

CRITIQUE OF TRANSCRIPT

Submitted by: O. HOWLAND-JONES
PYRAMUS



AUSCRIPT AUSTRALASIA PTY LIMITED
ACN 110 028 825

T: 1800 AUSCRIPT (1800 287 274)
E: clientservices@auscript.com.au
W: www.auscript.com.au

TRANSCRIPT OF PROCEEDINGS

TRANSCRIPT IN CONFIDENCE

O/N 11-1034749

INDEPENDENT PLANNING COMMISSION

MEETING WITH APPLICANT

RE: CRUDINE RIDGE WIND FARM MOD 1

**PANEL: PETER DUNCAN
PETER COCHRANE**

ASSISTING PANEL: DAVID KOPPERS

**APPLICANT: ED MOUNSEY
GRAHAM DENTON
PATRIC MILLAR
TIM MICHALAS
KALYA ABBEY
CHERYL O'DWYER**

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

DATE: 12.33 PM, WEDNESDAY, 5 JUNE 2019

MR P. DUNCAN: All right. Thank you. Good afternoon and thanks for coming in. We will start recording. Before we begin, I would like to acknowledge the traditional owners of the land on which we meet today, the Gadigal people. I would like to pay my respects to elders past and present. Welcome to the meeting today on the proposal whereby CWP Renewables, you the applicant, is seeking to modify the approval for the Crudine Ridge Wind Farm to reduce the maximum number of wind turbines from 77 to 37, to align the development consent with the Commonwealth approval under the Environmental Planning and Biodiversity Conservation Act and revise the road design for Aarons Pass Road and associated increase in vegetation clearing by approximately 5.05 hectares.

My name is Peter Duncan. I am chair of the IPC panel. Joining me is my fellow commissioner Peter Cochrane, and also with me today is David Koppers from the Commission. As I said before, at the end of this introduction, I will ask you to introduce yourself and your respective roles on the project. In the interest of openness and transparency and to ensure the full capture of information, today's meeting is being recorded, and a full transcript will be provided 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 the process from the Commission's point of view and will form one of several sources of information upon which the Commission will base its decision.

It is important for the Commission to ask questions of attendees and to clarify issues whenever we consider it appropriate. If you're asked a question and are not in a position to answer today, please feel free to take the question on notice and provide the additional information in writing, which we will then put on the website. Could I also request that all members here today introduce themselves before speaking for the first time and for all members to ensure that they do not speak over the top of other members, to ensure the accuracy of the transcript. Could I ask at this stage, for the recording, if you could introduce yourself and your role on the project.

MR E. MOUNSEY: Yes. So Ed Mounsey. I'm the chief operating officer and head of development with CWP Renewables. I've been involved with the project since 2007: so very start of prospecting for sites in New South Wales - - -

MR DUNCAN: Okay.

MR MOUNSEY: - - - and identifying the project as potential

MR DUNCAN: Thank you.

MR P. MILLAR: I'm Patric Millar. I'm the environmental adviser for the project, and I've got previous experience on Sapphire Wind Farm and also an environmental rep for other wind farm projects.

MR DUNCAN: Okay.

MR T. MICHALAS: I'm Tim Michalas. I'm with Partners Group, who is the majority investor in the project through a holding company called Grassroots Renewable Energy. Partners Group is a Swiss investment manager. In addition to my role at Partners Group, where I'm a senior vice-president, I'm also one of the board members of the Crudine Ridge Wind Farm entities.

MR DUNCAN: Thank you.

MS K. ABBEY: Kalya Abbey with Eco Logical Australia. We prepared the environmental assessment for the modification, including the biodiversity development assessment report.

MR DUNCAN: Thank you.

MS C. O'DWYER: Cheryl O'Dwyer, Eco Logical Australia. I'm the ecologist that prepared the biodiversity development assessment report, and I'm an accredited assessor

MR DUNCAN: Thank you. We will now begin. We have about approximately an hour, and I will let you do the presentation, and if we've got questions, we will ask those at the end. Thank you.

MR MOUNSEY: Okay so we've got handouts of the presentation, and it's in line with the agenda that David sent around. So I will just sort of step through my turn.

MR DUNCAN: Right. Thank you.

MR MOUNSEY: So I guess what we would like to go through is – we've done personal introductions. We will do a bit more of an introduction as to who CWP Renewables are, and Partners Group, and our partnership in investing and developing renewable projects in New South Wales, go through what the project is, a bit of the background, and the circumstances that led us to the modification. Then we will go into the modification, and I will sort of perhaps pass through to Kalya and Cheryl to talk a little bit about the biodiversity report at that point - - -

MR DUNCAN: Good.

MR MOUNSEY: - - - and then bring it back to the recommended conditions that have been put forward by the DPE. So, as I mentioned – so CWP Renewables, we've been developing projects in New South Wales now since 2007. We did a prospecting exercise back then looking for potential renewable energy sites across the whole state. The Crudine Ridge site was identified as one of those potential sites from 2007 off the back of a range of criteria, but, obviously, resource was one.

Planning considerations around proximity of dwellings, access to the ridge, proximity to the transmission line and biodiversity, heritage impacts are also key in

that assessment finding. Along with other projects, we've developed the projects through to approval and through to – through financing and into construction.

5 So with our New South Wales focus, we've brought through 383 megawatts of project into operation. Put an asterisk there because, of that 383, 113 is separate to our relationship with Partners Group, but it was a project that CWP Renewables has brought through. The 134-megawatt project that's in construction is the project we're talking about today. That's Crudine Ridge Wind Farm, and we're in the process and hopefully in the matter of four to six weeks away from financing our next project in New South Wales, which is a project just north of Yass called the Bango Wind Farm.

Beyond that, we've got a mix of advanced wind and solar developments that we're bringing through, and they're at various stages of assessment or identification, and then a pipeline of projects that we're again looking to bring through, and our partnership with Partners Group has sort of ring-fenced a number of those projects, including the Sapphire Wind Farm, the Crudine Ridge Wind Farm, the Bango Wind Farm, and our next project after this will hopefully be the Sapphire solar project. Tim, did you want to talk somewhat about Partners Group?

20 MR MICHALAS: Yes. I thought I would actually just give you a bit of background about our approach to environmental, social and governance issues.

25 MR DUNCAN: Sure.

MR MICHALAS: So ESG is a – actually a sort of key pillar of investment strategy across all our investments: so not just infrastructure but investments, real estate investments and debt investments, and we look at everything through the overall screen that all of our assets have to present a net benefit to society. Otherwise, we're not interested in investing, and that's a kind of a pretty fundamental part of our investment approach.

35 We're signatories to the UN Principles of Responsible Investment, and, as a matter of fact, Sapphire, which was the other project we've done with CWP, is a case study on matters like community management which is presented in – by the UNPRI. So that's something we've very proud of internally. On top of that, actually, we have a very particular product called PG Life, which is a – an investment product that is centred around the UN Sustainable Development Goals, and I'm actually really proud to say that Grassroots, which is the parent company of Crudine, was actually the first investment in that product.

45 So I guess the message I would like to leave you with, besides the fact that we're kind of a global, sophisticated investment manager who kind of invests in a lot of infrastructure projects, is we do take ESG issues very seriously; we do take community engagement issues very seriously, and we sort of view ourselves as holding ourselves to the highest possible standards of community engagement and, you know, compliance with planning and codes of conduct, and I think that's

is he aware of any of the issues that have plagued the project incl. APK? tree slaughter/ compliance etc?

something which is, you know, very fundamental to our investment approach, and no different for this project.

MR DUNCAN: Good. Thank you.

5

MR MOUNSEY: Thanks, Tim. Just moving on to the next slide. So let's talk a little bit about the project and somewhat of the time line as well. So, as I mentioned, it's a 134-megawatt project that was financed in May last year, and construction commenced in July-August the same year. Reason we're developing our renewable projects is (1) to meet the national targets and the renewable energy target. New South Wales also has targets under the renewable energy action plan and the New South Wales 2021 plan to meet a 20 per cent renewable target for the state.

15 The project has been developed against the frameworks for assessment at both the New South Wales and Commonwealth level and has been assessed under both of those and been granted development consent under the EP&A Act and approval under the EPBC Act, and, as mentioned in the opening slide, we do have a proven track record of delivery and delivery against a high standard - environmental compliance standard, community engagement standards as well, and we do like to hold ourselves to those bars. So in terms of, again, the background to the project, the site was identified in 2007. Around that time, there was a lot of focus around finding sites that are going to hold the course of time, so that the project sites where the turbines are to be located are not in close proximity to surrounding dwellings.

talk is cheap

25 So that was one of the key considerations, as well as the resource assessment. So in 2008, we installed our first monitoring mast on the site. That allows us to gather on-site data. In early 2011, we commenced the planning process, submitted a preliminary environmental assessment to the department. At that time, the technology around, it was varied, but it was much smaller turbines than we have today. So we began the assessment phase with a project that had 106 turbine locations in it, and that formed the basis for our impact assessment thereafter: so all the hardstands, the roads, the foundation for 106 turbines. As we moved through the assessment phase, we did make changes. You can see that the planning commenced in 2011, but consent wasn't granted till 2016.

35

Over that period of time, not only did we see sort of a quantum leap in technology change, which allowed us to reduce the number of turbines to 77, we also modified the project in terms of the access routes to the site. So, initially, we had an access route that would have come via the Hill End Road north of Mudgee to the project site. but the correspondence received during the public exhibition phase of the environmental impact statement encouraged us to look at alternate routes. So that's how Aarons Pass Road came to be the preferred route to the site. The clearing envelope that was associated with the 106 turbines remained the sort of the clearing envelope that we have provision to offset for, for the project as well, and I think that's around about 104 hectares of impact that was assessed initially.

