Nonowie Wind Farm

Application Number: **02862** Commencement Date: **07/04/2025** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Nonowie Wind Farm

1.1.2 Project industry type *

Energy Generation and Supply (renewable)

1.1.3 Project industry sub-type

Wind Farm

1.1.4 Estimated start date *

03/09/2029

1.1.4 Estimated end date *

30/12/2061

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

Tilt Renewables DevCo Pty Ltd as trustee for Development Hold Trust (**Tilt Renewables**) is proposing to install up to 148 wind turbine generators (WTG) and associated infrastructure approximately 10 kilometres (km) west of Whyalla in South Australia (**Proposed Action**). The Proposed Action Project Area (**Project Area**) and surrounds is rural, currently used for sheep grazing.

The purpose of the Proposed Action is to help reduce Australia's carbon footprint by generating up to 1,200 megawatts (MW) of clean energy needed to power new industries in South Australia. The connection to the national electricity network will be via a direct cut-in to ElectraNet's Eyre Peninsula Link, or via a new 275 kilovolt (kV) overhead transmission line to the existing Cultana substation (**Optional External Transmission Line**) (**see Section 1.2.2-1.2.5**).

The Project Area is approximately 22,500 hectares (ha) in size, with majority of the land tenure Crown Land under perpetual lease with one leaseholder, and one freehold parcel.

The Proposed Action will consist of WTG and associated infrastructure including substations, access tracks, transmission lines, underground cabling and operations and maintenance facilities. It is naturally bisected into a north and south area by the Lincoln Highway which runs east-west through the Project Area and connects with Middleback Road. This has allowed the Proposed Action to be designed with staged development optionality should this be required, with a substation and BESS located in each.

The Proposed Action has been subject to an ongoing and iterative design process with consideration of the mitigation hierarchy. The Proposed Action includes consideration of the **Project Area** (approx. 22,500ha) and a defined **disturbance footprint** (approx. 1,150.91ha) to represent impacts that will occur as a result of the Proposed Action (**see Att 1**). No infrastructure or disturbance will occur inside the **avoidance area** (approx. 511.7ha) within the Project Area.

The Project Area is heavily constrained, particularly concerning the placement of WTG. The constraints include Electromagnetic Interference (EMI) links, existing utilities, hydrology and aviation protected zones. These constraints, along with construction and technical considerations, have directly informed the Proposed Action design. The avoidance area includes land associated with an existing heritage agreement and significant environmental benefit in the southwest corner of the Project Area, where no infrastructure or disturbance will occur. When defining the avoidance area, additional constraints (i.e. EMI links) could not be included. Although WTG placement is already restricted by these constraints, they have not been included in the avoidance area as ancillary infrastructure (i.e. access tracks) traverse these areas.

The Proposed Action includes:

- Up to 148 WTG and associated infrastructure distributed into two areas:
    - North – approx. 77 WTG
    - South - approx. 71 WTG.
- WTG are three-bladed, variable speed, pitch regulated machines with a rotor and nacelle mounted on a cylindrical steel tower.
- Maximum overall height of the WTG (to blade tip) of up to 250m with a tower/hub height of approx. 160m, with an approximate blade length of up to 90m and the minimum distance of the tip of the blade to the ground being 40m.
- Overall electricity generation capacity of approx. 1,200MW.
- Each WTG sited within a hardstand area of approx. 80m x 40m.
- Up to two BESS's (approx. 400m x 250m) located near each of the north and south substations, each consisting of multiple modularised battery and inverter units, with:
    - Up to 300MW capacity
    - Storage of up to 8 hours
    - Total area of approx. 20ha.
- Internal access tracks of up to 10m carriageway width, linking infrastructure and to provide access to/from public roads.
- Underground 33kV transmission cables and fibre optic cabling.

- Overhead 275kV transmission line (approx. 8km), comprised of up to two circuits on either lattice towers up to 65m tall or steel or spun concrete monopoles, spaced roughly 300-650m apart (depending on tower type).
- Substations, operations, and maintenance facilities consisting of:
    - Total area of approx. 11ha
    - Two permanent 33kV/275kV substations, one in the north (approx. 250m x 200m) and one in the south (approx. 200m x 200m)
    - Two Operations and Maintenance Facilities (approx. 100m x 100m) including buildings, car park and workshop/warehouse.
- One permanent switchyard (approx. 300m x 200m) located adjacent to the north substation.
- Up to 10 permanent meteorological masts up to 160m and constructed at WTG hub height.
- Two main temporary construction compounds up to 200m x 300m and located close to the main entrances into the north and south clusters, including:
    - Site office/staff facilities
    - Amenities
    - Workshops
    - Car parks.
- Optional temporary workers accommodation of up to 500m x 320m (16ha in area) used to house workers for the duration of construction and may include:
    - Housing units
    - Common areas (i.e. dining and recreation)
    - Sanitation facilities
    - Car parks
    - Site office.
- Borrow pits to provide construction material, with indicative locations selected based on initial geotechnical investigations. Further assessment is required to assess the suitability of these locations.
- Approx. 11 temporary laydown areas, including:
    - Two internal transmission line laydowns approx. 150m x 100m, adjacent to the transmission line.
    - Five bench laydowns approx. 100m x 100m, adjacent to the substations, switchyards and BESS.
    - Four WTG laydowns, three approx. 100m x 300m and one approx. 150m x 200m, located across the Project Area.
- Satellite areas (approx. 40m x 80m), located across the Project Area adjacent to access tracks, with a total area of approx. 26ha.
- Optional temporary concrete batching plants of around 100m x 100m (if concrete is not sourced offsite).
- For transport of the wind turbine blades from either the Port of Whyalla or the Port of Adelaide to the site access points, there will be minimal vegetation trimming and/or removal to allow for access of oversize and overmass wind farm components along the delivery route. This primarily includes vegetation trimming within Whyalla to allow for blade oversail clearance but may also include vegetation removal at site access points into the Project Area. Vegetation impacts associated with the transport of blades will be confirmed once the delivery route is selected.

