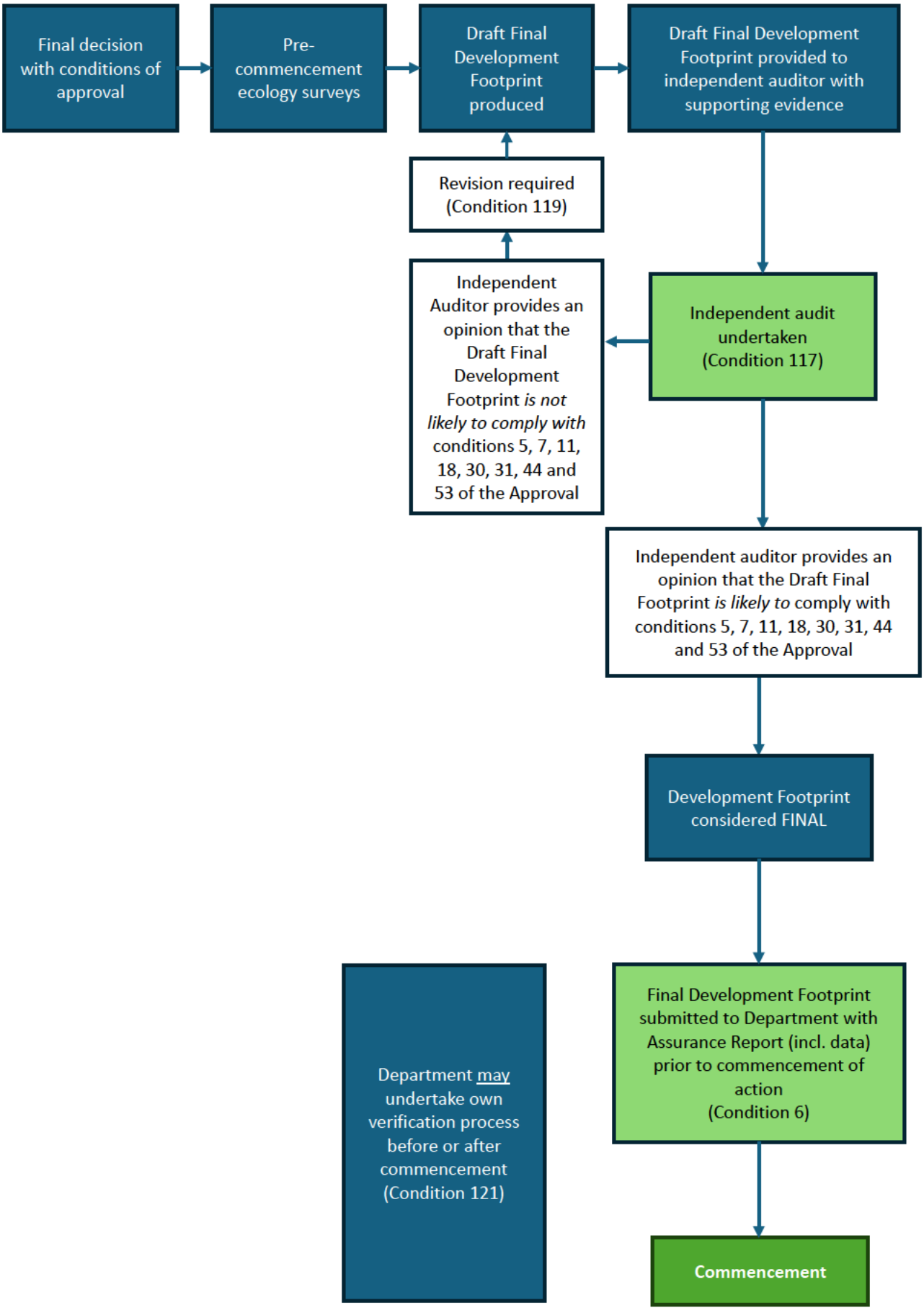
- The Assurance Plan (this document), including the assurance criteria must be agreed by the Department
- The nominated auditor must be both suitably qualified and independent. Specific criteria relating to qualifications and independence are provided below (Section 5).
- The assurance criteria must relate to conditions 5, 7, 11, 18, 30, 31, 44 and 53 of the Approval. These criteria are provided below at Table 2.
- The Draft Final Development Footprint can only be considered the Final Development Footprint once the audit has been completed and the independent auditor has provided an opinion that the Draft Final Development Footprint is likely to comply with the requirements of conditions 5, 7, 11, 18, 30, 31, 44 and 53.