*well not exactly
EM presented the same range of turbine models to P&A and DOE
to assess at the time forward in the EIA/P&A*

45

-- EM decided to change towards 77 about 7 months after PAC approval (Dec 2016)

The EPBC Act approval came in 2017, and with it came a removal of 20 turbine locations, with a requirement to only build 37 of the remaining 57 turbine sites, and the reasons for the removal of those 20 turbine sites was largely related to impacts on surrounding residences. In December 2017, there were two main events. The - I guess, following the EPBC Act approval, we were ramping up our activity around firming up the site design that we would take forward into construction. That involved a tendering and more detailed design of access routes. So we engaged with a civil contractor to evaluate the road upgrades required for Aarons Pass Road.

incl. the 8 the DPE recommended be removed and which he "had to have"

Involved a lot of consultation with Mid-Western Regional Council to inform the road design that was ultimately put forward into the transport management plan, and also, in December 2017, we secured a PPA, a power purchase agreement, with Meridian Energy, and that allowed us to really underpin the financing process, allow us to move forward with confidence. Through that process of financing, there's a great deal of legal and technical due diligence. I will come back to it a little bit later, but, ultimately, it led to financial closure of the project in May last year and an investment - for an investment of that 270 million. Then we moved into construction in August last year.

270 million - yielding the site

MR DUNCAN: Okay.

MR MOUNSEY: So, in August, we commenced work, and so we started to - our contractors started to clear vegetation along Aarons Pass Road in readiness for the upgrade works that had been included in the design package for the transport management plan. An area of approximately 3.6 hectares had been cleared over the course of the first three kilometres or thereabouts, and that started to raise the concern of the community, and those concerns were brought to the attention of the Department of Planning and Environment's compliance team, which ultimately led to a number of discussions that we had with the Department of Planning around whether or not we were in accordance with the approval that was granted under the development consent.

due to clearing 0.36 ha, it certainly did

The nature of those conversations were around the interpretation of the clearing and whether we were permitted to clear the amount that we were intending to clear at that time on the road, interpretations around some of the language in the consent, such as the generally in accordance with provisions versus the fixed limits that are in the consent for certain vegetation types. Ultimately - and there was also discussions around the concurrency of works. We had again, through our negotiations and dealings with Mid-Western Regional Council, agreed a scope of works whereby we could concurrently upgrade Aarons Pass Road and commence with construction activity on the wind farm site, primarily to reduce the construction period, to run the two in parallel and to have the construction activity reduced in time in totality.

Obviously ME/DPE haven't looked at some photos, details etc for first 3km

"generally in accordance" - CWP/DPE "day to condition"

So those conversations with the Department of Planning at the time were around interpretation largely of the generally in accordance with provisions. We had held a view that, whilst there are set maximums for clearing for certain vegetation types within the development consent itself - and the development consent required us to

I would have thought MWRC could override the consent

is generally in accordance" meant
to be the escape hatch"

not exceed those limits. The generally in accordance with provisions referred back to the environmental impact statement, and the environmental impact statement at large assessed an impact of 104 hectares of impact, for which we were offsetting, and there wasn't a clear allocation, if you like, of where that impact would be. It was – again, we were operating under the generally in accordance with provisions. That mindset, if you like – that penetrated everything that we did. It penetrated the way that we engaged with Mid-Western Regional Council from mid-2016 and going forward, in terms of our road designs and an agreement of those road designs with Mid-Western Regional Council.

fixed
pathway also
other
not exactly how
to run a business

That fed through into our designs that were in the transport management plan. There's a discussion about that consultation activity in the transport management plan and ultimately, in December '17, a sign-off of that transport management plan, which again reinforced our – what we understood to be our understanding of the generally in accordance with provisions, and then, off the back off receiving the power purchase agreement from Meridian Energy, we entered that financing process, and there's a high degree of technical due diligence from an independent consultant on behalf of the lending group, legal due diligence as well, which again reinforced our mindset that this was okay to do because we had an overall clearance for the project that wasn't exceeded.

MR MICHALAS: I might just add to that.

MR MOUNSEY: Sure.

MR MICHALAS: So we, obviously, relied on the exact same suite of due diligence documents, and, not being planning experts as such, one thing that was very attractive about this project is there were no kind of red flags with issues like this identified. So I think, from our point of view, we obviously – I guess what I would like to leave you with is this message that we as an investor and, I think, CWP as a partner are culturally aligned. We're not in the business of trying to push the boundaries of planning consents or anything of that nature. We generally felt that what we were doing under the previous approval regime was adequate for all the reasons Ed has gone through, and, obviously, we find ourselves in this situation because there's a difference of opinion there, but I think just one thing I would like to leave you with is that we certainly did not go into this project at all with the mindset of trying to push the boundaries on planning consents at all. It's simply not the way we operate as an investor.

do your
homework
risk being
low
weigh up the
business risks

MR MOUNSEY: Yes. And I think that's demonstrated through the inclusion of a discussion in the transport management plan as to how we came to believe that, you know, through that negotiation with Mid-Western Regional Council – that we had satisfied their concerns or their design requirements into the road design. So, look, we found ourselves in this position where there was a misalignment in terms of the interpretation of what we thought we could do and what the Department of Planning's compliance team thought we could do in terms of the clearing activity, and, really, we looked at that, and our options narrowed in terms of how to proceed.

T&M mindset
result of SA
mindset

Costs no thought

EM know
Damon would
not just after the
approval – (Ed)
how strange!

So we looked at two or three options, a couple whereby we could stay within the more narrow interpretation of the clearance limits along Aarons Pass Road.

5 One of those options, as outlined in the modification, was the use of a javelin trailer, which would lift the blades round about 45 to 60 degrees on an articulated trailer, and avoid the need for larger swathes of the road design and corner but it would have created a significant amount of tree lopping through the vertical alignment of the corridor. So that was ultimately put to one side. We also looked at could we helicopter blades onto the site because there's a – underlying all of this is a, you
10 know, commercial imperative as well.

We had commenced construction. Funding had flowed to the project, and suddenly we were faced with a delay. Those scenarios were – those options were put to one side too. So it really did leave us in a position of re-assessing the project through a revised road design. **So we did reduce the proposed road clearing in the revised road design and entered the assessment phase of the modification.** I might pause there, and I might – Tim, I might pass to you to talk a little bit about some of the commercial circumstances of where we find ourselves before going back to the modification.

15.7.11 completed that what they did that days in August (3 in Feb) we were then the new Mod plan?

20 MR MICHALAS: Yes. Sure. So, I mean, I think it's – as outlined here, there's a pretty significant financial consequence from stopping the project. So there's obviously debt finance that has already flowed, and there's interest and principal costs that need to be serviced in the meantime. There's site maintenance cost.
25 There's modifications that are being agreed between ourselves and a builder. There's also a lot of stakeholders that need to be managed, particularly our lenders, who are sort of faced with a project that doesn't – has a degree of uncertainty about what the funding envelope is, firstly, and then secondly does require additional costs, and so we've had to make additional funds available for the project.

rather - releasing to mention all those \$5M and looking you had to put it into the public domain to get the sympathy vote

30 So I think just one other message I would like to leave you with is that, as opposed to a lot of other projects, where pre-planning and modification – they're not yet – have not yet reached financial close, we've closed, and, as a result, we've kind of got a train that's already in motion and particularly a finance package that needs to be managed, and so that is likely to create a pretty significant cost overrun to ourselves and sort of discussion with our builder about how we best manage that, but it is something which has led to a pretty significant financial consequence to ourselves, and I think the numbers mentioned here of around \$22 million of cost and up to a kind of 294-day delay are still very indicative and moving around and could actually
40 be quite a lot more onerous.

MR DUNCAN: Okay.

45 MR MOUNSEY: So we turn the page. So the modification as outlined at the start, Peter, is – it addresses two points. One is the re-alignment of the development consent to the EPBC Act approval, which came subsequent to the initial development consent from the State. So that's to reduce the approval from 77 down to 37, and a

defined 37. The EPBC Act approval granted 37 locations from 57. So we've further defined that and – with a view to aligning the documents but also to **give certainty to stakeholders, but**, fundamentally, the core of the modification is around the revised road design, with a view to, you know, avoiding where we can, but also minimising, impacts but making the road passable for turbines that we've selected for this project. That has involved working with our civil contractor, a group called ... and our builder, a lot more engagement, or continued engagement, with the community and council. You know, we had agreed a design with council.

nothing to add

10 We went back and continued to work with council to revise that, and that has included consideration of passing bays, etcetera, and I think that's reflected in the recommended conditions of consent, where there's a revised schedule at the back of the consent, engagement with the OEH and the Commonwealth Department of Energy and Environment over the – how the modification affects the existing approval and then ultimately the impact assessment and the biodiversity development assessment report, which is, I guess, central to the modification, and maybe, with that, I might maybe pass to Kalya or Cheryl to talk a little bit about the methodology applied in the BDAR to – and some of the questions that arose in the consultations with OEH in particular over clarifications of the classifications.

of course it is.

20 MS O'DWYER: Okay. Cheryl O'Dwyer. So I prepared the biodiversity development assessment report, and so Aarons Pass Road is 20 kilometres long. So the initial step was to go out and map all the vegetation type across Aarons Pass Road, so to get an idea of what vegetation communities we have along that length. So we had the development footprint, the clearing indications of what was going to be cleared, so we could have a look at what the impact was going to be, but ultimately – and we've prepared a map book, which Ed has, if you would like to just have a glance at that.