Tilt Renewables estimates that construction of the Proposed Action would commence in late 2029 and be completed late 2032. The expected commercial life of the Proposed Action will be approx. 30 years, with decommissioning to occur following the cessation of operations.

Construction

Pre-construction works will be undertaken where such activities will have no adverse impact on MNES or habitat, including pre-clearance surveys, establishment of monitoring programs, mobilisation of plant/equipment, materials and machinery. Pre-construction works will occur post-approval to inform detailed design. These works would be undertaken without triggering commencement of the Proposed Action.

The construction phase of the Proposed Action is likely to occur over approx. 36 months. Works during construction would be in accordance with relevant environmental plans and management measures to ensure environmental impacts are appropriately managed. Construction would commence with site preparation and establishment, upgrade and/or construction of internal access tracks and remaining civil works (i.e. preparation of hardstand areas and laying of cable to allow for delivery of components and servicing). This would be followed by concrete and steel reinforced foundation preparations. Public road upgrades would be completed concurrently with a restricted commencement of road use and the commencement of on-site construction works.

Operations

During operations, WTG and supporting infrastructure would require regular inspection/maintenance. During the initial operating years, operator attendance may be more regular while operation is being optimised. Regular scheduled maintenance is required generally at three, six and 12 month intervals. It is possible that major unexpected or unscheduled maintenance could take place during the life of the Proposed Action. All operational works would occur in accordance with operational management plans that would be developed during detailed design.

Decommissioning

Decommissioning after the expected commercial life of 30 years would involve dismantling and removing the above ground wind turbine components and related infrastructure, covering and rehabilitating access roads and foundations. Decommissioning would involve reinstating similar road access arrangements to construction and would require access for large cranes and vehicles to dismantle and remove the WTG. Internal access roads may be retained where requested by the landowner.

The decommissioning period is likely to be around 12-18 months, with significantly fewer truck movements than during construction. Rehabilitation activities are designed to reintegrate any disturbed area with surrounding land and existing vegetation to a condition similar to that prior to construction, to ensure it is safe, stable and non-polluting. A rehabilitation program will be implemented, and periodical site monitoring will be undertaken for up to two years following decommissioning to ensure rehabilitation is successful in the longer term.

The clearance of up to 1,150.91ha of vegetation (partly considered suitable habitat for several EPBC Act listed threatened species) will potentially impact on MNES under the EPBC Act. A Significant Impact Assessment (**SIA**) has been prepared to support the EPBC Referral and incorporates results from work carried out to date (**see Att 2**). The SIA summarises key findings from the Ecological Impact Assessment (**see Att 3**), Flora and Fauna Assessment (**see Att 4**) and the Bird and Bat Utilisation Summary Report (**see Att 5**) which includes four seasonal bird and bat utilisation surveys since spring 2022 across two years.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

Yes

1.2.3 Is the proposed action the first stage of a staged development (or a larger project)?

No

1.2.4 Related referral(s)

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1.2.5 Provide information about the staged development (or relevant larger project).

This referral includes consideration of infrastructure included within and associated with the Nonowie Wind Farm Project Area (including WTG, BESS, access tracks, internal transmission lines and cabling, etc.) and connection to the existing Eyre Peninsula Link within the Project Area. This referral **excludes** consideration of the Optional External Transmission Line (**OETL**), a potential future grid connection connecting the Nonowie Wind Farm switchyard to the nearby Cultana Substation if the grid capacity of the existing Eyre Peninsula Link is determined to be insufficient for the Proposed Action in full. If a decision is made to progress the OETL, it would be subject to separate consideration under the EPBC Act at a later date.

The preferred grid connection option for the Proposed Action is via a direct cut-in to the existing Eyre Peninsula Link within the Project Area. Tilt Renewables is currently working with ElectraNet to determine the cut-in capacity of the Eyre Peninsula Link for the Proposed Action and is simultaneously undertaking a suite of technical environmental assessments to determine the impact of grid connection being via the OETL. It is likely that the OETL, should it proceed, would be constructed and operated by ElectraNet under commercial arrangements with Tilt Renewables.

The OETL would be located on Native Title land of the Barngarla Determination Aboriginal Corporation (BDAC). In parallel to discussions with ElectraNet regarding the grid capacity of the Eyre Peninsula Link, consultation with BDAC commenced in late 2022 and has been ongoing throughout development of the Proposed Action and consideration of the OETL.

As the OETL is a component of the development that may not proceed and is likely to be undertaken by a third-party entity, a decision has been made for them to be considered under the EPBC Act separately. Preliminary ecological surveys and assessments of the OETL have been undertaken, with additional technical investigations to be undertaken following any decision to proceed with the OETL.

Optional External Transmission Line - Preliminary ecological investigations

Tilt Renewables has engaged Umwelt to undertake an ecological impact assessment of the OETL to identify impacts and provide recommendations for mitigations. In its current form (based on current preliminary design and ecological investigations), and without the implementation of mitigating measures, the OETL may have an impact on the following:

- Clearance of approximately 37 ha of native vegetation representing habitat for EPBC Act listed threatened species, namely the Western Grasswren (Vulnerable) and Southern Whiteface (Vulnerable).
- *National Parks and Wildlife Act 1972* (NPW Act) listed threatened species, namely the Australian Sandalwood (*Santalum spicatum).*

It is acknowledged that the OETL Project Area adjoins the Project Area and that there is potential for some widespread and locally common MNES species (such as the Western Grasswren (*Amytornis textilis myall)* and Southern Whiteface (*Aphelocephala leucopsis)*) to occur across both areas. However, due to the close geographical proximity of the OETL with the Proposed Action, and with cumulative impacts on MNES to be considered in the OETL detailed ecological assessments, it is unlikely that consideration of the referred action and related action separately would result in a different outcome than considering both aspects together.