- The independent auditor must provide a report (the Assurance Report) detailing their findings to the Approval Holder. The Approval Holder must submit the Final Development Footprint and the Assurance Report (including all supporting data) to the Department as required by condition 6 of the Approval, which demonstrates and provides evidence of how the Final Development Footprint achieves the outcomes required by conditions 5, 7, 11, 18, 30, 31, 44 and 53. Details of what the Assurance Report must contain are provided below (Section 7).
- The Assurance Report cannot be finalised until a complete layout of the Draft Final Development Footprint has been determined and appropriate evidence of how it meets the design requirements and conditions 5, 7, 11, 18, 30, 31, 44 and 53 of the Approval has been provided to the auditor for review and evaluation.
- The Department has access to and visibility of the audit, including receipt of all data provided to the independent auditor as part of the process, and prior notification of any site visits undertaken by the independent auditor. Representatives from the Department may attend at the site visits undertaken by the independent auditor at the Department's election.
- Once the independent audit is complete and determines all assurance criteria have been appropriately met, the Approval Holder will finalise the footprint, which will be deemed the Final Development Footprint. This will be submitted to the Department along with the outcomes of the audit (including all data).
- The Department has access to and visibility of the independent audit, including receipt of all data provided to the independent auditor as part of the process, and attendance at any site visits at the Department's discretion.

4 Workflow

The workflow associated with the Assurance Plan is set out in Figure 1 below. Importantly, there is a feedback loop associated with the Assurance Plan. If the independent auditor finds the Draft Final Development Footprint is not likely to comply with the requirements of conditions 5, 7, 11, 18, 30, 31, 44 and 53, the footprint *will not be deemed final* in accordance with condition 119 and the Approval Holder will be required to revise the Draft Final Development Footprint to address the opinion expressed by the independent auditor. An updated Draft Final Development Footprint will be provided to the independent auditor with details of the changes made to address the opinion expressed in the independent audit. The Development Footprint will be considered Final when the independent auditor provides an opinion that the Final Development Footprint is likely to comply with the requirements of conditions 5, 7, 11, 18, 30, 31, 44 and 53. The Assurance Report and the Final Development Footprint will be provided to the Department, along with the requirements of condition 6.

Figure 1. Independent audit workflow from approval to commencement



5 Independent auditor

The independent auditor must be both a suitability qualified person and independent from both the Approval Holder and the Gawara Baya project. In order to demonstrate their suitability, the independent auditor must be an environmental professional with:

- At least 10 years' experience in terrestrial ecology and environmental impact assessment
- Spatial analysis capabilities
- Previous EPBC Act audit or assurance experience
- Relevant professional accreditation[3]
- No relationship with Upper Burdekin Wind Farm Holdings Pty Ltd or have undertaken previous work on the Gawara Baya project[4]. (Note – if the auditor is an employee of a multidisciplinary organisation which has previously undertaken work on the Gawara Baya project or for Upper Burdekin Wind Farm Holdings Pty Ltd, the auditor must not conduct the independent audit in relation to work undertaken by the organisation).

To demonstrate suitability and independence, the Approval Holder must submit, on the independent auditor's behalf the following to the Department:

- Written statement of independence from the independent auditor
- The independent auditor's curriculum vitae
- Current professional accreditations/memberships
- Brief overview of relevant professional experience, addressing suitability criteria above, and
- (if relevant) any real or perceived conflicts of interest

The Department may undertake their own checks of the auditor's suitability.

The Independent auditor must be willing to confirm, in writing in the Assurance Report, that their work is equivalent to an audit and therefore, section 461 of the EPBC Act applies to their work.

6 Assurance method

The independent audit must be undertaken in such a way as to:

1. Consider and provide an opinion on whether the Final Development Footprint is:
    a. likely to comply with conditions 5, 7, 11, 18, 30, 31, 44 and 53 of the Approval, as they relate to the Draft Final Development Footprint design; and
    b. is consistent with this Assurance Plan
2. For the purposes of item (1) above, whether the data and methods used to demonstrate compliance are robust, repeatable and scientifically appropriate.

The Department will be provided with an overview of the method the independent auditor proposes to use to implement this process prior to them commencing their work. As per the roles and responsibilities (Section 2), the Approval Holder will also facilitate an opportunity for the Department to meet with the independent auditor to discuss the method.

[3] This may include full membership of the Environment Institute of Australia and New Zealand (EIANZ) or current Certified Environmental Practitioner (CEnvP) accreditation.