30 So, basically, it just identifies the plant community types, which predominantly is 290, red stringybark, and 277 down on the western end, which is an endangered ecosystem of white box grassy woodland. So, being a road, obviously, you know, there's lot of sections along that road that are quite weedy. There was sections of just phalaris. There was some really nice stands of native vegetation, but there was also a lot of disturbance at ground level.

40 So it has been mapped based on whether the condition of the vegetation was in good condition or poor condition. So we've got it mapped as high and low, and, when we work out the BDAR, we put the amount of vegetations into a calculator, and that gives us an indication of what impact they're having in terms of their credits. So one of the concerns, I guess, and the issues was raised by OEH – was the mapping. So when you actually look at the map, there are sections in there that are pink, which indicate exotic vegetation, but there's clearly native vegetation in the area. So the areal is actually quite an old areal, and that – but that is predominantly canopy from trees that aren't going to be impacted. So they're either on private property, and they hang over the road, or they're on the edge of the road that's not going to be impacted anyway by the development footprint.

So OEH came out just to clarify it, to make sure that they were happy with the way that the vegetation communities had been mapped, and we do have a letter in support to say that they were quite happy with the way that mapping has been produced, that, yes, it is definitely either cleared sections where either actually road verges or exotic
 5 vegetation and the PCTs were mapped accordingly as well. So we also then went along and did some fauna surveys. We know that there have been incidents of koalas being located along that road. So, under the BC Act and the EPBC Act, koalas are listed as a vulnerable species, and there are specific tools that we can use to determine whether the koalas are going to be impacted and how they're going to be
 10 impacted or whether referral to the federal government is required.

So, using those tools, we decided and determined – I decided and determined that there was no need to have a referral to the federal government. It wasn't considered prime koala habitat or considered breeding habitat because of the very few feed trees.
 15 So there is a list of specific eucalypt trees that are required, and there is a percentage cover of eucalypt trees that are required to determine whether it is deemed to be suitable habitat. There's no doubt that koalas probably migrate and travel through the area as a corridor, but it's probably not going to have a huge impact on the population of koalas as a whole. Having said that, they are still listed in the BDAR, and they have been impacted again. So credits have been calculated for the koala in
 20 this BDAR. Similarly for other fauna that was surveyed across the Aarons Pass Road – some powerful owls – we did lots of surveys through pretty much – think about seven nights, looking at - - -

leave to
 1/5/19
 d... ..

25 MS ABBEY: Extensive fauna survey

MS O'DWYER: Yes. It was extensive fauna surveys. We did – we used camera trapping, rather than Elliott trapping, because there's now a lot more research that suggests that, particularly on a linear vegetation strip – that using cameras is a better
 30 indication of fauna that's going to be there, and it's less intrusive to the animal as well, rather than being trapped and handled in little cages. So we were able to use those cameras to verify that there were sugar gliders, not squirrel gliders. So we have documented evidence to support that, and they were sent off to some of our colleagues, other ecologists in the ELA, who have verified that they are definitely
 35 sugar gliders, which are not considered endangered, as opposed to squirrel gliders. Now, they are very similar looking. So we did seek to make sure that they were correctly identified. There is also a number of hollow-bearing trees along Aarons Pass Road, which is considered suitable habitat for a number of bird species.

40 So whilst we did a lot of survey – bird surveys across the whole length, there was a few ecosystem credit species that were found, such as diamond firetails, but they are covered under the ecosystem credits, not the species credit species. So what we're, in fact, left with is a couple of species that we couldn't survey for because it was outside the required survey period, as designated by OEH. So we've just had to
 45 assume that they are present because we can't discredit that they're not there, and we also included the koala because of the historical records that have been found in that location. We also found a couple of scratches on trees which could be koalas or

could be goannas, but we're erring on the side of caution and assuming that they are koalas.

5 So they have also been – credits have been calculated for those – and glossy black
cockatoos, which, due to the hollows, we couldn't assume that they weren't present.
There were also two species of threatened fauna which were found along –
10 threatened flora which were found along Aarons Pass Road, *Acacia meiantha* and
Pomaderris cotoneaster. So, initially, when we did the survey, the pomaderris and
acacia – if they're not flowering, it's very difficult to determine which particular
species your looking at. So I think, in the – in 2011, those particular species were
probably missed and not known to occur there, but when we've come along, we've
found that those species are there, and, initially, we thought that the pomaderris,
15 which is very similar to *reperta*, which is critically endangered – we erred on the side
of caution and wrote the very first initial BDAR based on it being *Pomaderris*
reperta.



We did send a sample off to the herbarium here in New South Wales, and the
specialist at the herbarium wrote a letter stating that, yes, it was *Pomaderris reperta*,
20 but they didn't actually have full flowering material. So they were still erring on the
side of caution. Yes. It possibly could be *Pomaderris reperta*. So we left it at that
until we got some flowering material, and then we sent it off to experts who are
actually revising the whole *Pomaderris* taxonomy, and we sent that off to Neville
Walsh, who works at the National Herbarium in Melbourne, who's the expert in
pomaderris, and he came back and said, "No. This is definitely *Pomaderris*
25 *cotoneaster*," which – it is not listed as critically endangered. It is listed as
endangered. So that reduced the credit calculations for that particular species, based
on the – being critically versus not critically endangered.

30 So I guess some of the mitigation measures that we – so even though – so the impact
on those particular species, we've tried to avoid as many as we can because,
particularly for both of those, it was not known to occur outside this particular range.
So it is a very isolated population. We weren't aware that they occur there. By all
accounts, on all the mapping that you look at, they shouldn't even be there. So we
wanted to make sure that we can protect as many individuals as we can. So we
35 spoke with Ed and the team and said, "Look, we need to actually try to avoid as
many of these as possible." There are a couple – well, there's one pomaderris that
we're – that's not going to be able to be avoided. So that has also been included in
the credit calculations.

40 MR P. COCHRANE: It's one individual.

MS O'DWYER: One individual, but because of the credit calculations and way the
BAM is set up and the calculator is set up, no credits are required for that individual
because it was less than one credit. So they've rounded it down in the calculator, and
45 it's – no credits are required for that one individual. However, what are we going to
do is we're going to look and use this as an opportunity for the individuals that will
be impacted – is to translocate and try and take cuttings and try and establish some –

a research protocol, I guess, to see whether there's some way that we can actually increase the population. So we have come up – so this is in addition to the credits that are required for the offset. So for the 47 individual *Acacia meianthas* and the one *pomaderris*, we're going to try and retain as much vegetation as possible and use that as an opportunity to increase our knowledge on that particular species. So we have a translocation plan which we've written and supplied CWP of how they should actually go about that.

MR DUNCAN: And will you do that within the road reserve, in the corridor?

MS O'DWYER: So that's where we're going to collect the plants from. Our experience is that we're better off actually collecting the material whilst they're doing the - - -

MR DUNCAN: Yes.

MS O'DWYER: - - - work there and taking it off site and striking them in a nursery situation - - -

MR DUNCAN: Sure.

MS O'DWYER: - - - and growing them in a nursery situation and then looking at, in the future, where can we actually re-plant these particular individuals.

MR DUNCAN: Back in this area.

MS O'DWYER: Back into the habitat.

MR DUNCAN: Okay.

MS O'DWYER: Into a suitable habitat.

MS ABBEY: Or potential

MR DUNCAN: Okay.

MS O'DWYER: Yes. Yes.

MR DUNCAN: All right.

MR MOUNSEY: Thanks, Cheryl. So I guess – so the modification we put on exhibition in December and – for a period of two weeks – and I just thought I would sort of step through some of the submissions or some of the statistics from the submissions. So around about 230 submissions, of which 113 support, 100 objected. So a large number of submissions, and, as we exceeded the 25 submissions, that's sort of why we're here with the IPC today, but, drilling into the detail, there are 10 residences along Aarons Pass Road, which is the focus for this modification. Of

5 those 10 residents, eight wrote in support of the modification. One wrote a – what I would call a pretty light-on objection, which was very much focused on dust emanating from the road construction, and one was more of a comment. Regionally, the road is located within Mid-Western Regional Council, but the project is – straddles across into Bathurst Regional Council area as well.

Low money have lease payments to spur on support

10 So within the region, we had 72 support within Mid-Western region for the modification, largely citing a focus on the safer road as a result but an economic stimulus for the region too, and Bathurst Regional Council, a high support again, 86 per cent, again citing economic and environmental reasons for support not only of the road but the project at large. On the other side of the coin, we saw 75 per cent of the opposition to the modification come from an area that was greater than 50 kilometres away from the project and, you know, with high concentrations in the Southern Tablelands and southern part of Sydney.

none of this is applicable since all such benefits are already factored in a TAC time

15 So I guess, over the course of the last four or five months, the department has been assessing the modification and the submissions that have come in and provided the recommended conditions to the IPC mid to late May, and our review of those conditions sort of really focuses in on around four key areas, and it's around updates to the biodiversity management plan, particularly around methodology of calculating and verifying and reporting on the clearance activity proposed along Aarons Pass Road, and that entwines itself with one of the themes that came through in the submissions of distrust towards the developer and development around, "We said we were going to do one thing, but we actually acted to do another."

why not just take from the approval time - still refer to address as in the meeting

20 And that relates to the – I guess the interpretation, again, of clearance activities on Aarons Pass Road, which we talked about before, updates to the transport management plan to ensure that the sequencing of works is not carried out concurrently and ensure that safety is paramount, as I mentioned, the community updates and the methodology for articulating before during and after what it is that we're proposing to do and confirming that we've done it as we said we were going to do and also the compliance with the additional offset provisions that we committed to in the modification which has come through into the recommended consent.

all additional info to developer => intent would also help after the consent

25 And that relates to the – I guess the interpretation, again, of clearance activities on Aarons Pass Road, which we talked about before, updates to the transport management plan to ensure that the sequencing of works is not carried out concurrently and ensure that safety is paramount, as I mentioned, the community updates and the methodology for articulating before during and after what it is that we're proposing to do and confirming that we've done it as we said we were going to do and also the compliance with the additional offset provisions that we committed to in the modification which has come through into the recommended consent.

