



**AUSCRIPT AUSTRALASIA PTY LIMITED**

ACN 110 028 825

**T:** 1800 AUSCRIPT (1800 287 274)

**E:** [clientservices@auscript.com.au](mailto:clientservices@auscript.com.au)

**W:** [www.auscript.com.au](http://www.auscript.com.au)

**TRANSCRIPT OF PROCEEDINGS**

---

TRANSCRIPT IN CONFIDENCE

---

O/N H-953132

**INDEPENDENT PLANNING COMMISSION**

**DETERMINATION MEETING**

**RE: YASS VALLEY WIND FARM MOD 1**

**PANEL:** **ALAN COUTTS**  
**PROF ZADA LIPMAN**  
**ADRIAN PILTON**

**ASSISTING PANEL:** **DAVID KOPPERS**  
**JORGE VAN DEN BRANDE**

**DEPARTMENT OF  
PLANNING AND  
ENVIRONMENT:** **MIKE YOUNG**  
**DIANA MITCHELL**

**LOCATION:** **IPC OFFICE**  
**LEVEL 3, 201 ELIZABETH STREET**  
**SYDNEY, NEW SOUTH WALES**

**DATE:** **10.39 AM, MONDAY, 29 OCTOBER 2018**

MR A. COUTTS: Good morning and welcome. Before we begin, I would like to acknowledge the traditional owners of the land on which we meet and pay my respects to the elders, past and present. Welcome to the meeting today on development application SSD 6698 MOD 1 in relation to the Yass Valley Wind Farm from Goldwind Australia Proprietary Limited, the proponent, who is seeking to modify its development consent, including to increase the approved wind turbine tip height from 150 metres to 171 metres, reduce the maximum number of approved turbines from 79 to 75, and increase the vegetation clearing from 68.3 hectares to 179.8 hectares.

My name is Alan Coutts. I'm chair of the panel. Joining me are my fellow commissioner, Professor Zada Lipman and Mr Adrian Pilton, and also with us is Jorge Van Den Brande from the Secretariat, and I will let you introduce yourselves at the end of my introduction. In the interests of openness and transparency and to ensure the full capture of information, today's meeting is being recorded and a full transcript will be produced and made available on the Commission's website.

This meeting is one part of the Commission's decision-making process. It is taking place at the preliminary stage of this process and will form one of several sources of information upon which the Commission will base its decision. It is important for the commissioners to ask questions of attendees and to clarify issues whenever we consider it appropriate. If you are asked a question and are not in a position to answer, please feel free to take the question on notice and provide any additional information in writing, which we will then put up on our website. Thank you. And we will now begin. So really, it's over to you, Mike - - -

MR M. YOUNG: Okay.

MR COUTTS: - - - to give us a bit of a run-through of the key aspects of the project. I guess, just to help in that, we're obviously interested around the issue of vegetation clearing. We're probably also particularly interested in, because of the increased length of the blades, the impact that may or may not have on raptors, in particular, but other bird life. So I guess they're probably the two key main areas that we're interested in, but there obviously are others as well. So over to you. Would you like to introduce yourselves first.

MR YOUNG: Do we introduce ourselves? Sure. I'm Mike Young. I'm the director of resource and energy assessments at the Department of Planning and Environment.

MS D. MITCHELL: I'm Diana Mitchell. I'm a senior planning officer at the Department of Planning and Environment.

MR YOUNG: So thank you for having us today. We haven't prepared any specific presentation. We understand you had a briefing from the proponent prior to this meeting - - -

MR COUTTS: We did.

MR YOUNG: - - - which I presume included key aspects of what's being proposed.

5 MR COUTTS: Correct.

MR YOUNG: We've also provided you with an assessment report that's fairly detailed. It details a fairly long process of assessment and community consultation over the last 12 months or more. We've also provided the Commission with draft  
10 recommended conditions, as I understand it, to modify the existing development consent for the Yass Valley Wind Farm. So we were not prepared, I guess, to do a full presentation, but really thinking that you might have had some questions based on your review and analysis of the documentation and also being cognisant of the fact that you've had a presentation from the proponent, and you will also be  
15 undertaking a public meeting and visiting the site in due course, as I understand it. So happy to respond to specific questions, but I guess we were not aware that we were needing to prepare a presentation on the project per se.