[4] This independence requirement extends to all other staff who work under the direction of the assurer in a support capacity.

The independent audit will involve desktop review of the data and information provided by the Approval Holder to demonstrate how the Draft Final Development Footprint meets the requirements as set out in Table 2 below. The information the Approval Holder must provide to the independent auditor for review is listed in Table 2. As part of the desktop process, it is expected the independent auditor will:

- Undertake a detailed review of all reports
- Conduct independent spatial analysis
- Review and interrogate a subset of raw ecology data. The subset must be of a sufficient size to provide confidence in the methods and conclusions.

The independent auditor will also be required to undertake a targeted field verification process. The purpose of the field verification is to provide the independent auditor with additional confidence that the outcomes reported and reviewed during the desktop assurance review are accurate and/or to clarify any points of uncertainty. The field verification process is not intended to repeat any of the ecological survey work.

The field verification process will:

- be undertaken at a strategic selection of sites, including unoccupied Sharman's Rock Wallaby Habitat, within the Development Corridor and chosen by the independent auditor, and
- use a sampling methodology that is appropriate to inform the audit process.

Key points of focus for the field verification will be:

- Inspecting a subset of rock piles that have been mapped unoccupied within Sharman's Rock Wallaby Habitat, as determined necessary by the independent auditor to provide confidence in the results of the Draft Final Development Footprint
- Inspecting a subset of occupied Sharman's Rock Wallaby habitat to ensure the boundary of occupied rock piles have been appropriately mapped
- Inspection of Red Goshawk nest locations and surrounding habitat within the Development Corridor (if relevant), to provide context to the desktop and spatial analysis
- Inspection of a subset of Red Goshawk Breeding Habitat where no nests have been mapped and surrounding habitat, to provide context to the desktop and spatial analysis
- Inspection of Magnificent Brood Frog habitat locations that have been mapped unoccupied and/or occupied and surrounding habitat, to provide context to the desktop and spatial analysis
- Any other areas of uncertainty or interest the independent auditor wishes to inspect, notably those connected to a high density of habitat such as those within or adjoining the Michael Creek river corridor.

The independent auditor must have access to all sites determined to be unoccupied Sharman's Rock Wallaby Habitat within the Development Corridor (noting the independent auditor is not required to survey all unoccupied Sharman's Rock Wallaby Habitat).

The field verification process will be attended by the independent auditor and a representative of the Approval Holder, who will facilitate site access and ensure WHS protocols are implemented. If required, relevant field ecologists may also attend and this will be at the discretion of the independent auditor. Representatives from the Department may also attend at their election.

The independent auditor must include details of the field verification process in their Assurance Report, including date, location, focus areas and any evidence collected.

7 Assurance report

The independent auditor must prepare a written report (the Assurance Report) detailing their findings of the audit. Per DoEE (2019), the report must:

- Explicitly address all assurance criteria in Table 2 below
- Include details of actual measurements made, sample sizes and evidence obtained. Where sample records are referenced (e.g. pre-clearance surveys) a sufficiently representative sample of records must be reviewed
- Not report by exception and must include details of all findings made against each criterion
- Ensure that findings are based on independently verifiable evidence and must not place an over-reliance on representations made by the Approval Holder or their representatives\
- Include a definitive statement of whether, the Draft Final Development is or is not likely to be compliant with conditions 5, 7, 11, 18, 30, 31, 44 and 53 of the Approval.
- Be submitted to the department by the Approval Holder prior to commencement of the action.
- If the independent audit identifies the Draft Final Development Footprint is not likely to meet the assurance criteria and conditions5, 7, 11, 18, 30, 31, 44 and 53 of the Approval, the Approval Holder must revise the Draft Final Development Footprint, and provide to the Department all material revisions to the Draft Final Development Footprint and comments on those revisions.

The structure of the Assurance Report will be at the discretion of the independent auditor, however all conclusions must be appropriately justified and supported by evidence. The reporting structure suggested in DoEE (2019) is considered fit for purpose and is provided in Attachment A.

The Assurance Report must also include a declaration by the independent auditor as to the veracity of the report. See DoEE (2019) Appendix C—Audit Report—Auditor's Certification for an appropriate format.

The Approval Holder must provide the full Assurance Report to the Department as part of the submission of the Final Development Footprint, including all information/data provided by the Approval Holder to the independent auditor for the purpose of undertaking this process or collected by the auditor during field work. The Approval Holder may prepare a statement in response to the Assurance Report and provide this to the Department.