30 So, looking at all of those items that come through in green text in the modified development consent – recommended development consent, they are – they're pretty light on in terms of detail. It's – you know, it's one bullet point here or, you know, a point here or a revision to a condition. What we thought we would do ahead of this meeting – we've brought examples with us, and I might pass you to Patric in a moment – is to talk through how we've looked at some of these key agencies and have already started to develop draft plans and revisions that would be put forward into any revised biodiversity management plan that we would subsequently submit to the department following determination. So we've grown upon the, you know – the green text already. So can maybe share some of this information.

not in my book the TAC allowed the same detail to be submitted from the weather the "spirit" of Damsel

35 MR MILLAR: So, basically, what we've done to start with within the biodiversity management plan is break out separate sections for Aarons Pass Road. Previously, it

5 was sort of lumped into this is how the clearing is going to be done. So we've – mindful of what Ed has just been saying about impartiality and those sorts of things, we've worked on a process for identifying the clearing, how we're going to measure it, how it reflects the material you've got in front of you that comes straight out of the BDAR, straight out of the assessment process, and we will develop a clearing – just a site disturbance map. That map will then go out into the field and be physically located with surveyors and ecologists, and that will form the basis of a daily – of a chainage table.

obviously none of this was given any thought when CWT commenced in Aug 2012

10 So I'm standing at chainage 100. I know I can clear from 100 to 150, and there's this many trees to come out. That I get done at the beginning of the day, and I get ticked off at the end of the day. At the end of each week, that then gets subject to an inspection by an ecologist and myself, or a representative of the company, to make sure we haven't overstepped the boundaries in terms of the – it's the mark-up, the physical clearing and then the reporting. We've had discussions with DPE about the process, and their compliance staff are happy with it, but then, at the end of the clearing – we're looking at the clearing – the contract is looking at the clearing in a short period of time, a two to three-week period, but when the clearing is done, the clearing is done.

only happening now because CWT/DPE caught with their pants down

20 There's no more clearing. And that reporting gets rolled up into a report, which gets submitted to DPE, to OEH and so on. We're looking to have weekly updates on our webpage, on our Facebook page of this is what we're going to do and this is what we've done, so a week look ahead and a week look behind, and also articulate to the community via both the webpage and the Facebook page what clearing is, how we've marked it out, how we're accounting for it and so on. At the end of the process, it then goes to independent audit, which is one of the consent conditions, and they will be arbiters of whether we've done the right thing or the wrong thing.

30 One of the things that has come up a few times is we've got all these great processes in place, but you still have issues like Albion Park where everything in place cleared. We look at that and say what can we learn from that process? And the thing – the key thing is, starting from the beginning with the contracts, there will be a very – there will be a separate Aarons Pass Road site induction, which will – and the key theme on that is if it's not marked for clearing, you don't clear it. It's that simple. And then talking about how it's marked up, how it's cleared. how we account.

there are more hollow words here than I believe

40 There will be a daily walk down with the plant team, like, the plant operators identifying what's to be cleared, what's not to be cleared, issues such as stockpiling of material can only be done in cleared areas, can't be pushed off to one side. If we're stockpiling mulch material, same thing. It will get stockpiled initially in a cleared area, either cleared as per the consent, or previously cleared as per the pink on the maps you've got in front of you, and then it will be – where it gets used, if it gets used on the Aarons Pass Road for soil stabilisation, that will get signed off by the ecologist and by the site representative from our company.

And at the end of the day, everyone is accountable. We've sat down with the contractor and worked through is this achievable. I suppose we can draw the best of plans, best of conditions, and if it's not achievable in the paddock, it's not achievable. So there's a whole deal of handholding with the contractor. These two ladies will be out on site probably every day along with myself during the clearing process, making sure they don't overstep the bounds. Clearing looks a lot worse than it usually is, having done vegetation consent and compliance in a former life - - -

and do it - that will be required providing they do not keep pushing - at the end of the day it's what the "road" says

then he should know better

MR DUNCAN: Yes.

MR MILLAR: - - - from a state government perspective. You know, it can look a lot worse.

MR DUNCAN: Yes.

MR MILLAR: In terms of - Ed mentioned the community engagement. We've already been talking to our neighbours, talking to the community. We've had two sets of updates via our quarterly newsletters. We've pasted on our Facebook page wording that the IPC meeting was happening, and we just regurgitate exactly off your webpage, and we've had I think six comments on that saying the maintenance works that were done in the last six weeks are great. It's a fantastic road to drive on now. It could be better. And we've had no negative feedback from that process, and we all know that, you know, Facebook is a place for keyboard warriors to stick the knife in and hide behind anonymity. So that's the clearing process and post-clearing.

why do we now need an "expressway"?

In terms of part of the - just on the - part of the issue is what is to be cleared and what isn't to be cleared, and as Cheryl said, there was some discussion from OEH initially about the canopy cover, and we're looking to map out exactly this is where the road is, this is to be cleared, this isn't to be cleared. There will be some pruning involved, some trimming, and that will all grow back. The clearing that has been done so far, and we've back out on site eight months later, it's really suckering back up again now as well. It's a fairly resilient landscape in a lot of respects.

MS O'DWYER: Can I also just jump in and add that as part of the BDAR, even though we know that sections need to be pruned, we've actually in the BDAR used it as that section was going to be cleared, just because we don't know how much pruning an individual can tolerate and whether it's going to cause death in the future, so we took the conservative approach and said that any activity to any vegetation is going to be cleared, but as Patric has said, that some of the vegetation is just going to be pruned and locked.

MS ABBEY: That's right. So we've probably overstated the amount of clearing to an extent.

MR COCHRANE: Is the clearing - it's not really associated with widening the road surface, is it? It's actually widening the available space for the turbine blades to go through. Is that right? Or are you actually widening the - - -

Since the recent regrading, approx
most of APR is about 7m wide
and generally now wider than
most surrounding local roads
- obviously it must be to
provide satisfaction

MR MILLAR: It's a bit of both.

MR COCHRANE: Okay. There's road widening as well.

5 MR MILLAR: In some areas, the road is not wide enough to allow the trailer to swing.

MR COCHRANE: Yes.

10 MR MILLAR: So we've had to widen - physically widen the road.

MR COCHRANE: Yes.

MR MILLAR: In other areas, it's to allow the blade to sweep out behind it.

15 MR DUNCAN: So they will all be relating to curve in some way, either the radius, the outside or the inside of the curve.

20 MR MILLAR: Yes. All that stuff. And when Cheryl was talking about the translocation plan for the acacia and also removal of the pomaderris, we've been backwards and forwards looking for design in that place. Can we move half a metre this way? How does that affect the side slopes and all that sort of stuff? So there has been a lot of thought gone into the engineering side of it to get to where we are now.

So much for that
on p 10 & 16-26
(you're making)

25
This was
after the clearing
- before the
road

MS ABBEY: That's an important point there, Patric. We did the vegetation mapping originally in September, October last year, and following that we worked really closely with Icabed to reduce the amount of vegetation clearing as much as possible, and we made some significant reductions there, looking at the road design.

30 MR COCHRANE: I guess in part the intent of my question was how much is going to be permanently cleared and how much would be just cleared to allow that sweep of blades, and some of it would be - may well recover - - -

MS ABBEY: I think the - - -

35

MR COCHRANE: - - - unless it's actually part of a wider road surface?

MS ABBEY: The object of it is that it is all, like, a permanent disturbance.

40 MR COCHRANE: Permanent. Okay.

MS ABBEY: And I think you need to - the road needs to remain upon, doesn't it, for future maintenance and things?

(Handwritten mark)

45 MR MILLAR: We need to be able to get blades back down at a later date. However, if that involves going around and lopping at the tops of suckers that are that high, that's what needs to happen.

20-22 years
1-1-2027

MR COCHRANE: Yes.

MR MILLAR: Clearing – we had this discussion. What’s temporary clearing?
What’s permanent clearing?

5

MR COCHRANE: Yes.

MR MILLAR: Clearing as defined under the Local Land Services Act is black and
white now. It’s remove, kill, knock over.

10

MR COCHRANE: Yes.

MS ABBEY: Yes.

15 MR MILLAR: That’s clearing, so - - -

MS ABBEY: Yes.

MR MILLAR: There is some temporary clearing to get the swing.

20

MS ABBEY: Yes.

MR MILLAR: But – yes.

25 MR DUNCAN: But the tree lopping is not - - -

MR MILLAR: Tree lopping is out.

MS ABBEY: Yes.

30

MR MILLAR: It used to be in, now it’s out.

MR COCHRANE: Yes.

35 MS ABBEY: But we have considered it as clearing anyway.

MR COCHRANE: Yes.