Once sufficient detailed information is determined for the OETL (including agreed design in partnership with BDAC and ElectraNet and construction and timing details), a referral under the EPBC Act will be submitted for the OETL. The OETL referral will consider any potential cumulative impacts determined to be relevant at that time (including the Proposed Action).

Split referral justification

Whilst it is acknowledged the referred Proposed Action and the OETL are related actions, there is sufficient justification as to why each part can be considered as separate actions, without reducing the ability to undertake an appropriate assessment and achieve the objectives of the EPBC Act in line with *EPBC Policy*

Statement: Staged Developments – Split referrals: Section 74A of the EPBC Act (Department of Sustainability, Environment, Water, Population and Communities, 2013) as per the below:

- **Can the referred action stand alone and are the referred action and related actions co-dependent?**

Construction and operation of the Proposed Action is standalone and could proceed independently to the OETL. The OETL may not be required and is a potential option for grid connection for the Proposed Action. The Proposed Action assumes that grid connection will be via direct cut-in to the existing Eyre Peninsula Link.

- **What is the timeframe between the referred action and the related action?**

Determination, investigations and partnerships for the OETL corridor are substantially less advanced than the Proposed Action, supporting the appropriateness of submitting split EPBC referrals. It is expected that construction of the Proposed Action would commence prior to the OETL (if deemed to be required).

- **What is the geographical relationship between the referred action and the related action?**

The OETL is geographically distinct from the Proposed Action Project Area and could be assessed on a standalone basis consistent with the objects of the EPBC Act. The OETL would connect the Nonowie Wind Farm switchyard (within the Project Area) to the Cultana substation (outside the Project Area). An approximately 6km corridor for the OETL would be located within the Project Area, directly adjacent to the existing Eyre Peninsula Link. Additionally, an approximately 16km corridor for the OETL would be located outside the Project Area and is geographically distinct (**see Att 6**).

- **Is there an overall plan or vision for the larger action and does that plan encompass the referred action?**

There is no overall plan or vision relevant to this Proposed Action and related action. As described above, the Proposed Action assumes that grid connection will be via direct cut-in to the existing Eyre Peninsula Link and is therefore stand-alone.

- **Are the actions authorised by a single local government or State/Territory permit, licence or other authorisation?**

Both the Proposed Action and the potential OETL are located within South Australia and will seek approval under the *Hydrogen and Renewable Energy Act 2023* (HRE Act). The HRE Act allows for six types of approval licences, with the Proposed Action to be regulated under a Renewable Energy Infrastructure Licence and the OETL to be regulated separately under an Associated Infrastructure Licence. Justification for separating the referred action and related action state authorisation is consistent with that of the EPBC split-referral justification and rationale.

- **Will the action be financed from a single funding source?**

If deemed to be required, the OETL may be funded from a separate source and, as is commonplace for renewable energy developments, is likely to be owned and operated by the relevant transmission network service provider. In this arrangement, it is preferable that the approval documentation for the OETL is separate to the Proposed Action, as ongoing management and compliance of the Actions would be undertaken by separate entities and separately funded.

Tilt Renewables is confident that allowing a split referral for the Nonowie Wind Farm and OETL is appropriate and does not reduce the ability of DCCEEW to achieve the objects of the EPBC Act.

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

Commonwealth legislation applicable to the Proposed Action

Environment Protection and Biodiversity Conservation Act 1999:

An assessment of the direct and indirect impacts of the Proposed Action against the EPBC Act Significant Impact Guidelines 1.1 (Department of the Environment, Water, Heritage and the Arts (DEWHA), 2013) determined that the construction and/or operation of the Proposed Action will likely have significant impacts on MNES. A detailed SIA was undertaken for all species identified in a Protected Matters Search Tool (PMST) report that are known or likely to occur within the Project Area, including one Threatened Ecological Community (TEC), 45 threatened species (comprising 2 plant species, 33 bird species, 3 mammal species, 4 reptile species, 1 fish species and 2 shark species) and 40 Migratory species (comprising 30 bird species, 5 mammal species, 3 reptile species and 2 shark species, noting that 25 of these species also had a threatened species listing, leaving a total of 15 species with a migratory only listing).

Refer to **Att 2** for the SIA.

Native Title Act 1993 (Native Title Act):

Searches of the South Australian Native Title Vision Web Map for information relating to the current Native Title status of the Project Area were undertaken, which identified that the Project Area is within the Barngarla Determination Aboriginal Corporation (BDAC) Native Title claim area (Tribunal file no. SCD2016/001; Federal Court Number SAD3011/1998). However, the Federal Court determined that Native Title does not exist on the Proposed Action Project Area.

State legislation applicable to the Proposed Action

Native Vegetation Act 1991 (NV Act):

The Proposed Action requires Native Vegetation Clearance approval to clear 1,150.91 ha of native vegetation. A clearance application will be prepared and submitted under the *Native Vegetation Regulations 2017* (Regulation 12(34) – Infrastructure) in due course.

Hydrogen and Renewable Energy Act 2023 (HRE Act):

The HRE Act came into effect on 11 July 2024 and creates a new approval and regulatory regime for hydrogen facilities, renewable energy projects and batteries, as well as a new access, approval, and regulatory regime for renewable energy projects on Pastoral Lease lands and in State waters.