8 Assurance criteria

The independent audit must include an evaluation of the extent to which the assurance criteria have been met, including consideration of the robustness of data used to demonstrate if and how the criteria have been met.

Per DoEE (2019), the assurance criteria must:

- Be developed and approved prior to the commencement of the audit
- Address conditions 5, 7, 11, 18, 30, 31, 44 and 53 as required by conditions 117 and 122 of the Approval
- consider each approval condition in its entirety and then be broken down into its component elements.

This document (the Assurance Plan) has been prepared in accordance with the above and has been approved by the Department. Table 2 sets out the assurance criteria, prepared in accordance with DoEE (2019) and as approved by the Department.

Table 2. Assurance criteria for Gawara Baya Final Development Footprint

The following is assurance criteria that be evaluated by the independent auditor to demonstrate the Draft Final Development Footprint is likely to comply with the requirements of conditions 5, 7, 11, 18, 24, 30, 31, 44 and 53.

Condition of Approval	Assurance criteria to be met by the Approval Holder to demonstrate that the Approval holder has met the Compliance Condition	Supporting data or information to be provided by the Approval Holder to the independent auditor[5]
5 *To avoid and mitigate harm to protected matters, the Approval Holder must not clear any area wider than 60 metres for linear infrastructure*	The Final Development Footprint must not have any areas of clearance for linear infrastructure that is wider than 60 metres.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files and maps for: ○ Project layout ○ Width and length of clearing clearly identified across the whole Final Development Footprint
7 *To avoid and mitigate harm to protected matters, the Final Development Footprint must be located entirely within the Development Corridor*	The Final Development Footprint must be situated entirely within the Development Corridor identified at the time of the decision of Approval.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files and maps including: ○ Development corridor ○ Project layout clearly identifying edges of clearing
11 *To avoid and mitigate harm to protected matters, the Approval Holder must not clear more than:* *a) 605.3 ha of Sharman's Rock Wallaby Habitat,* *b) 581 ha of Greater Glider (northern) Habitat, including:* *i) no more than 331 ha of Greater Glider (northern) Denning Habitat, and* *ii) no more than 250 ha of Greater Glider (northern) Foraging Habitat,* *c) 581 ha of Masked Owl (northern) Habitat,* *d) 614 ha of Koala habitat,* *e) 616 ha of Red Goshawk Habitat, including:* *i) no more than 331 ha of Red Goshawk Breeding Habitat, and* *ii) no more than 285 ha of Red Goshawk Foraging Habitat,* *f) 614 ha of Grey-headed Flying-Fox Foraging Habitat,* *g) 614 ha of Spectacled Flying-Fox Foraging Habitat,* *h) 546 ha of Greater Large-eared Horseshoe Bat Roosting Habitat,* *i) 545 ha of Bare-rumped Sheathtail Bat Habitat,* *j) 614 ha of White-throated Needletail Habitat,* *k) 614 ha of Fork-tailed Swift Habitat, and* *l) 0 ha of occupied Magnificent Brood Frog Habitat*	The Final Development Footprint must not intersect with an area of habitat greater than the limits set by Condition 11. Habitat for each species in Condition 11 is defined in the Approval.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files and maps for: ○ Habitat mapping for all species ○ Final Development Footprint

[5] The assurer can request any additional data to support the evaluation of any criteria, and this will be provided by the Approval Holder (if available). Data listed here are deemed to be the most relevant and a minimum requirement for review and consideration. The list is not intended to constrain the material the assurer may receive or review. All Spatial files and maps are to be presented in accordance with the EPBC Act Map Data Guidelines at dcceew.gov.au/sites/default/files/documents/epbca-maps-data-guidelines.pdf.