40 MS ABBEY: Because we’re being conservative there on that approach. We did
actually take an arborist out to site to review the vegetation and get their professional
opinion on whether they thought that it would regenerate or would cause, you know,
long-term decrease to the health of the vegetation leading to the death of the
vegetation, which then meets that Local Land Services Act, and it was unable to
45 make a call either way. You can’t predict what’s going to happen, how a tree is
going to respond - - -

MR DUNCAN: Yes.

how about the precautionary principle?

MS ABBEY: - - - down the track, so - - -

MR DUNCAN: Climate and other issues.

5 MS ABBEY: Exactly. Conservative approach.

MR COCHRANE: How recent are these aerial photos?

MS ABBEY: 2016 is the most recent I could get.

10

MR COCHRANE: So it's even drier now, isn't it?

MS ABBEY: Yes.

15

MS O'DWYER: Yes.

MS ABBEY: Yes. It's also - - -

MS O'DWYER: It has been quite windy out there too, so there's - - -

20

MS ABBEY: It's a windy spot.

MS O'DWYER: A lot of the canopy is probably not there either.

25

MR COCHRANE: More damaged. Yes.

MS O'DWYER: On the day that we were out there with the arborist, there were branches coming down everywhere, so I think that highlighted the change in nature of the vegetation almost on a daily basis out there.

30

MR DUNCAN: All right.

MR COCHRANE: Is all the clearing without the road reserve, it does it - it doesn't extend into any private lands?

35

MR MOUNSEY: Yes.

MR COCHRANE: As often roads aren't necessarily in road reserves.

40

MS ABBEY: Yes.

MR MOUNSEY: No, it does. There's - I think there's - I think it's nine. It's in the modification. I think it's nine freehold landowners that we - their properties are affected.

45

MR COCHRANE: There would be some impact. Yes.

*not good enough
- Sample Earth is better than
nothing - at least it updates data
c. Sept 2018*

*Nothing abnormal
when you come
country - better
than a laptop screen*

*Why doesn't he
bring his own
project?*

X

MR MOUNSEY: And we have agreements. So going back to mid-2016 when we ramped up our activity around the detailed design for the road, it was highlighted to us then that we were going to exceed the existing corridor.

Oh dear! about 1 month after PAC approved (May '16) not to suddenly find out what was presented to PAC (who approved) and it will not work??

5 MR COCHRANE: Yes.

MR MOUNSEY: So we engaged with landowners to understand could we encroach on that land.

Surely (Duncan) well experienced?

10 MR COCHRANE: Yes.

MR MOUNSEY: So we have agreements in place.

could it do that much off track?
with Duncan given poor info to work with to get a 'soft' result to be accepted?

MR COCHRANE: Okay. Great.

15

MR DUNCAN: All right.

MR COCHRANE: I was going to ask about the turbine blades.

20 MR DUNCAN: Yes.

MR COCHRANE: The length of the turbine blades, because I think originally they were 63 metres and they may now be 67; is that correct?

X

25 MR MOUNSEY: I think that's right. It's 135 metre roads, are they? Trying to think what they are.

EM has been on the project from the beginning

MR DUNCAN: Okay.

? type - loads?

30 MR MOUNSEY: Yes.

MR DUNCAN: So the increase in blade length doesn't - is factored into your no clearing requirements?

35 MR MOUNSEY: Yes. Absolutely. It's factored in.

MR DUNCAN: Okay.

40 MR MOUNSEY: Yes. That's right. And it's primarily because of the increase in blade length, which allows each turbine itself to have a greater install capacity per machine.

MR DUNCAN: Yes.

irrelevant/distracting

45 MR MOUNSEY: That allows us to have 37 rather than 106 as originally proposed.

Why this, not the ?? which is what went to the PAC for assessment?

MR DUNCAN: Yes. Yes.

MR MOUNSEY: So that brings us down from 104 hectares of clearing - - -

MR DUNCAN: Yes.

5 MR MOUNSEY: - - - to where we are, including the modification impacts to around about 80 hectares of clearing.

MR DUNCAN: And 37 turbines will still deliver you the 134 megawatt

10 MR MOUNSEY: Yes.

MR DUNCAN: Okay.

MR MOUNSEY: Yes.

15 MR DUNCAN: And that's partly large blades and change of technology, presumably.

*CCWP site presented
in PAC as moderate
wind area -
local request
wind data
for confirmation*

X 20 MR MOUNSEY: Large blades. Change in blade design, but each turbine is a 3.6 machine turbine. And - designed for moderate to low wind sites, which, predominantly, is what New South Wales is. It's not a high wind location. Parts of Tasmania, South Australia. High wind locations. New Zealand is. But as technology has sort of - well, as the projects in those areas have been saturated there has been a movement towards moderate wind sites and the low to moderate wind sites. And the technology has evolved. And larger rotors is a way to capture more energy.

MR DUNCAN: Okay.

30 MR MOUNSEY: Just to come back one of the comments that Patrick was making around the community. In the package information provided we've drafted a new page for the website as well. And there's a template in that package, which will go live at the time of all of the clearing activity along Erin's Pass Road, and that will be regularly updated with the works as proposed, and then the works as completed, and 35 keep the community informed every step of the way.

MR MILLAR: And, again, on that there's how to get involved and how to make a complaint.

40 MR DUNCAN: Yes.

MR MOUNSEY: Yes.

45 MR MILLAR: We've beefed up and reiterated our community complaints process that will be dealt within 24 hours of receipt. There's a one-eight - 1300 number. There's a website, Facebook, in person. We will address them straightaway. If it's

an I don't know like windfarms complaint then we address it. If it's you've cleared too much we can go through and physically monitor on the day.

5 MR DUNCAN: All right, Peter. Anything else?

MR COCHRANE: In your view, the major issues that are raised by – let's say the roughly quarter of the people who commented from the mid-western regional household area – what – their substantive objections – that would be mostly landowners and visual impacts? Their amenity issues. Are there any more - - -

10 MR MOUNSEY: Yes. That - - -

MR COCHRANE: - - - issues that they raise?

15 MR MOUNSEY: Yes. So in the – I haven't brought it with me, but in the front page or pages of the response to submission document - - -

MR COCHRANE: Yes. You've summarised

20 MR MOUNSEY: There is a summary per – there is a summary of – per issues.

MR COCHRANE: Yes.

25 MR MOUNSEY: And the issues related to the modification, being removal of turbines and the - - -

MR COCHRANE: Yes.

30 MR MOUNSEY: - - - the road. The – they have the majority of the favourable responses.

MR COCHRANE: Yes.

35 MR MOUNSEY: The balance of issues relating to aspects largely relate to the windfarm was the majority of the negative submissions.

MR COCHRANE: Who had objected in the past to

40 MR MOUNSEY: Who had objected in the past. Correct. Yes. So that's within the preamble of the response to submissions document.

MR COCHRANE: But they're the more substantive issues, I guess, that have been raised – changed from before

45 MR MOUNSEY: No.

EM at his dangerous level!!

since he includes noise/visual at all in his Mod applic is he not surprised some objections are going to raise their head

he seems to forget that a lot of "support" he received have got their tongues hanging out



MR COCHRANE: - - - change to those fundamental objectives.

MR MOUNSEY: No. I mean, fundamentally, there's sort of key milestones in the project's development. As I said from the start, I've been involved from day 1 in -
 5 you know, conversations with some of the key objectors in there - you know, around their kitchen table. And the - you know, the key concerns along the way were around, you know, the visual impact and the property value.

p 19 225

MR COCHRANE: Yes.

10

MR MOUNSEY: That's a common concern for wind farms. Which then led to, you know, looking at the project from the perspective of do we want this project to go ahead? So, you know, the initial feedback around the EIS for the hill and road entrance - that was met with objection, even though the - even though the road itself
 15 would be of net benefit to the community. So, in our response, we've moved to Aarons Pass Road. And that was off the back of further consultations with the like of Downer Group and Icubed.

But those same objections applied there, despite at the time the commentary being,
 20 "Well, why don't you upgrade this road? It's a terrible road." You know? So - and then we move to the point where we've got - we're granted the development consent from the New South Wales Government. And we've made reductions around the turbine numbers at that time, moving them further away from some of the localised objectives to the process of being evaluated against the EPBC Act. And
 25 fundamentally, the impacts relating to the EPBC Act, at least the vegetation impacts, were located midway along the transmission line - - -

MR COCHRANE: Yes.

MR MOUNSEY: - - - and within the final three or four kilometres of Aarons Pass Road. There was actually no EPBC Act impacts within the wind farm site itself. Yet again the consultation activity resulted in certain turbines being moved from certain viewpoints. So it's been a - it's largely - it's quite a binary discussion.

MR COCHRANE: Okay. Thank you. I've got no more questions.

MR DUNCAN: Okay. I don't have anything further I think we're there.

MR COCHRANE: Okay.

40

MR DUNCAN: Is there anything else you want to say to wrap up?

MR MOUNSEY: Well, look, I guess it's in the summary page of the presentation. I mean, we've sort of found ourselves in this circumstance unintentionally. You
 45 know? We've followed a path where we and the industry and everyone that participated in all the due diligence along the way and all the consultation activity along the way believed that we were on the right path.

is this for road?