MR COUTTS: Mike, that's fine. I guess, one of the issues of particular interest is  
20 the vegetation clearing. The original approval, or the original proposal, had quite extensive vegetation clearing proposed and that was wound back quite significantly in the final approval to a fairly small part of clearing. Now, whilst we've had the presentation from the company and they've given their justification for that, I guess we would be interested to hear from the department, you know, your assessment  
25 around that, because, you know, well, clearly we've gone from a relatively small area, almost back to where the original proposal was suggested.

MR YOUNG: That's fine. We can comment on that, Alan. So when the project was first proposed, it was obviously a much larger wind farm and included a number  
30 of other clusters of turbines that, in the end, the Planning and Assessment Commission, at the time, refused or did not approve, and so only the one cluster out of the original, I think, three clusters were approved: the Coppabella cluster of turbines, so - - -

35 MR COUTTS: And I think the department didn't support that either at the time, did it?

MR YOUNG: Well, there was a - that was consistent with our recommendation.

40 MR COUTTS: Yes.

MR YOUNG: Yes, that's right. I think that some of the history of this project is that, at the time of the development consent, Epuron was the holder of that development consent and so, subsequent to the planning approval, the project - and  
45 I'm sure Goldwind has filled you in about this - was purchased by Goldwind, or its subsidiary, to develop the project. Now, it's not uncommon that once detailed design is commenced on these wind farm project, and indeed other large industrial projects,

that certain matters come to light during that detailed design process that require amendment or potentially different impacts to what were originally assessed.

5 And so my understanding of the genesis of the modification in respect to the additional vegetation clearing is that the detailed design process, particularly in regard to the roads or the access tracks, I should say, in and around the site, as well as some other ancillary infrastructure, has resulted in a recalculation of the disturbance footprint particularly on associated with those access tracks on steeper land and once you looked at those changes, that then – across the site, that then has resulted in, you know, a relatively – a significant increase in the predicted impact on 10 vegetation, native vegetation and obviously some EECs in particular. So I think, in broad terms, it's really as a result of Goldwind looking at the design of the project that, I guess, they had purchased or took a controlling interest in, and they then recalculated what they would need in order to build the project from a feasibility and 15 engineering constructability sense.

MR COUTTS: Environment and Heritage, I mean, obviously they've had some issues around that level of clearing, also around what might be seen as high to moderate, low, etcetera. What's your sense of where they're at the moment? 20

MR YOUNG: So obviously we've consulted with OEH throughout the project and, indeed, during the original project as well. I think there has been some concern about the accuracy of the mapping undertaken to support the assessment. I think there has been also a concern about the nature and extent of the impacts associated 25 with the redesign of the project and the proposed modification. That included, in order to address those issues, a range of additional information was provided through the process. There has been site visits undertaken in consultation with OEH and revised surveying and classification of the vegetation communities associated with that additional work. 30

So my understanding now is that we have taken a conservative approach to assuming what those particular vegetation communities are and presented a worst case scenario to you in terms of the nature and extent of that clearing. I think the key thing to be aware of with the clearing is that we're not talking about hundreds of hectares of 35 trees or woodland, we're mostly talking about additional areas of derived native grassland that will be impacted by the changes.

MR COUTTS: Yes, I've seen some photos.

40 MR YOUNG: Yes. So you will obviously see that once you go to the site - - -

MR COUTTS: Yes.

45 MR YOUNG: - - - and see what kind of vegetation is likely to be impacted. So I think it's important to recognise that the additional clearing, in terms of woodland, EEC is something in the order of 20 hectares as I understand it. Is that correct?

PROF Z. LIPMAN: 21, yes.

MS MITCHELL: Yes, that's right.

5 MR YOUNG: Yes, yes.

MS MITCHELL: Yes.

10 MR YOUNG: And so the bulk of the additional clearing is derived – classified is derived native grassland, and I guess what

...is that correct?

15 PROF Z. LIPMAN: 21. Yes.

MR COUTTS: Yeah. Yeah.

20 MS MITCHELL: Yes. That's right. Yeah.

MR YOUNG: And so the bulk of the additional clearing is derived – classified as derived native grassland, and I guess what we've applied is the government policy of – for offsetting. We've looked at avoidance to the greatest extent practicable, minimisation. We've particularly looked at places like Whitefields Road and the roadside vegetation there and trying to minimise that through the process, and you'll see that that's gone down from, I think, 4.9 hectares approximately down to less than half a hectare of impact. So I guess we've sought to apply the biodiversity offsetting policy and – recognising that, in order to construct a project, you know, from a calculation point of view, there will be greater impact than what was originally proposed, but the – if Goldwind is not able to, I guess, gain approval for those additional impacts, the indications are that they've indicated to us that they're not in a position to actually build the project. It's essentially a feasibility or a constructability issue for them.