Condition of Approval	Assurance criteria to be met by the Approval Holder to demonstrate that the Approval holder has met the Compliance Condition	Supporting data or information to be provided by the Approval Holder to the independent auditor[5]
15 *Prior to commencement of the Action and prior to the submission of a Final Development Footprint, a suitably qualified field ecologist must survey all Red Goshawk Breeding Habitat within 400 metres of any proposed clearing for Red Goshawk nests.*	Relevant interpretation condition While not a compliance condition listed under condition 117, the independent auditor should have regard to condition 15 to inform their opinion on whether the Final Development Footprint is likely to comply with condition 18. Criteria Surveys within Red Goshawk Breeding habitat (as defined in the Approval and repeated below) have been undertaken and: 1. Employed a method suitable to detect Red Goshawk nests (per definition below) 2. Were of sufficient survey effort to adequately survey all areas of Red Goshawk Breeding habitat 3. Have been undertaken for all Red Goshawk breeding habitat within 400 m of the Final Development Footprint 4. Were undertaken by a suitably qualified field ecologist with at least 3 years of work experience Habitat definitions as defined in the Approval and repeated below: *Red Goshawk Breeding habitat* – areas with large trees greater than 14 metres high and within 2.5 kilometres of a watercourse with permanent water, which occur within Red Goshawk Foraging Habitat. The location of Red Goshawk Breeding Habitat identified in the Project Area at the time of the decision is represented in Attachment E [of the Approval] by the dark blue shaded zones labelled 'Breeding / nesting'. *Red Goshawk Foraging Habitat* – coastal and subcoastal tall open forests and woodlands; tropical savannas traversed by wooded or forested creeks and rivers; freshwater wetlands and their margins; and edges of rainforest. The location of Red Goshawk Foraging Habitat identified in the Project Area at the time of the decision is represented in Attachment E [of the Approval] by the light blue shaded zones labelled 'Foraging'. *Red Goshawk nest* – a large structure (approximately 0.6–1.2 metres wide) made of dead sticks with a saucer-shaped hollow at top, thickly lined with finer twigs and green eucalyptus leaves.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Relevant field survey reports, which must include survey methods and results including both the location and description of any recorded nests. • Spatial files and maps for: ○ Final Development Footprint ○ Red Goshawk Breeding habitat ○ Location of survey effort (tracks, assessment points, etc) ○ Location of any recorded nests • Qualifications of field ecologists who undertook the surveys
18 (a) *The Approval Holder must not:* *a) clear or construct within 400 metres of a Red Goshawk nest*	The Final Development Footprint must be located at least 400 m from any Red Goshawk nests detected during field surveys (undertaken per Condition 15).	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files and maps for: ○ Final Development Footprint ○ Location of any recorded nests
18 (b) *The Approval Holder must not:* *b) clear more than 25 percent of Red Goshawk habitat within 4 kilometres of a Red Goshawk nest.*	The Final Development Footprint must not result in clearing of more than 25% of Red Goshawk habitat (as defined in the Approval and repeated below) within 4 kilometres of a Red Goshawk nest detected during field surveys (undertaken per Condition 15). Habitat definitions as defined in the Approval and repeated below: *Red Goshawk habitat* – Red Goshawk Breeding Habitat and Red Goshawk Foraging Habitat. *Red Goshawk Breeding habitat* – areas with large trees greater than 14 metres high and within 2.5 kilometres of a watercourse with permanent water, which occur within Red Goshawk Foraging Habitat. The location of Red Goshawk Breeding Habitat identified in the Project Area at the time of the decision is represented in Attachment E [of the Approval] by the dark blue shaded zones labelled 'Breeding / nesting'. *Red Goshawk Foraging Habitat* – coastal and subcoastal tall open forests and woodlands; tropical savannas traversed by wooded or forested creeks and rivers; freshwater wetlands and their margins; and edges of rainforest. The location of Red Goshawk Foraging Habitat identified in the Project Area at the time of the decision is represented in Attachment E [of the Approval] by the light blue shaded zones labelled 'Foraging'.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files and maps for: ○ Final Development Footprint ○ Red Goshawk habitat ○ Location of any recorded nests, buffered by 4 km