The HRE Act allows for six (6) types of licences. The relevant licence for the Proposed Action is the Renewable Energy Infrastructure Licence, which is intended to support the construction, operation and decommissioning of renewable energy projects.

Tilt Renewables is currently preparing a Renewable Energy Infrastructure Licence application to the Department for Energy and Mining for the Proposed Action. The application is expected to be lodged in Q3 2025.

National Parks and Wildlife Act 1972 (NPW Act):

Under the NPW Act it is an offence to take a native plant or protected animal without approval. Threatened plant and animal species are listed in Schedules 7 (Endangered species), 8 (Vulnerable species) and 9 (Rare species) of the NPW Act. Fourteen species listed as threatened under Schedule 8 of the NPW Act have been recorded within the Project Area or have been assessed as likely or highly likely to occur within the Project Area. Persons must comply with the conditions imposed upon permits and approvals. Flora and fauna surveys conducted for the Proposed Action have been conducted under the required flora collection permit.

Landscape South Australia Act 2019 (LSA Act):

A water affecting activity permit is likely to be required for the Proposed Action for construction of access tracks across creek lines. Tilt Renewables have committed to standard sediment and erosion control procedures as part of the environmental management plans which will ensure that actions will not alter the natural flow of water due to the Proposed Action and mitigate against sediment and erosion occurring, particularly around creek lines.

Several Declared Weeds exist in the Project Area. As part of environmental management plans, Tilt Renewables will employ standard weed hygiene procedures to ensure that Declared Weeds are not transported to the Project Area or throughout the Project Area.

Animal diseases may be present within the Project Area. Strict hygiene measures will continue to be employed and will be enforced through the construction and operational environmental management plans throughout the life of the Proposed Action to ensure that animal diseases are not spread due to the action.

Aboriginal Heritage Act 1988 (South Australia) (AH Act):

The AH Act is the principal legislation protecting and preserving Aboriginal heritage in South Australia and is administered by the Attorney Generals Department – Aboriginal Affairs and Reconciliation (AGD-AAR). Under section 23 of the AH Act it is an offence to damage, disturb or interfere with an Aboriginal site, object or remains without prior authorisation from the Minister for Aboriginal Affairs.

No AGD-AAR listed Aboriginal heritage sites exist within the Project Area. All Aboriginal heritage sites are protected under the AH Act, whether reported/registered or undocumented. Therefore, if a previously unknown Aboriginal heritage site is discovered during works and cannot be avoided, Ministerial authorisation under section 23 of the AH Act will be required. Although not mandated by the AH Act, a number of management options have been recommended to mitigate the assessed heritage risk. These include implementation of an Aboriginal site discovery procedure, site inductions and archaeologists on call to identify potential discoveries during construction. In addition, Tilt Renewables is engaging with the BDAC to seek agreement on the direct management of Aboriginal heritage associated with the Proposed Action, regardless of the Proposed Action not being proposed on Native Title land.

Heritage Places Act 1993 (Heritage Places Act)*:*

The Heritage Places Act seeks to make provision for the identification, recording and conservation of places and objects of non-Aboriginal heritage significance. No State Heritage Places or Areas have been identified within the Project Area during historic heritage investigations undertaken to date.

Crown Land Management Act 2009 (Crown Land Act):

The Crown Land Act provides administrative procedures for the efficient handling of Crown Land transactions, encourages fair and transparent decision making in the allocation of unalienated Crown Land, and provides a system for the management of Crown Land that achieves a balance between the social, economic and environmental needs of the community. Prior to starting any works on Crown Land within the Project Area, a Works Plan will be submitted to the Minister for Climate, Environment and Water for written approval.

Policy Documents

The construction and operation of the Proposed Action's direct and indirect impacts to MNES were assessed against EPBC Act related guidelines, as shown in **Att 2**. This includes the Significant Impact Guidelines 1.1 – Matters of National Environmental Significance (Department of the Environment, Water, Heritage and the Arts, 2013), the EPBC Act Policy Statement 2.3: Wind Farm Industry (Department of the Environment, Water, Heritage and the Arts, 2009), Survey guidelines for Australia's threatened birds (DEWHA, 2010), Survey guidelines for Australia's threatened bats (DEWHA, 2010) and EPBC Act Policy Statement 3.21 Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species (Department of the Environment and Energy, 2017).

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

Significant consultation with the community, stakeholders and First Nations has occurred since 2022 and is ongoing. Consultation has been guided by an overarching Stakeholder and Community Engagement Plan. The Plan is periodically updated and aligns with industry best practice and the International Association for Public Participation's (IAP2) core values.

Consultation aims to:

- Build awareness of the Proposed Action.
- Establish relationships with key stakeholders including approval agencies.
- Provide the community and First Nations with an opportunity to provide feedback on the Proposed Action and influence the planning and design.
- Start benefit sharing discussions.

Consultation to date has focused on direct neighbours, the regional community, residents of Whyalla and Cowleds Landing, First Nations and key stakeholders. Key consultation activities undertaken to date include:

- Ongoing consultation and meetings with host landholders.
- Early pre-project announcement engagement with BDAC.
- Proposed Action (Project) website launch (**Nonowie Wind Farm – Tilt Renewables**).
- Electronic and physical distribution of newsletters, providing updates and inviting feedback and engagement with the Project/Proposed Action process.
- Community drop-in sessions (undertaken in July 2024 in Whyalla).
- Meetings and phone calls with Whyalla City Council, local MPs, neighbours, community members, businesses and proponents in the area.
- Doorknocking of neighbours and Cowleds Landing residents.
- Release of fact sheets and concept mapping.
- Local radio station interview to publicise the Proposed Action (ABC Whyalla).
- Establishment of a Goods and Services Register, to encourage local procurement.