35 PROF LIPMAN: To what extent are these vegetation clearances attributable to the modification?

MR YOUNG: I think they're entirely – the additional clearing is - - -

40 PROF LIPMAN: Yes.

MR YOUNG: - - - entirely due to the modification.

45 PROF LIPMAN: So, in other words, if they're still 150 metres high, they wouldn't require - - -

MR YOUNG: There are some minor increases associated with the foot print - - -

PROF LIPMAN: Yes.

MR YOUNG: - - - of the turbines themselves, but I think that's a fairly minor component.

5

MS MITCHELL: It is. That's right. So it is really related to the feasibility and constructability of the project. The increase in the height of the turbines isn't entirely relevant in terms of increasing the vegetation clearance. Yeah. Yeah. So, regardless of if the came – or if they were proposing to increase the blade length, they would still need to increase their vegetation clearance.

10

MR YOUNG: That's right.

MS MITCHELL: Yeah.

15

MR YOUNG: So even – the – I guess what they're telling us is that the – they cannot, at this stage, build the project as approved.

MR COUTTS: ..... that's ..... to us.

20

MR YOUNG: Yeah. Yeah.

MS MITCHELL: Yeah. Yeah.

MR COUTTS: I mean, is OEH comfortable where it's at now, I mean, in terms of how comfortable they may be.

25

MR YOUNG: Well, that's something you'd obviously have to ask OEH, but we've had a range of submissions. We consulted most recently on the recommended conditions and included any final comments from OEH on those conditions. So, as I said, we've applied the policy in terms of offsetting - - -

30

MR COUTTS: Yeah.

MR YOUNG: - - - and we've taken a worst-case scenario that, even if you include – assume that some of the vegetation communities are in better quality than Goldwind's consultants' estimation or assessment, then you're still in a position where the impacts of that clearing are not significant in terms of the ecological impact - - -

40

MR COUTTS: Yeah.

MR YOUNG: - - - and hence we're in a situation where we can apply the policy and offset accordingly. So will there be additional impacts associated with the modification? Absolutely. Are they mostly on derived native grassland instead of, you know, high quality woodland? Yes. Can they be offset? Are there offsets available within the area or on the site? There are. So I guess we consider that the

45

additional impacts on the vegetation are not so significant that we ought not to, you know, allow the changes necessary to realise the benefits of the project as approved.

5 MR COUTTS: On residence C04 – it's the only residence that's located within 2.3 kilometres - - -

MS MITCHELL: That's correct.

10 MR COUTTS: - - - and under the - - -

MR YOUNG: Is that the - - -

MS MITCHELL: That's the residence that's located just here.

15 MR YOUNG: Yes.

MS MITCHELL: Yeah.

20 MR YOUNG: Yep.

MR COUTTS: And I'm just reading from your report here, which says that, under the policy guidelines, it's not approvable unless the applicant provides a detailed assessment and justification for their placement in relation to that residence. Now, we've put that question to the proponent, and the proponent's response, I guess, in general terms was that its impacts haven't really changed from the original approval to this approval, but they haven't done a separate justification. I guess I'm interested in your response to that issue of the need for justification for C04, and I know they're still negotiating with that – owner of that property.

30 MR YOUNG: So - - -

MR COUTTS: I suppose, Mike, it's just an issue - - -

35 MS MITCHELL: Yeah. Yeah.

MR COUTTS: - - - in the report that we don't have an answer to at the moment.

MR YOUNG: Yeah. So the visual assessment bulletin obviously provides guidance to assessors and decision-makers about potential acceptability of visual impacts, and so it indicates that, at the turbine height proposed of a 170-metre blade tip, where possible, impacts ought to be avoided on residences that are within or less than 2.3 kilometres at that height, but, as you know, under the guidelines, it's not a prohibition. It's an indication as to where significant impacts may occur, visual impacts may occur, and I think, in this situation, we consider that the impacts on that particular property are not significant, that the ability to – or the current conditions which allow the landowner to request visual impact mitigation such as screening and landscaping would provide some mitigation of those impacts or some reduction of

those impacts. The other thing to say is that the change in the blade tips from 150, I think it is, to 171 - - -

MS MITCHELL: To 171.