Condition of Approval	Assurance criteria to be met by the Approval Holder to demonstrate that the Approval holder has met the Compliance Condition	Supporting data or information to be provided by the Approval Holder to the independent auditor[5]
21 *Prior to commencement of the Action and prior to the submission of a Final Development Footprint, a suitably qualified field ecologist must survey all areas within 500 metres of any proposed clearing to determine the number of Sharman's Rock Wallaby present, their distribution and the location of Sharman's Rock Wallaby Breeding Habitat, Sharman's Rock Wallaby Foraging Habitat and Sharman's Rock Wallaby Dispersal Habitat. Surveys must be consistent with the Sharman's Rock Wallaby Survey Guidelines.*	Relevant interpretation condition While not a compliance condition listed under condition 117, the independent auditor should have regard to condition 21 to inform their opinion on whether the Final Development Footprint is likely to comply with condition 24. Criteria Surveys for Sharman's Rock Wallaby (SRW) have been undertaken and: 1. Employed a method consistent with the *Sharman's Rock Wallaby Survey Guidelines*[6] 2. included all SRW Breeding Habitat and SRW foraging habitat within 500 m of the Final Development Footprint 3. Included all SRW habitat identified as unoccupied SRW Breeding Habitat that has surrounding SRW Foraging Habitat within the Final Development Footprint. 4. Were undertaken by a suitably qualified field ecologist with at least 3 years of work experience 5. Determined the number of SRW and their distribution within 500 m of the Final Development Footprint 6. Determined the age structure of the SRW population and their distribution within 500 m of the final Development Footprint. 7. Determined the location and extent of occupied SRW Breeding Habitat in the Development Corridor 8. Used the survey data from the surveys to map the location of all SRW habitat within the Final Development Footprint and 500 m on either side, as per the habitat definitions below. Habitat definitions as defined in the Approval and repeated below: *Sharman's Rock Wallaby Breeding Habitat* – rocky outcrops, complex boulder piles, gorges and cliffs in open forest and grassy woodland. The location of Sharman's Rock Wallaby Foraging Habitat identified at the time of the decision is represented in Attachment F [of the Approval] by the light blue shaded zones labelled 'Potential foraging'. *Sharman's Rock Wallaby Foraging Habitat* – all areas within 450 metres of SRW Breeding Habitat. The location of Sharman's Rock Wallaby Foraging Habitat identified at the time of the decision is represented in Attachment F [of the Approval] by the light blue shaded zones labelled 'Potential foraging'. *Sharman's Rock Wallaby Dispersal Habitat* – all areas that connect to Sharman's Rock Wallaby Foraging Habitat. The location of SRW Dispersal Habitat identified at the time of the decision is represented in Attachment F [of the Approval] by the light grey shaded zones labelled 'Connecting'. *Sharman's Rock Wallaby Habitat* – means *Sharman's Rock Wallaby* Breeding Habitat, *Sharman's Rock Wallaby* Foraging Habitat and *Sharman's Rock Wallaby* Dispersal Habitat. *Occupied Sharman's Rock Wallaby Breeding Habitat* – Sharman's Rock Wallaby Breeding Habitat where Sharman's Rock Wallaby are present, have been observed, or there are signs of use by the species (e.g. scats, tracks and smooth/polished rock surfaces). All Sharman's Rock Wallaby Breeding Habitat is considered Occupied Sharman's Rock Wallaby Breeding habitat unless proven unoccupied by a suitably qualified field ecologist.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to all SRW observations, survey effort and habitat recorded within the project area. • Relevant field survey reports as per condition 22, which must include survey methods and results including both the location and description of all SRW sightings, mapping of SRW Breeding Habitat and the location of occupied SRW Breeding Habitat. • Spatial files and maps for: ○ Final Development Footprint ○ Location of survey effort (tracks, assessment points, etc) ○ Location of any recorded SRW individuals, including all SRW observations recorded in the PER ○ SRW habitat mapping derived from field surveys and per the habitat definitions provided in this table • Qualifications of field ecologists who undertook the surveys • Provide field access to conduct the targeted field verification process within the development corridor. • Including access to all areas of SRW habitat identified as unoccupied SRW Breeding Habitat that has surrounding SRW foraging habitat within the Final Development Footprint.
24 *The Approval Holder must not clear or construct or undertake decommissioning activities within 450 metres of occupied Sharman's Rock Wallaby Breeding Habitat from the commencement of the Action until the expiry of this approval.*	The Final Development Footprint must be located at least 450 m from all occupied SRW Breeding Habitat (informed by surveys undertaken per Condition 22).	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files for: ○ Final Development Footprint ○ SRW habitat mapping derived from field surveys and per the habitat definitions provided in this table