Collaboration with a range of service organisations to identify sponsorship and grant opportunities has already occurred for the Proposed Action and will be ongoing throughout development, construction and operation. To date, the Proposed Action has supported the following initiatives:

- Whyalla Business and Tourism Annual Awards and Dinner.
- Whyalla Sleepout Fundraiser.
- Whyalla Wellness Weekend.
- Whyalla Mens Shed.
- 'The Haven' Centacare.

While the level of contact with the community has remained high, the level of interest in the Proposed Action has been low. General discussion points that arose during consultation with the community include:

- Environmental management.
- Employment and business opportunities.
- Future engagement opportunities.
- General and specific questions about the Proposed Action.

Tilt Renewables has retained a high level of engagement with the host landholder directly associated with the Proposed Action throughout development. The landholder has regular contact with Tilt Renewables regarding development of the Proposed Action on their land and have had input into the basis of design to ensure compatibility with their ongoing property management requirements and aspirations.

In March 2025, Tilt Renewables received approval of the first 'Reflect' Reconciliation Action Plan (RAP). The Reflect RAP supports the goal to be the partner of choice for First Nations peoples, customers, communities, and suppliers, fostering a collaborative environment that benefits everyone involved. Under

the Reflect RAP Tilt Renewables are seeking to strengthen First Nations involvement in our supply chain and increase staff cultural competency and form genuine, mutually beneficial partnerships with First Nations peoples across the operational life of all projects

Consultation with BDAC commenced in late 2022 via email. In those communications, Tilt Renewables offered BDAC an opportunity to discuss how BDAC and the Barngarla People would like to be involved in the Proposed Action, noting that Native Title does not exist on the Project Area, and provided Proposed Action briefings and newsletters thereafter.

An in-person meeting was held with Tilt Renewables and BDAC on 6 May 2024 and 6 April 2025 to discuss the Proposed Action and the heritage matters relating to the Barngarla People. In December 2024, a Memorandum of Agreement was executed between Tilt Renewables and BDAC to commence the preparation and process of entering into a Project Agreement for the purposes of the Proposed Action (and the OETL relevant action).

Tilt Renewables will continue consultation with BDAC and the Barngarla People throughout the approvals process and during the construction phase of the Proposed Action, to ensure involvement of the Barngarla People in line with any future agreements with Tilt Renewables with the aim of protecting Aboriginal cultural heritage.

Tilt Renewables has engaged with local, State and Commonwealth government departments on more than 10 occasions since 2023 including Whyalla City Council, State Department for Energy and Mining, State Department for Environment and Water, Office of Hydrogen Power South Australia, State Department of Trade and Investment, Federal Department of Climate Change, Energy, the Environment and Water, Federal Department of Defence and Federal MP’s.

It is noted that further to the above agency engagement, Tilt Renewables has had technical communications with third parties as relevant for the Proposed Action. These organisations include but are not limited to ElectraNet, SA Power Networks, SA Water, Northern Water, Eyre Peninsula Landscape Board, GFG Alliance (and associated entities), Renascor Resources Ltd, Alligator Energy and Fortescue. Discussions with these parties have been centred around technical design aspects of the Proposed Action and potential interactions with third party assets. Tilt Renewables has considered the technical consultation as part of the development of the Proposed Action and has not identified any aspects which may affect the overall viability of the Proposed Action throughout this consultation.

Consultation with the community, stakeholders and BDAC will continue through the approvals phase.

1.3.1 Identity: Referring party

Privacy Notice:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

The Department of Climate Change, Energy, the Environment and Water (the department) collects your personal information (as defined by the Privacy Act 1988) through this platform for the purposes of enabling the department to consider your submission and contact you in relation to your submission. If you fail to provide some or all of the personal information requested on this platform (name and email address), the department will be unable to contact you to seek further information (if required) and subsequently may impact the consideration given to your submission.

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1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN	52637320597
Organisation name	TILT RENEWABLES DEVCO PTY LTD
Organisation address	3000 VIC

Referring party details

Name	Sia Niakolas
Job title	Environment and Development Planner
Phone	0460325196
Email	sia.niakolas@tiltrenewables.com
Address	Level 24, 600 Bourke Street, Melbourne, Victoria, Australia

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details

ABN/ACN	52637320597
Organisation name	TILT RENEWABLES DEVCO PTY LTD
Organisation address	3000 VIC

Person proposing to take the action details

Name	James Beckett
Job title	Manager, Environment and Planning
Phone	0419631905
Email	james.beckett@tiltrenewables.com
Address	Level 24, 600 Bourke Street, Melbourne, Victoria, Australia

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

Yes

1.3.2.16 Describe the nature of the trust arrangement in relation to the proposed action. *

Tilt Renewables DevCo Pty Ltd (ABN 52 637 320 597) is proposing the action in its capacity as the corporate trustee of the Development Hold Trust (ABN 99 292 065 889).

See Att 7 - Trust Deed (please note that this document is confidential / sensitive and should not be shared publicly).

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

Environmental management history

Originally part of New Zealand based company, Trustpower, which had its beginnings in 1924 as a local power authority and has been active in Australia since 2001, Tilt Renewables was established in October 2016 as the result of a company demerger. In August 2021, Tilt Renewables' Australian business was acquired by PowAR, an influential renewable energy platform dedicated to driving large-scale renewable energy projects across Australia.