5 It's through compliance and, I guess, hindsight valuation of our approach where we've come unstuck, if you like. But we were of the mind and everyone else involved in the project was of the mind that we had the permits in place to go ahead and construct the project; otherwise, Partners Group wouldn't have funded, the banks wouldn't have funded. And we would - and the EPC contract, it wouldn't have signed the contract.

hand surprised the locals

look before you leap

10 So we find ourselves in a circumstance that we're trying to get ourselves out of as quickly as possible. We are suffering through the delay. And that has a commercial impact, but it's also having an impact on those in the immediate area that aren't necessarily benefiting from the project. I think generally there is a consensus that the upgrade to the road will bring about benefit, particularly a much safer road in the long run. And that's recognised by council. And I think that's adopted by us through our approach to construction as well.

They want if get their money

15 You know, we won't be constructing the road concurrently with the wind project. We will build the road. We will have the road signed off. Then we will move into the construction of the wind farm. So there are wider economic benefits to the region. And I think broadly as well, hopefully if you get the opportunity to digest the package of information we've provided today, which, again, it's in a draft format, so welcome feedback. But hopefully it goes to demonstrate that we are ready to recommence the work. We're wanting to recommence the work. We're wanting to put in place those safeguards. Hopefully it goes towards providing you guys with assurance that we are responsible and we can deliver this project in accordance with the development concern.

ultimate responsibility

hasn't exactly got much choice

is he saying things been naughty?

25 MR DUNCAN: Thank you. Well, we note your comments today and we will be out on site next week and a public meeting and meet with council and actually look at the site as well. And I assume you will be there at the site meeting as well.

30 MR COCHRANE: Well, someone from - - -

MR MOUNSEY: Well, I will ask David if you would like us to be.

35 MR D. KOPPERS: At the public meeting.

MR DUNCAN: Okay. Well, and we will deal with it as appropriately and as efficiently as we can.

40 MR MOUNSEY: Okay.

MR DUNCAN: Thank you.

MR MOUNSEY: Appreciate it. Thank you very much.

45 MR DUNCAN: Thank you. Okay.

RECORDING CONCLUDED

[1.32 pm]

CRITIQUE OF TRANSCRIPT

Submitted by : O. ROWLAND-JONES
PYRAMUL



AUSCRIPT AUSTRALASIA PTY LIMITED

ACN 110 028 825

T: 1800 AUSCRIPT (1800 287 274)

E: clientservices@auscript.com.au

W: www.auscript.com.au

TRANSCRIPT OF PROCEEDINGS

TRANSCRIPT IN CONFIDENCE

O/N H-1034749

INDEPENDENT PLANNING COMMISSION

MEETING WITH DEPARTMENT OF PLANNING AND ENVIRONMENT

RE: CRUDINE RIDGE WIND FARM MOD 1

PANEL: PETER DUNCAN
PETER COCHRANE

ASSISTING PANEL: DAVID KOPPERS

DEPARTMENT OF
PLANNING AND
ENVIRONMENT: MIKE YOUNG
STEVE O'DONOGHUE
NATASHA HOMSEY

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

DATE: 11.44 AM, WEDNESDAY, 5 JUNE 2019

MR P. DUNCAN: Good morning. Thank you for coming in. Before we begin, I would like to acknowledge the traditional owners of the land on which we meet, the Gadigal people. I would also like to pay my respects to their elders, past and present. Welcome to the meeting today on the proposal whereby CWP Renewables, the
5 applicant, is seeking to modify the approval of the Crudine Ridge Wind Farm to reduce the maximum number of wind turbines from 77 to 37 to align the development consent with the Commonwealth approval under the Environmental Protection and Biodiversity Conservation Act and also to revise the road design for Aarons Pass Road and associated increasing vegetation clearing by approximately
10 5.05 hectares.

My name is Peter Duncan. I'm the chair of the panel – this panel today. Joining me is my fellow commissioner, Peter Cochrane. The other attendees of the meeting are David Koppers, from the secretariat of IPC, Mike Young, executive director of the
15 department, Steve O'Donoghue, director of the department, and Natasha Homsey, also from the department. 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 provided and made available on the commission's website as usual. The meeting is one part of the commission's decision-making process. It is taking
20 place at the preliminary stage of the process and will form one of several sources of information upon which the commission will base its decision.

It's important for the commissioners to ask questions of attendees and to clarify issues whenever we consider it appropriate. If you're asked a question and you're
25 not able to answer, please feel free to take the question no notice and provide any information in writing which we will then put on our website. We also request – or could I also request that members here today introduce themselves before speaking for the first time and for all members to ensure they do not speak over the top of each other to ensure accuracy of the transcript? Thank you for coming in and we will now
30 begin. Over to you, Mike.

MR M. YOUNG: Thank you, Peter and Peter.

MR DUNCAN: Yes.

35 MR YOUNG: My name is Mike Young. As you've indicated, I am the executive director of Resource Assessments and Compliance at the Department of Planning and Environment. Thank you for having us today to talk about the proposed modifications to the Crudine Ridge Wind Farm. You would have our detailed
40 assessment report of the modification, so I don't propose to go through that in a lot of detail and certainly I would be happy to answer specific questions that you may have on that, but I will, I guess, outline some of the background, some of the context for the project and some key aspects of our assessment findings and then we can perhaps have a discussion or if you've got any questions on that going forward.

45 MR DUNCAN: That's good. Thank you.

MR YOUNG: So the Crudine Ringe Wind Farm was approved by the former planning assessment commission. I think it was in 2016, following a full and comprehensive assessment process involving the usual sorts of public consultation processes both by the department and by the Planning and Assessment Commission at the time. CWP Renewables is the proponent for the project. They are, obviously, a renewables energy – renewable energy company that do have a number of projects within New South Wales that have been either constructed or approved or seeking approval. So they're a relatively large player in the renewable market in New South Wales.

The Crudine Ridge Wind Farm was originally approved under the state legislation with 77 turbines. The project required approval also at the Commonwealth level under the EPBC Act, a separate approval, and for various reasons that I won't go into now that the Commonwealth governor or the Minister for the Environment at the Commonwealth level, Josh Frydenberg at the time, approved the project, but only with 37 out of the 77 turbines that were approved under the state jurisdiction. Hence, I think that's one of the key modifications to the approval or the state approval of that – that CWP Renewables is proposing to make so that it aligns then with the state approval and the Commonwealth approval both with providing 37 – the ability to construct and operate 37 turbines on the site.

So that's some of the – the, I guess, approvals history. 77 turbines, obviously, there was other ancillary aspects to the project, including a transmission line and various road upgrades. In particular, a road upgrade for Aarons Pass Road, which was the key access road to the site. I think you've got it there even on the first page of the report there, showing Aarons Pass Road as the main access point from the Castlereagh Highway. So the approval was granted in 2016.

There's various management plans, etcetera, required under the state approval. Those were submitted and approved and CWP Renewables then, in the middle of last year, around August last year, as I understand it, commenced construction of the wind farm and, in particular, commenced some clearing activities on Aarons Pass Road to enable the agreed upgrades to be constructed to allow – which would then facilitate the access to the site by the over-dimensional vehicles via Aarons Pass Road.

That was subject to section 138 approval under the Roads Act by the Midwestern Regional Council. At that time, the community raised some concerns about the nature and extent of the clearing and whether it was fully consistent with the approved or the approval for the project. From a compliance perspective, the department investigated that matter and lost – the department considered there was no non-compliance with – at that stage. It was clear that the amount of clearing, if it continued to occur along the other parts of Aarons Pass Road, may well exceed the amount of clearing that was envisaged in the original assessment for the project and, as a result of those investigations, CWP voluntarily stopped clearing along the road and hasn't recommenced that clearing since August of last year.

which
part of the
or

see compliance
requirements for
DPE for project
(historical data
1/1/19)

only after being told about it

100 P. method
5
to some
concerns if 2nd
stage of work
didn't stop
10
a stop order
would be
issued

Beas.
due to the address
station in Jan 19
- wait til the
4th or turn up!

Attached to that also, there was some concerns about construction commencing on the site itself at the wind farm and the department also undertook a compliance investigation in that regard and actually fined the company for commencing construction of the wind farm itself, as the conditions required Aarons Pass Road upgrades to be completed prior to construction on the site itself and, based on a voluntary undertaking, the company has also ceased construction of the wind farm itself. So, apart from maintenance activities on the site, CWP Renewables has ceased construction of the wind farm now since, I think, before Christmas. So almost six months now, which brings us, I guess, to our – if that's kind of clear from a background perspective, Peter and Peter?

MR DUNCAN: Yes. Yes.

? I assume
Thomson
20

MR YOUNG: Which brings us to, I guess, the modification and the process we went through in that regard. So it was as a result of those compliance activities and those concerns raised by the community, it was clear that the company either needed to design the road such that it would meet the clearing limits or – not limits, but the amount of clearing envisaged in its assessment or, if it was unable to do that, that it would lodge then a modification to potentially increase the amount of clearing in order to design the road to facilitate the access to the site, and that's obviously what they have elected to do, is lodge a modification application. We exhibited that earlier in the year. We received 242 submissions.

25 The majority of those were supporting of the modification, really, for reasons such as improving road safety, because the roadworks would improve certain aspects of Aarons Pass Road and, obviously, economic and social sort of benefits associated with the construction and operation of a large-scale wind farm. We did receive, I think – I think it was 98 objections. Is that correct? 98 objections raising a range of concerns, some of which relate to the approval of the original project and others
30 which relate to, you know, the concern about clearing more vegetation along the road and also concerns about the reduction of the number of turbines on the site and claim that that would also reduce biodiversity impacts.