Condition of Approval	Assurance criteria to be met by the Approval Holder to demonstrate that the Approval holder has met the Compliance Condition	Supporting data or information to be provided by the Approval Holder to the independent auditor[5]
27 *Prior to commencement of the Action, a suitably qualified field ecologist must survey all potential Magnificent Brood Frog Habitat in or downstream of any proposed clearing, for the presence of Magnificent Brood Frog. The surveys must be consistent with the frog survey guidelines.*	Relevant interpretation condition While not a compliance condition listed under condition 117, the independent auditor should have regard to condition 27 to inform their opinion on whether the Final Development Footprint is likely to comply with condition 30. Criteria Surveys for Magnificent Brood Frog (MBF) have been undertaken and: 1. Employed a method consistent with the *Survey guidelines for Australia's threatened frog* [7] 2. Have been undertaken within all potential MBF habitat in or downstream of the Final Development Footprint 3. Were undertaken by a suitably qualified field ecologist with at least 3 years of work experience 4. Used survey data from the surveys to map the location of SRW habitat per the habitat definitions below. Habitat definitions as defined in the Approval and repeated below: *Potential MBF Habitat* – seepage areas in open eucalypt forests with volcanic geologies that contain leaf litter, tussocks or grasses that are above 700 metres elevation. The location of potential MBF Habitat identified in the Project Area at the time of the decision is as defined in the Approval. *Occupied MBF Habitat* – any potential MBF Habitat where the Magnificent Brood Frog has been observed or confirmed present through calls.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Relevant field survey reports, which must include survey methods and results including both the location and description of all MBF sightings, mapping of occupied MBF Breeding Habitat. • Spatial files for: ○ Final Development Footprint ○ Location of survey effort (tracks, assessment points, etc) ○ Location of any recorded MBF individuals ○ MBF habitat mapping derived from field surveys and per the two habitat definitions provided in this table • Qualifications of field ecologists who undertook the surveys • Provide field access to conduct the targeted field verification process within the development corridor.
30 *The Approval Holder must not clear or cause any decline in the quality of occupied Magnificent Brood Frog Habitat in, or downstream of any clearing in the Development Corridor, including from sedimentation or erosion for the duration of this approval.*	The Final Development Footprint will not clear occupied Magnificent Brood Frog Habitat. Clearing for the Final Development Footprint will not result in a decline in the quality of occupied Magnificent Brood Frog Habitat in, or downstream of the Development Corridor.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files for: ○ Final Development Footprint ○ Location of survey effort (tracks, assessment points, etc) ○ Location of occupied and unoccupied Magnificent Brood Frog in, or downstream of proposed clearing.
31 *From the commencement of the Action and until the expiry of this approval the Approval Holder must ensure that Greater Glider (northern) can move between all portions of its habitat within the Development Corridor, particularly those fragmented by the Action, by:* *a) not creating isolated habitat patches in the Development Corridor,* *b) ensuring clearing for linear infrastructure is not greater than 25 metres in width for at least 10 metres in length, at every 100-metre length of linear infrastructure,* *c) install one or more Glider Pole/s, or other ecologically appropriate crossing measure, across any area cleared for linear infrastructure that is wider than 25-metres for more than 50 metres,* *d) monitoring where glider poles or other crossing measures are installed through:* *i) installing cameras that face the glider poles or other crossing measures and are capable of monitoring the use this infrastructure,*	The Final Development Footprint must: 1. Not have isolated habitat patches in the Development Corridor, 2. If isolated habitat patches would be created, for every 100 metre stretch of linear infrastructure that has a cleared area that is greater than 25 metres in width, there must be a stretch of linear infrastructure with a cleared area no wider than 25 metres for at least 10 metres. 3. If isolated habitat patches would be created, have one or more Glider Pole/s, or other ecologically appropriate crossing measure, across any area cleared for linear infrastructure that is wider than 25-metres for more than 50 metres, Habitat definitions as defined in the Approval and repeated below: *Glider pole* – erected poles that facilitate the dispersal of Greater Glider (Northern) (GG) through cleared areas. *Greater Glider (northern) Denning Habitat* –Greater Glider (northern) Foraging Habitat with large, old trees, with hollows, greater than 10 centimetres in diameter at breast height. The location of Greater Glider (northern) Denning Habitat identified in the Project Area at the time of the decision is represented in Attachment B [of the Approval] by the dark blue shaded zones labelled 'Foraging and denning / shelter'.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Relevant field survey reports, which must include survey methods and results including both the location and description of all Greater Glider sightings, mapping of Greater Glider Habitat. • Spatial files for: ○ Final Development Footprint ○ Location of survey effort (tracks, assessment points, etc) ○ Location of any recorded GG individuals ○ GG habitat mapping derived from field surveys and per the habitat definitions provided in this table ○ Identification of width of linear infrastructure across the whole Final Development Footprint ○ Location of sections of road 25 metres in width for at least 10 metres within every 100 metre length of linear infrastructure ○ Approximate location of Glider Poles within stretches of linear infrastructure that is wider than 25 metres for more than 50 metres in length • Qualifications of field ecologists who undertook the surveys

[6] https://www.qld.gov.au/__data/assets/pdf_file/0035/67967/sharmans-rockwallaby.pdf
[7] https://www.dcceew.gov.au/sites/default/files/documents/survey-guidelines-frogs.pdf