Tilt Renewables has a strong track record developing wind and solar energy facilities in Australia and New Zealand, including wind farms across Queensland, New South Wales, Victoria, South Australia and Western Australia, and solar farms in New South Wales. Tilt Renewables has an existing asset base of 480 operating turbines across nine wind farms as well as 2,066,380 installed solar nods across two solar farms, with a total installed capacity of 1,822 MW. Tilt Renewables' pipeline of renewable energy proposals has the potential to produce more than 2,900 MW of additional renewable generation capacity.

In this respect, Tilt Renewables:

- Uses and, in many instances, modifies natural resources to generate electricity.
- Owns, maintains and enhances/expands a network of significant physical resources.
- Supplies an essential service to commercial and domestic consumers, which in turn enables these parties to provide for their social and economic well-being.
- Contributes to the decarbonisation of the Australian economy.

Tilt Renewables aims to operate in a manner that maximises potential positive environmental effects, while minimising the incidence and source of negative (or adverse) environmental effects. In order to achieve this, Tilt Renewables' actions that may affect the environment are governed by Tilt Renewables' Environmental Policy (**see Att 8**).

Tilt Renewables is committed to sustainability and ensuring that we uphold our corporate responsibility to our people, environment, the community, and our investors. The company recognises the need to balance business growth and investor returns with protecting and enhancing the environment, the safety and well-being of our people and the communities in which we operate. Tilt Renewables has a Sustainability Policy that ensures the principles of sustainability are embedded in everyday decision-making and operational processes, as well as our long-term corporate plans and strategies. The Tilt Renewables Sustainability Policy is provided in **Att 9**.

Past and present proceedings under laws

The Palmer Wind Farm Project was approved by the Mid Murray Council's Development Assessment Panel in December 2015. The approval decision was subsequently appealed at the South Australian Environment, Resources and Development Court (ERD Court). On 7 March 2018, the ERD Court made judgement to uphold the approval, subject to additional conditions. Following this decision there was a South Australian Supreme Court Appeal of the ERD Court decision and a hearing was held in February 2019. The Supreme Court delivered the judgement on 15 November 2019 to uphold the decision of the ERD Court to approve the Palmer Wind Farm Project.

Previous EPBC Act referrals

Tilt Renewables, and its associated subsidiary companies that are trading as Tilt Renewables, have the following EPBC referral currently under assessment under the EPBC Act:

- Waddi Wind Farm (Waddi Wind Farm Pty Ltd) - EPBC 2023/09639: Controlled action currently being assessed by way of Preliminary Documentation.

This current application has associated historic referrals and/or EPBC Act Approvals, with the current referral assessing changes and updated design parameters relevant to the proposed project.

Other historical EPBC Act referrals and controlled action decisions by related body corporates include:

- Liverpool Range Wind Farm (Tilt Renewables Australia Pty Ltd) – EPBC 2022/09416: Approved subject to conditions.
- Palmer Wind Farm (Tilt Renewables Australia Pty Ltd) - EPBC 2024/09884: proposed action is not a controlled action.
- Rye Park Wind Farm (Rye Park Renewable Energy Pty Ltd) - EPBC 2020/8837: Approved subject to conditions.
- Dundonnell Wind Farm (Dundonnell Wind Farm Pty Ltd) - EPBC 2012/6657: Approved subject to conditions.
- Salt Creek Wind Farm (Salt Creek Wind Farm Pty Ltd) - EPBC 2016/7763: proposed action is not a controlled action.

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

Tilt Renewables is committed to protecting the environment by incorporating environmental considerations into all decision making and to manage its operations in a legally compliant and environmentally responsible manner. The environmental principles that Tilt Renewables is committed to under its Environmental Policy are extracted below:

- Consider the environmental context for development, construction and operations activities and seek to minimise the environmental impacts of Tilt Renewables' operations.
- Comply with applicable legal obligations and any related planning and environmental approval conditions for each project/asset.
- Implement systems, standards and processes to enable all activities to be carried out with regard to Tilt Renewables' environmental principles, including regular reviews to continually improve environmental performance.
- Keep abreast of trends in technology, regulations and community attitudes, adapting and innovating in response to a rapidly changing society, including planning for climate change.
- Develop measurable environmental objectives and targets (through a risk-based approach to environmental management), including regular reviews to continually improve Tilt Renewables' environmental performance.
- Communicate and promote environmental awareness and work with stakeholders to ensure positive environmental outcomes and minimise the risk of operational environmental incidents.
- Engage quickly and effectively to respond to environmental incidents should they occur.
- Appoint capable people with appropriate skills and experience to carry out their work in a manner that is compatible with sound environmental performance.
- Provide adequate resources, equipment and training to enable employees at all levels to fulfil their responsibilities in relation to the environment and their work practices.
- Adopt measures to identify and ensure the efficient use of resources and energy, and minimisation of emissions and waste.

(**See Att 8**).

As part of the principles of the Tilt Renewables Sustainability Policy, the company seeks to protect biodiversity and nature, among other environmental, social and governance objectives. Tilt Renewables undertakes to monitor and minimise our impact on nature and biodiversity while ensuring compliance with relevant legal obligations and standards. Tilt Renewables commits to best practice biodiversity and nature management through our site-specific management plans relevant to the biodiversity and nature values of each site in which we work.

(**See Att 9**).