5

MR YOUNG: Whilst a strict reading or application of the guideline would ask for further justification, it is in the context of a modification, ie, those impacts of 150-metre turbines at that kind of distance is already approved. So you're really looking at what are the additional impacts on that particular property as a result of a 21-metre increase in a number of – well, in the turbines. So our position is that the nature and extent of those changes are perhaps noticeable but not necessarily significant or material and that in the – the rating, I think, was – for C04 was - - -

10

MR COUTTS: Low to moderate.

15

MR YOUNG: - - - low to moderate, and we didn't think that that, in the schema of those impacts, was – it would remain as low to moderate. So, in those sort of circumstances, we think a relevant regulatory response or a sufficient regulatory response is to retain the condition that allows visual landscaping and screening. My understanding is, as you say, that the company may well be seeking to reach an agreement with that particular landowner, but, obviously, we have to assess things as they stand at the moment, and my understanding is that, subject to clarification – is that there's no agreement with that landowner at this stage.

20

MR A. PILTON: I'm intrigued with the idea that you're going to screen it with new trees and things, given the time it's going to take – I assume ..... plant little trees. So it'll only reach sort of reasonable height by the time it's going to be decommissioned. So the screening – it's just not going to happen.

25

PROF LIPMAN: No. It's not .....

30

MR YOUNG: It's up – that's up to the landowner. So if the landowner wishes to request screening - - -

35

MR PILTON: I understand that, but - - -

MR YOUNG: - - - then it's up to – look, the efficacy of screening varies from location to location, and also the landowner may wish to reach an agreement rather than have landscaping on his property, and that's something that's up to the landowner. We're not saying that visual screening would eliminate the impact. We're saying that is something that would contribute to minimising the impact, but our basic assessment is that the change from 150 to 171 at that type of distance at that property would not really change the overall visual impacts as approved.

40

MR PILTON: .....

45



PROF LIPMAN: One would have thought they would have done a separate justification for it. I mean, I do accept your assessment, but - - -

5 MR YOUNG: The issue, Zada, is that the guidelines – whilst they've been published since - - -

PROF LIPMAN: Yeah.

10 MR YOUNG: - - - November 2016, there's very few projects that have actually gone through using those guidelines, and the application of those guidelines as well – there's even fewer examples of those. In fact, this might even be the first one where those guidelines have been applied. So I think it's fair to say that proponents and their consultants are, you know, coming to grips with exactly what those guidelines require and in what circumstances certain information needs to be provided. So our  
15 guess our view is that whilst the guidelines would cause the concerned authority or the assessing body to ask questions about impacts – that, in this case, those questions are answered - - -

20 PROF LIPMAN: Been answered. Yes.

MR YOUNG: - - - to the extent that the impacts are not significant.

25 PROF LIPMAN: But there's also the noise impact. So it has the – you know, the – go over 35 decibels

MR YOUNG: ...to ask questions about impacts that, in this case, those questions are answered - - -

30 PROF LIPMAN: They've been answered, yes.

MR YOUNG: - - - to the extent that the impacts are not significant.

35 PROF LIPMAN: But there's also the noise impact. So it has the – you know, that it go over 35 decibels, the noise limit is blowing, so it does get a visual and a noise impact in certain circumstances.

40 MR YOUNG: Yes, my understanding of the noise is that, under certain conservative assumptions in the noise predictions, there was some minor exceedences predicted - - -

PROF LIPMAN: Yes.

45 MR YOUNG: - - - but both the EPA and the department considered that those impacts could be managed.

PROF LIPMAN: In fact, shut down the turbine.

MR YOUNG: Well, firstly, that they're unlikely to eventuate, because of the conservative nature of the modelling, because the modelling assumes that the wind direction is coming from all directions at the one time, which in reality is something that doesn't occur; and, secondly, that the – if there was, when the noise monitoring is undertaken, if there were exceedences identified, but as you say those would be readily managed by noise – sector management or something similar where you either turn them off or you turn some of the turbines to operate more slowly.

PROF LIPMAN: Thanks.