Condition of Approval	Assurance criteria to be met by the Approval Holder to demonstrate that the Approval holder has met the Compliance Condition	Supporting data or information to be provided by the Approval Holder to the independent auditor[5]
ii) reporting on monitoring data collected on the use of glider poles and crossing measures by Greater Gliders (northern) and other animals to the department annually for at least the first 10 years post-installation, including data on time, date, prevailing weather conditions and location of any observation, and *iii) regularly checking and maintaining all glider poles and crossing measures to ensure that they remain fully functional until the rehabilitation outcome of condition 57 has been met,* *e) including the information required by this condition (condition 31) in each compliance report.* *f) Ensuring that no barbed wire fences are installed in Greater Glider (northern) habitat in the Final Development Footprint unless the barbed wire fences are required to meet Australian safety or construction standards or for insurance. Where barbed wire is installed by the Approval Holder in the Final Development Footprint, the Approval Holder must affix and maintain visibility tags or tape at every 30cm length of the barbed wire until the barbed wire is removed*	*Greater Glider (northern) Foraging Habitat* –eucalypt forests and woodlands of north-eastern Australia. The location of Greater Glider (northern) Foraging Habitat identified in the Project Area at the time of the decision is represented in Attachment B [of the Approval] by the light blue shaded zones labelled 'Dispersal and lower quality foraging'. *Greater Glider (northern) habitat* – Greater Glider (northern) Denning Habitat and Greater Glider (northern) Foraging Habitat. *Isolated habitat patch* – an area of Greater Glider (northern) Habitat that is completely surrounded by cleared areas where the narrowest width of any of the cleared areas is greater than 25 metres without one or more Glider Pole/s, or other ecologically appropriate crossing measure.	• Provide field access to conduct the targeted field verification process within the development corridor.
44 *To avoid harm to protected matters, the approval holder must ensure no wind turbine generators are located within 4.7 kilometres of the Wet Tropics World Heritage boundary.*	The Final Development Footprint must ensure wind turbine generators are at least 4.7 km from the boundary of the WTWHA.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Spatial files for: ○ Final Development Footprint ○ Boundary of the WTWHA
53 *To ensure the Action does not impact the WTWHA scenic amenity, wind turbine generators located within the Final Development Footprint must not be visible from the Wallaman Falls Lookout.*	The Final Development Footprint must ensure no wind turbine generators are visible from Wallaman Falls Lookout.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Visual Impact Assessment of the Final Development Footprint (including photomontages from the Wallman Falls Lookout)
Compliance with conditions of Approval		
The Final Development Footprint must meet conditions 5, 7, 11, 18, 24, 30, 31, 44 and 53. This will be demonstrated by meeting all assurance criteria listed against these conditions.	The **F**inal **D**evelopment **F**ootprint must meet conditions 5, 7, 11, 18, 24, 30, 31, 44 and 53. This will be demonstrated by meeting all assurance criteria listed against these conditions.	This is a non-exhaustive list. The independent auditor may request further information from the Approval Holder in regard to any information that is missing in relation to this condition and assurance criteria. • Summary statement of how design criteria have been met, cross referencing evidence as required to demonstrate compliance with conditions 5, 7, 11, 18(a), 18(b), 24, 30, 31, 44 and 53 of the Approval.

Attachment A: potential reporting structure

The following is the recommended format for the independent auditor's evaluation against assurance criteria (adapted from DoEE 2019, Appendix B).

Assurance criteria	Verification Method	Evidence	Finding and justification
[CRITERIA] **Each criterion must be included in its entirety and then broken down into its individual element (if relevant).**	Detail how the independent auditor went about measuring compliance with the requirements of each criterion. E.g. reviewing documentation, examining the raw data or a subset of raw data, undertaking a site inspection	The independent auditor must identify all information used to inform their opinion including: - details of any evidence obtained and actual measurements made that were used in the evaluation. - All documents, data, and mapping used, and - any site visits undertaken (including dates, locations, titles, observations) and - conclusions reached.	Findings may be: - Requirement met - Requirement not met Provide detailed justification for findings against the criteria.



About Windlab

Windlab is a global renewable energy development company. It was established to commercialise world leading atmospheric modelling and wind energy assessment technology, developed by Australia's premier scientific research institute, the CSIRO. Windlab owns and exclusively utilises this suite of industry best practice tools to identify and efficiently develop, finance, construct and operate high quality wind farms around the world, with considerably greater certainty and substantially less risk.

This technological advantage has enabled Windlab to amass a large portfolio of high quality wind farm development sites across North America, Australia, New Zealand and Southern Africa.

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