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

Yes

Proposed designated proponent organisation details

ABN/ACN	52637320597
Organisation name	TILT RENEWABLES DEVCO PTY LTD
Organisation address	3000 VIC

Proposed designated proponent details

Name	James Beckett
Job title	Manager, Environment and Planning
Phone	0419631905
Email	james.beckett@tiltrenewables.com
Address	Level 24, 600 Bourke Street, Melbourne, Victoria, Australia

1.3.4 Identity: Summary of allocation

Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

ABN/ACN	52637320597
Organisation name	TILT RENEWABLES DEVCO PTY LTD
Organisation address	3000 VIC
Representative's name	Sia Niakolas
Representative's job title	Environment and Development Planner
Phone	0460325196
Email	sia.niakolas@tiltrenewables.com
Address	Level 24, 600 Bourke Street, Melbourne, Victoria, Australia

Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	52637320597
Organisation name	TILT RENEWABLES DEVCO PTY LTD
Organisation address	3000 VIC
Representative's name	James Beckett
Representative's job title	Manager, Environment and Planning
Phone	0419631905
Email	james.beckett@tiltrenewables.com
Address	Level 24, 600 Bourke Street, Melbourne, Victoria, Australia

Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? *

No

1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? *

No

1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

1.4.7 Has the department issued you with a credit note? *

No

1.4.9 Would you like to add a purchase order number to your invoice? *

No

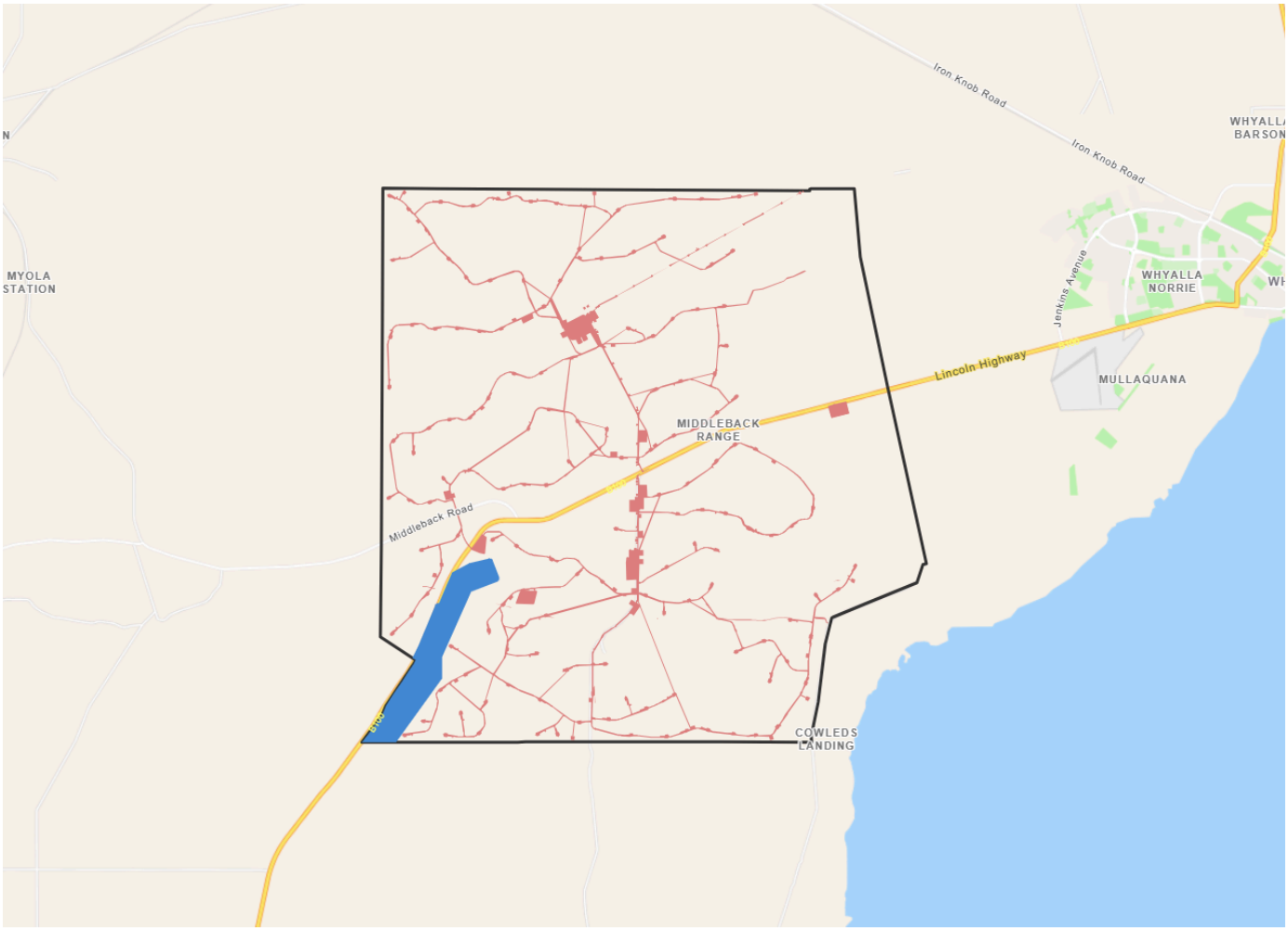
1.4 Payment details: Payment allocation

1.4.11 Who would you like to allocate as the entity responsible for payment? *

Referring party

2. Location

2.1 Project footprint



Project Area: 22828.79 Ha **Disturbance Footprint:** 1150.92 Ha **Avoidance Area:** 511.74 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

Lincoln Highway, Middleback Range, 10 km west of Whyalla in South Australia within the Whyal

2.2.2 Where is the primary jurisdiction of the proposed action? *

South Australia

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

The Proposed Action is planned across ten (10) land parcels, with one (1) leaseholder/landowner, Nonowie Energy Pty Ltd. The majority of the land tenure is Crown Land with Nonowie Energy Pty Ltd being the Crown Lessee however, one parcel is freehold.

The freehold parcel is the whole of the land comprised in Certificate of Title Volume 5431 Folio 483.