MR COUTTS: What's the general – well, I suppose, there is some relevance to this ..... but what's the general view on the impact of wind farms on raptors, because it does seem to be that, in this particular one, the only birds that are likely to be impacted by the increase in the length of the turbines are raptors: the wedge-tailed eagle or the little eagle. Presumably, in most of these wind farms, it's the raptor that's most at risk, and it seems to me, just looking at it, that the mitigation measures aren't potentially going to be all that effective. I mean, you know, you remove carcasses and so forth, but wedge-tailed eagles also go after live prey. I mean, what, do we just shrug our shoulders and say, "Bad luck, wedge-tailed eagles"?

MR YOUNG: So, no. The issue of bird and bat strike for windfarms is a policy area that the New South Wales Government is continuing to look at in consultation with the Commonwealth Government. The approach at this stage is to recognise that turbines in some locations, you know, do present, you know, a risk particularly to raptors, less so to woodland birds, particularly if the height of the turbine blade is, you know, elevated and, you know, above 30 or 40 metres, the impacts on woodland birds are, you know, likely to be less. So it is a disproportionate effect, arguably, on raptors and so forth.

There is limited data, or there is data being collected by a number of the operating wind farms, and whilst there's a number of approved in the Southern Highlands approved wind farms, there's actually not all that many operating wind farms. There's some, and that data is being collected, which is a requirement of the development consents applying to those wind farms. And so OEH, for example, is collecting that information and looking at what are the nature and extent of the impacts in reality. What kind of birds are being impacted? Is it a situation, from a conservation significance point of view, that we should be concerned about the particular species?

And I think that that data is showing that approximately each turbine, on average per year, there are one to two bird strikes per year; that the vast majority of those bird strikes are common species, such as magpies or, you know, starlings, or those sorts of things, or even introduced species, however, there are a number of raptors, particularly wedge-tailed eagles, being impacted as a result of those – the operation of the turbines. What we are trying to do is get a sense of whether the nature and extent and the numbers of impacted birds are such that it's having a population – an impact on the local population of some of those species, and I think at this stage that

work is, whilst it's being undertaken and looking at, you know, whether there's a policy – a greater policy response required to perhaps offset those impacts, for example, that work hasn't been completed at this stage, but OEH is taking the lead on that kind of bird and bat strike methodology.

5

In the interim, there is some draft guidance around bird and bat adaptive management plans, which is what we've recommended be put in place here, and the focus of that – and I know you have raised questions about its efficacy – in the absence of an alternative response, what we believe those plans can achieve is that, if the data from a particular site is collected and there is a significant impact on a particular species identified, then we would have the regulatory power to potentially ask them to switch off turbines or clusters of turbines, particularly during sensitive seasons, etcetera.

10

So there are examples of that, where, at the Gullen Range Wind Farm, which is another Goldwind wind farm, where certain clusters of turbines in proximity to some remnant bushland are not allowed to operate for three or four months a year as a result of the fact that that bushland supports powerful owl breeding populations. So I agree that there is more policy work needed to be done, but I wouldn't say that those issues aren't – or are being ignored in the process. In addition to that, I think it's important to say that, in the assessment, less relevant here because the turbines are approved, but in fresh Das, etcetera, we do particularly look at the avoidance of wedge-tailed eagle nests, for example, either avoiding those or having significant setbacks from those nest, particularly if they're being used or utilised by fledglings, etcetera. So there are some responses that the government is looking at to minimise that risk, but it is fair to say that the raptors, and particularly the wedge-tailed eagles, with some more common species, and I would say that it's important to note that the wedge-tailed eagles are not threatened species under the relevant designations, so

20

25

30

---  
PROF LIPMAN: The little eagle, I think is.

35

MR YOUNG: The little eagle is threatened. I would have to sort of consult the data or take that on notice about, but my understanding is that there have been very few instances of any threatened species being struck by turbines in that part of New South Wales. Not to say that it can't happen or it won't happen, but the evidence is that it's rare.

40

MR COUTTS: Perhaps if you could come back to us more on that, it would be just

---  
MR YOUNG: Yes.

MR COUTTS: It would be helpful.

45

MR YOUNG: Yes.

MR COUTTS: Presumably, the conditions in here with around the management plan, and so forth, include data collection.

5 MR YOUNG: They do. They require, you know, baseline data collection and then ongoing data collection, yes.

MR COUTTS: Do you guys have any questions? Zada?

10 PROF LIPMAN: Just an observation that we've asked the proponent for more details, because some of the figures that you took from their documentation in the report are a bit misleading about the RSA.

MR COUTTS: It was around the RSA.