35 So there was a range of concerns raised in those objections. The department also held a community information meeting during its assessment process, in Pyramul Hall, which I think is where you're proposing to have your meetings shortly, and so we did, I guess – we feel that we've undertaken detailed consultation. We've visited the site. We've met with some individual landowners who had concerns who lived close to the proposed windfarm, and we've captured those concerns and, we believe,
40 addressed those concerns in our assessment;

water
blade length
ok

45 At the end of the day, really, the fundamental aspect of the modification is really to allow a road design that is capable of enabling the oversized and overdimensional vehicles, particularly the turbine blades, to access the site and a recalibration, I suppose, of the road design and the associated clearing that's going to be necessary in order to facilitate that. Now, the company has indicated that it has – it has worked with engineers and ecologists to minimise the amount of clearing, and so we believe

should discuss
with local
15-20 pin

14/7 obviously not aware the other came to light about Jan 2016 (EM saw the light that Dawson would be back about 1 month after PAC approval 2016)

is EM treating DPA/PAC as mushroom?

that the original assessment indicated that that clearing ought to not exceed about one and a half hectares, and the company, I think, originally, when this issue came to light last August, said that they would need to clear up to 11 hectares, but, through a detailed design process with, as I said, engineers, including council and ecologists, they've been able to propose a design that is around six and a half hectares.

So around about a five-hectare increase from what we say is what the original assessment envisaged in terms of the area of clearing. So in terms of additional impacts associated with the modification, really, we're talking about five hectares of additional clearing along Aarons Pass Road. That was the idea between, I guess, largely what was approved and what now they're seeking approval. Obviously, they're reducing the number of turbines, but that's a reduction of impacts, as opposed to an increase in impacts. So that's really the main change that they're making. So I guess our view is that, you know, through consultation or considering their assessment and liaising with and seeking advice from Office of Environment and Heritage, the assessment indicates that the additional clearing would not result in any significant impacts on threatened species or EECs and, whilst there would be some impacts on other communities, that those impacts are not so significant that the modification ought not to be allowed to proceed.

Obviously, if the application is not approved, then it does mean that - it does make it very difficult for the future of the - the ability for the proponent to deliver the project because, essentially, they're saying that to have a compliant road design, they need to clear, essentially, the six hectares, and they can't reduce it any more, and during - the other aspect that's important to note is that, during the assessment of the original project, they looked at a number of other options to access the site. Those other options were - also had their own issues, either with noise adjacent and disturbance of residence, some fundamental problems with certain types of crossings.

So they would need to do upgrades or various sort of bridges and other infrastructure, and there was also - and council's position was that they favoured the Aarons Pass Road as the best option, amongst others, and that, subject to upgrading to address some aspects of the road design, the lack of suitability of the current road, then that was the best option. So I guess, you know, we consider that the additional five hectares in the scheme of the assessment and allowing the project to proceed is not unreasonable.

And, of course, in accordance with the offsetting policies in New South Wales, there would be an obligation to offset those impacts of the additional five hectares of clearing, and, as part of the original approval, there was a very large land-based offset required to be set aside for conservation purposes, I think, of 674 hectares or thereabouts, and my understanding is that the - that that's locked in, and they're proposing to offset in addition - or propose additional offsets to that which was already approved to offset the additional five hectares. One of the concerns of the community was that they - that the reduction of 40 turbines and then the associated reduction in clearing and other impacts associated with that would be used as a basis for then offsetting the clearing on the road.

As what's another idea matter?

the power finally making up

As it doesn't fit into the scheme of things

admitting - RWT a deal if they don't get approval

DPA might think as best locals. Consider reducing the little bit of remaining environmental heritage to be important

MR DUNCAN: Right.

MR YOUNG: And we've made that clear. And, certainly, in our recommendations is that that be treated separately, in the sense of the five hectares along the road
5 should be offset separately, in addition to the existing offsets.

MR DUNCAN: Okay.

MR YOUNG: So, look, I think, in a nutshell, that's, I guess, the basis of our
10 assessment. We also do note that there are a number of people who put in
submissions and, indeed, presented at the community information session who did
raise concerns about the need to ensure road safety and the need to ensure that the
road is upgraded to be safe prior to its construction recommencing and that, whilst
15 there would be some additional clearing – that the road safety aspects and the access
to the site to facilitate the development of the project were things that outweighed
those concerns about the additional clearing. So, whilst there has been a long history
to this project and, you know, a relatively large number of submissions, both for and
against, for the modification, we consider it actually boils down to some fairly simple
20 issues for the consent authority to determine, which is really is it reasonable to allow
an additional five hectares of vegetation along the roadside to be cleared to facilitate
the development and to improve road safety for the local residents in the community.

MR DUNCAN: Okay. Thank you. *all already done now - road safety*
no longer an issue

MR YOUNG: Did you have anything else you wanted to add?

MR S. O'DONOGHUE: Not really. I guess the only other – in terms of – Steve
O'Donoghue, director of resource and energy assessments. Just in terms of the
offsetting as well, there is – apart from the vegetation, there is offsetting
30 requirements for species, impacts on a number of species ecosystem credits under the
BC Act, which we've already incorporated into the conditions of – recommended
conditions for the project as well, just to point that out.

MR DUNCAN: Okay. Thank you.

MR YOUNG: So there are a couple of threatened species – individual threatened
species, plants, along the road, and there's obviously some concern of some members
of the community about that.

MR DUNCAN: Yes.

MR YOUNG: OEH has been out there to look very carefully at that with their
ecologists, and, for one of those species, we're looking at a translocation and a
transplantation program. One of the other species, that's probably not suitable. So
45 there would be a direct impact on that species.

MR P. COCHRANE: Well, that is highly localised.

MR YOUNG: Highly localised and - - -

MR COCHRANE: It only occurs in a 70-metre area

5 MR YOUNG: That's right. That's right. And there was some debate about, you know, what the actual species was, and, you know, whether it was a locally – local version of the species, etcetera, but OEH essentially looked at those things and, in the scheme of things, considered that the clearing of those individual plants would not result in a significant impact on the particular threatened species.

10

MR DUNCAN: Good. Thanks, Mike. Just a clarification on the road safety issue that was brought up. Is it the current road safety, during-construction road safety or post-construction road safety?

15 MR YOUNG: All of the above.

MR DUNCAN: All of them.

MR YOUNG: Yes.

20

MR DUNCAN: So there's obviously a concern about the road is not safe now.

MR YOUNG: Correct.

25 MR DUNCAN: Okay. So there – some people see it as an opportunity.

MR YOUNG: Yes.

30 MR DUNCAN: And it's the most important aspect for the project for them.

MR YOUNG: Yes.

MR DUNCAN: Okay.

35 MR YOUNG: Indeed.

MR DUNCAN: Okay.

40 MR YOUNG: Our view, obviously, is we need to manage the construction period and then, obviously - - -

MR DUNCAN: Yes.

45 MR YOUNG: - - - the operational period - - -

MR DUNCAN: Yes.

can what?
project to go ahead?
project to fall over?
to get \$\$ out of it?
nothing to stop it -
PAC (DOE) approval
- only needed to think to
the rules!

MR YOUNG: - - - and I guess both the council and us, you know, we – and, obviously, the local residents are of the view that it needs to be upgraded for those purposes, but there is the tangential benefit or the benefit that would happen regardless of the project.

considering the large no. of birds, few turned up at the appraisal

5

MR DUNCAN: All right. Peter, do you have some questions?

MR COCHRANE: I notice the biodiversity credits are largely a result of the fauna species, I think, rather than the flora, even though the flora figure quite large in the assessment report, and they must be, presumably, dependent on hollows as well. A number of those species would be, and I'm – the assessment report says there's 150 hollow-bearing trees that would be removed. So I'm just wondering do we know what proportion of the overall total that is. Is that a very large proportion of the available hollow-bearing trees, or is it a small proportion?

10
15

MR O'DONOGHUE: We would have to get that information for you too - - -

MR COCHRANE:

MR O'DONOGHUE: - - - the total number of – total number of trees, but it's driven – it's largely driven by the area, rather than the habitat trees per se. So it's the condition – in terms of doing – running the calculator - - -

is that the "Little Britain" computer approach?

MR COCHRANE: Yes.

25

MR O'DONOGHUE: - - - it's – the number of hollow-bearing trees doesn't come into it. It's more the conditions they – of the community, and the type of community sort of drives the species credits.

MR YOUNG: And whether those particular vegetation communities are potential habitat for those particular species, as opposed to them being present, and therefore, on that basis, part of the credits that need to then be retired include both ecosystem and then species credits.

MR COCHRANE: Yes. Right.

MR O'DONOGHUE: I think, in this – for three of the species here, they're included because they – the surveys were undertaken outside the area. So, from a conservative point of view, they assume that the species were present, but they weren't observed in any surveys because it was outside – outside the season.

MR YOUNG: I should say that part of the issue and part of the recommendations in our – the conditions that we would seek the consent authority to impose involve quite detailed surveillance of the clearing activities, you know, in the sense of ensuring that, you know, where possible, things get locked instead of cleared, where hollow-bearing trees can be avoided, that they are avoided, that there is a revegetation process, there's an offsetting process.

45

? DPE negligence, time
passed since?

5 And there's also strict parameters around ensuring that they record and calculate and monitor the area of clearing so that it's no greater than what was approved and so that's going to be one of the challenges for the compliance aspect of this, you know, post, you know, the construction period to ensure that those matters are adhered to, and that the company adequately demonstrates that to the satisfaction of the department that those things had been properly done.

Why wasn't that done pre 2 Aug 2008?

Why wasn't DPE aware that what was proposed wasn't in place pre 2 Aug?