15 PROF LIPMAN: It was just very, very complicated, because the figures don't stack up when you look at the – but they said that they would get back to us with some modified figures on that.

20 MR YOUNG: All right. Okay.

MR COUTTS: Yes, I think it – I mean, we asked some questions, because just on the raw looking at the RSA figures, when you do some calculations, the 15 per cent figure, we get 35 per cent when we do the figures. The response was that they're going to come back to us and explain it, but a lot of that seems to be around where the hub height is measured from and whether they use 60 metres or 50 metres, so the proponent has indicated to us it is quite explainable, so they're going to come back to us and we can provide you with it. It will be on our website anyway, so - - -

30 MR YOUNG: I mean, with the increase in the RSA of the project as a whole, obviously that does increase the impacts of bird strike, albeit that four turbines are being taken out, which obviously minimise it to some extent, but, overall, I assume the RSA goes up by - - -

35 PROF LIPMAN: It does, yes.

MR YOUNG: - - - whatever percentage.

PROF LIPMAN: Yes.

40 MR YOUNG: It needs to be clarified.

MS MITCHELL: Yes, that's right.

45 PROF LIPMAN: It's sort of 15 per cent in the figures, but I think there's – it's not clear how the 15 per cent was derived, because if you use the raw figures, it should be 35 per cent. So – yes.

MR YOUNG: Okay.

PROF LIPMAN: They're going to come back on that.

5 MR YOUNG: Sure. That's fine. Yes.

MS MITCHELL: Yes, sure.

10 MR COUTTS: No more questions?

MR PILTON: No.

MR COUTTS: All right. Well, thank you.

15 PROF LIPMAN: I've just got one slight question.

MR COUTTS: Yes.

20 PROF LIPMAN: It's about the – you know, the agreement; the community agreement. How do you feel about that as opposed to the BPA? It doesn't seem as enforceable.

25 MR YOUNG: That's a good question, Zada; a good observation. So we would prefer any community benefit funds to be incorporated into a BPA. Obviously that gives a consent authority the ability to condition – directly condition those contributions and enforce them, I guess, through the terms of the BPA. In this situation, the parties involved, being the company and the councils, agreed that they need not

30 ...contributions and enforce them, I guess, through the terms of the VPA. In this situation the parties involved, being the company and the councils, agree that they need not, I guess renegotiate or redraft or re-execute the VPA. And so it became, I guess, arguably more of a corporate commitment to provide those funds and the  
35 councils – both councils are satisfied with that. We're obviously in a position – or in a difficult position in the sense of we are not – VPAs obviously are voluntary and so we're not in a position necessarily to require that those additional funds to be incorporated in the VPA. That's my understanding. Is that - - -

40 MS MITCHELL: That's right.

PROF LIPMAN: Yes, yes. I think so, unfortunately.

45 MR YOUNG: It may be a matter you could put to the company because it really is in their hands at this stage. I mean, our view is that there already a VPA in place from the original conditions. That's commensurate with the fund – the quantum that is typical of wind farms in that part of New South Wales. And so that the additional

funds were over and above what would typically be paid by other players in the market down in that part of New South Wales. And so we were not really in a position, either legally or even from an assessment point of view, able to sort of, you know, formalise that commitment any further than we have.

5

PROF LIPMAN: Yes .....

MR COUTTS: I mean, my assessment of the presentation that Goldwind provided to us was it was quite a professional presentation. They – their relationships –  
10 because they've got a number of projects sort of going at the moment. Are they having good relationships with their local communities or is it too early to say?

MR YOUNG: Alan, I guess I will answer that question tangentially, if I may. I'm often asked that question at community meetings about the history of companies and  
15 proponents and what their reputation is and what their track record is in terms of compliance and other activities. And the only response I'm able to give to those sort of questions is that the Environmental Planning and Assessment Act as it's formed at this stage, we're not in a position to really ask who or comment as to any reputational  
20 issues of companies undertaking these proposals as opposed to some other legislation where we're able to look at fit and proper person and those sorts of tests. Under the EP&A Act we just have to ask what and how and not who. And so that's really the only response I can give to that, Alan, I think.

MR COUTTS: Okay. Thank you. Any more questions?  
25

MR .....: No.

MR COUTTS: No. Okay. Thanks guys.

MR YOUNG: Thank you.  
30

PROF LIPMAN: Thank you so much.

MR .....: Thank you very much.  
35

**RECORDING CONCLUDED**

**[11.13 am]**