10 MR DUNCAN: Sure, and I guess the way they clear it too by leaving some of the material behind and things like that, that sort of - - -

MR YOUNG: Yes.

MR DUNCAN: The one on figure 5 sort of just taking it all out, but, you know, there could have been things left on the ground and stuff like that, I suppose

15 MR YOUNG: I think once you visit the site, you will see that there's actually a lot of material been left on the ground.

MR DUNCAN: Is there? Okay.

20 MR YOUNG: Yes, yes, for those purposes.

MR DUNCAN: Yes. Okay.

25 MR YOUNG: But there is - there's a whole process where they go through and do pre-clearing surveys to look at whether there's any particular fauna present.

MR DUNCAN: Okay.

30 MR YOUNG: Whether they can - if there are fauna present, do they need to capture those and then, you know, release them elsewhere and manage that, and in terms of tree hollows, etcetera, there would be a requirement to establish suitable habitat through leaving certain material behind on the site, you know, etcetera, and replanting.

35 MR DUNCAN: Okay. Good. Good. Peter?

MR COCHRANE: Okay. I mean, seeing the site will be the - - -

40 MR DUNCAN: Yes. I think it's important for us to see the site.

MR YOUNG: Yes. I think you will - yes. Yes.

MR COCHRANE: What's the length of the turbine blades? Are they 75 metres

45 MR YOUNG: No. So - - -

*Load upgrade not necessary for blades,
not necessary to EM consent*

MR COCHRANE: not that long?

MR YOUNG: The original indication was that they would be, I think, 63 metres.

5 MR COCHRANE: Okay.

MR YOUNG: There is a concern that – anecdotally, that the company is proposing to increase those to 67 metres. Now, the consent doesn't regulate the length of blade. It regulates the height of the turbine at 160 metres, so my understanding is there's no change of 160 metres, but within reason, you know, companies, when they're developing these wind farms, you know, if the blade length does alter marginally, it's not something that the department would seek to regulate or we could consider those minor changes in blade length to be generally in accordance with what was approved. Now ---

generally in accordance with EA and POC not VAC conditions

even less than half a metre could make or break transporting these things

MR COCHRANE: But, of course, it's blade length that determines the road-clearing requirements.

MR YOUNG: Well, no. I don't think the issue of four metres on a 67 metre blade – 63 or 67 metre blade with a truck and low loader, etcetera. It's something you could ask the company in terms of the difference, but the additional five hectares is not as a result of the ---

MR DUNCAN: The blades.

MR YOUNG: Of slightly longer blades.

EA and POC seem to have opposite opinions re proposed making p19 2.25-26

MR COCHRANE: Just on that, the reduction in turbines, is there – is it necessary to have a modification for that issue alone or is that simply ---

MR YOUNG: Well, they could seek to – they're essentially removing, wanting – seeking it to remove a development right.

MR COCHRANE: So it ---

MR YOUNG: To put it beyond doubt.

MR COCHRANE: Okay. So that's them – that's the applicant really clarifying the situation.

*is it stretching this a bit?
IF signal off m37 EM confirmed by email that 37 was max.*

MR YOUNG: That's right.

MR COCHRANE: Okay.

MR YOUNG: And we're supportive of that in the sense of it does provide certainty for all stakeholders that this is all that there are – and there's no inconsistency between the different jurisdictions.

MR COCHRANE: So an opportunity in this modification - - -

*one difference in this case
being more addition of
that approval*

MR YOUNG: Now, arguably, they would need to comply with both approvals, in which case, in practice, they would only be able to construct 37 turbines.

5

MR COCHRANE: Yes. Yes. Okay. Okay. So, you talked – in the assessment report, mentioned the – there was a possible question of the reduction of clearing because of the smaller number of turbines playing into this for the road clearing, but the EBPC – according to the assessment report, the EBPC rejection, if you like, of the 77 was on social and amenity impacts, not on - - -

10

MR YOUNG: That's right.

MR COCHRANE: - - - clearing.

15

MR YOUNG: That's right.

MR COCHRANE: So it's a kind of different issue.

20

MR YOUNG: Yes.

MR COCHRANE: Do you know what's on the ridge, what is being cleared? It must be woodland of some sort.

25

MR YOUNG: Well, once you see the site, you will see that it's the – the site for the wind farm itself is largely cleared. There are clearing involved with both the turbines, the cabling between the turbines, the access tracks and the transmission line, but both the planning assessment commission and the Commonwealth – well, certainly the Planning Assessment Commission approved on the basis of 77 turbines and the appropriate offset for that being that 674 hectare offset. The issue of the potential impacts on biodiversity, particularly in regard to matters of national environmental significance, so those EBPC listed species, was not something that was determinative in the reduction of turbines. It was clearly for social and amenity impacts on nearby neighbours.

30

35

MR COCHRANE: Yes.

40

MR YOUNG: There is a question as to – or it would be fair to say that, under most assessments done at the Commonwealth level, it focuses on matters of national environmental significance, which are obviously listed there, being mostly biodiversity in this case, and it's not typical that a decision would be made at that level for grounds other than potential impacts on matters of national environmental significance.

45

MR COCHRANE: No. That's interesting.

MR DUNCAN: It is interesting.

*did MY do the
conclusion?*

5 MR COCHRANE: And the – so the submissions on this revised – or comments on this revised proposal don't seem to be as strong a set of objections to the revised project. So there's a difference between, I guess, the number of people that presumably objected to the 77 and those that are now kind of comfortable enough with the

10 MR YOUNG: Well, although that – I agree. That being said, the local residents who were very concerned about the original proposal and who, as a result of the removal of 40 turbines, would arguably have significantly less impacts – amenity impacts on them ---

MR COCHRANE: Yes.

Handwritten note: All advice seems to get it - if EWP and DVE played straight they'd have had to object to

15 MR YOUNG: --- have still and are still objecting to the current modification.

MR COCHRANE: Okay. Right. Because there seems to be quite an aggregation of houses more to the north of the project site.

MR YOUNG: Yes. Yes.

MR COCHRANE: By looking at the – where the sort of buildings are. I'm assuming they're residents. It's not entirely clear, but I would presume that that's ---

25 MR YOUNG: The majority of concerns being expressed in terms of local residents to the proposal tend to be to the – directly to the west of the project.

MR COCHRANE: To the west. Okay.

30 MR YOUNG: Not to the north.

MR COCHRANE: Okay. Because there's a few to the east as well.

35 MR DUNCAN: So over this – on ---

MR YOUNG: Correct. On Sallys Flat Road.

MR DUNCAN: Diagram on figure 3, that area there.

40 MR YOUNG: Yes. That's correct.

MR DUNCAN: And they – I assume they look back ---

MR YOUNG: That's correct.

45 MR DUNCAN: --- towards the site. Yes.

Handwritten notes:
Some -
...
is Mr Young to
Also focus away
from north -
of the 40 houses
along A/C (socially)
most are likely
on land lease and
EWP with EWP -
if 40 houses in
plan they can't
object

MR YOUNG: And so where you had the turbines all the way along that string - - -

MR DUNCAN: Yes.

5 MR YOUNG: - - - obviously, there's a cluster of turbines that has been removed and a number of those properties, obviously, were very concerned at the time.

MR DUNCAN: Yes.

10 MR YOUNG: But they remain - they continue to object to the current modification.

MR DUNCAN: Okay. And the compliance action, is that all complete?

MR YOUNG: It's complete in the sense of - - -

15

MR DUNCAN: At every level, like Commonwealth or anybody else involved?

MR YOUNG: Commonwealth has taken no compliance action, as far as I'm aware.

20 MR DUNCAN: Okay. Okay.

MR YOUNG: It's complete in the sense of we're not proposing to take any further action unless there is reason to do so. However, at some point, the undertakings that the company has given to not commence construction will need to be lifted, I suppose, but we would see that would be - those undertakings are contingent upon having upgraded Aarons Pass Road.

25

MR DUNCAN: Next steps.

30 MR YOUNG: Yes.

MR DUNCAN: And the compliance action was for that issue of starting work before the roadworks were done.

35 MR YOUNG: On the site. Yes.

MR DUNCAN: Yes. Yes.

MR YOUNG: That's right.

40

MR DUNCAN: Yes. Okay. I don't think I have any other questions, Peter. We really need to see it onsite and have the meeting. David, anything from your point of view?

45 MR D. KOPPERS: No.

MR DUNCAN: Okay. Unless - - -

*M.Y. offered
no reason -
to should have
by now that
Duncan should play
by the book
did M.Y. check?
I not why not
surely he wouldn't
want another
granade going off?*

MR COCHRANE: Sorry. One last question. Do we know the additional biodiversity credits that are listed because of the road clearing? Do we know what they – the specific requirement for that is they would need to just do that subsequently or - - -

5

MR YOUNG: Yes.

MR COCHRANE: - - - does that need to be in place before - - -

10 MR YOUNG: No, they've got the conditions. They can retire those credits within two years - - -

MR COCHRANE: Two years. Okay.

15 MR YOUNG: - - - of recommencing construction or from commencing construction, which was – where they started last August.

MR COCHRANE: Okay. All right. That's - - -

20 MR O'DONOGHUE: Which I think is consistent with the current conditions in terms of these – it does take time to go through a process of securing those and then putting the necessary arrangements in place.

MR COCHRANE: Yes. Okay.

25

MR DUNCAN: Great. Well, unless you've got something further, I think that's it.

MR COCHRANE: No, that's it.

30 MR DUNCAN: We will close the meeting at that stage. Thank you.

RECORDING CONCLUDED

[12.14 pm]