The Crown Land parcels are:

- The whole of the land comprised in Crown Lease Volume 6201 Folio 587 being sections 5, 6 and 7 hundred of Randell in the area named Middleback Range.
- The whole of the land comprised in Crown Lease Volume 6201 Folio 586 being sections 1 and 4 hundred of Randell in the area named Middleback Range.
- The whole of the land comprised in Crown Lease Volume 6201 Folio 584 being sections 10 and allotment 10 deposited plan 28411 hundred of Randell in the area named Middleback Range.
- The whole of the land comprised in Crown Lease Volume 6198 Folio 827 being sections 131, 133, 134, 135, 136, 137 and 138 hundred of Randell in the area named Middleback Range.
- The whole of the land comprised in Crown Lease Volume 6198 Folio 826 being sections 41 and 42 hundred of Randell in the area named Middleback Range.
- The whole of the land comprised in Crown Lease Volume 6198 Folio 825 being sections 30 and 31 hundred of Randell in the area named Middleback Range.
- The whole of the land comprised in Crown Lease Volume 6198 Folio 824 being sections 11 and 12 hundred of Randell in the area named Middleback Range.
- The whole of the land comprised in Crown Lease Volume 6198 Folio 823 being sections 6 and 7 hundred of Randell in the area named Middleback Range.

The whole of the land comprised in Crown Lease Volume 6201 Folio 585 being allotments 1 and 2 deposited plan 28423 hundred of Randell in the area named Middleback Range.

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area's environment.

The Proposed Action is located in Middleback Range on the Eyre Peninsula in South Australia. The Proposed Action is located approximately 10 km west of the township of Whyalla, and is wholly located within the Remote Areas Zone, on rural land currently used for sheep grazing.

The Interim Biogeographical Regionalisation of Australia (IBRA) identifies geographically distinct bioregions based on common climate, geology, landform, native vegetation, and species information. The bioregions are further refined into subregions and environmental associations. The Proposed Action is located in the Myall Plains subregion of the Gawler Bioregion (see **Att 2, Figure 1.4**).

The Gawler bioregion is characterised by semi-arid to arid, flat topped to broadly rounded hills of the Gawler Range Volcanics and Proterozoic sediments. It features low plateaux on sandstone and quartzite with an undulating surface of aeolian sand or gibbers and rocky quartzite hills with colluvial footslopes. Myall low open woodlands, open mallee scrub, bluebush/saltbush open chenopod shrublands and tall mulga shrublands on shallow loams characterise the bioregion.

The land has a rich history of agriculture and sheep and cattle grazing post-European settlement and is currently used for a combination of agricultural and pastoral activities, including relatively low intensity sheep grazing, across the different land parcels. Approximately 97% of the subregion is mapped as remnant native vegetation, of which 8% is formally conserved.

Twelve (12) Vegetation Associations have been surveyed across the Project Area. Low woodland and chenopod shrubland associations are widespread across the Project Area, while mallee and low shrublands are limited to small areas, often where isolated landscape features, such as granitic outcrops or drainage lines, occur.

Vegetation condition varies from poor to excellent across the Project Area, with poor condition vegetation observed at sites nearer to sheep grazing watering points. These areas likely have higher grazing pressure and the impact of grazing on vegetation is easily observed. Generally, though, grazing impact is indicative of light stocking regimes with vegetation condition improving with increased distance from existing waterpoints. Woodlands and shrublands in remote areas, particularly the western portion of the Project Area, are in excellent condition.

There are no permanent or larger named watercourses in the Project Area, however numerous minor ephemeral drainage lines flow in the west to east direction as elevation falls towards the coast. These steams flow only after heavy rainfall events and terminate within the Project Area, where artificial channels direct their flow into storage dams. The Spencer Gulf is located approximately 2km southeast of the Project Area, with the shoreline being characterised by mangrove forest and shallow, tidal sand and mud flats.

(See **Att 5, Figure 4**).

The Project Area is naturally bisected into a northern and southern area by the Lincoln Highway, which runs east-west through the Project Area. Other unsealed roads exist throughout the Project Area and are largely used by private landowners for access.

3.1.2 Describe any existing or proposed uses for the project area.

The Project Area is primarily used for sheep grazing and is within the Remote Areas Zone under the *Planning, Development and Infrastructure Act 2016*. The zoning or use of the land is not proposed to change due to the Proposed Action and it is expected that current land uses will coexist with the Proposed Action, consistent with other contemporary wind energy developments in Australia. Tilt Renewables maintains open discussions with the landholder regarding the preferred siting of infrastructure on their property and the existing agricultural land uses will continue alongside the Proposed Action during operations.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

No outstanding natural features are located within or proximal to the Proposed Action.

Two protected areas occur in the Project Area, totalling 511.7 ha in area. The two areas overlap, both located in the south-west of the Project Area adjacent to the Lincoln Highway. Information on the protected areas is below:

- Significant Environmental Benefit Offset (ID: 2008_2060).
- Heritage Agreement (ID: HA 1483).

No infrastructure or impact associated with the Proposed Action is proposed within these protected areas.

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

The topography of the Project Area is generally flat, with Salt Creek running along the western boundary and with three distinguishable terrain zones across the Project Area.

To the west, the ground elevations range from 100 to 170 m AHD, and in the central part, the terrain’s elevation varies between 50 to 90 m AHD. To the east, the ground elevations drop from 50 to 30 m AHD, then gradually declines to about 4 m AHD at the coastal plains near the Spencer Gulf. The highest ground slopes are in the western terrain zone, with the rest of the areas only containing slopes generally below 1%.

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

A Protected Matters Search Tool (PMST) Report was generated on 4 March 2025 with a 5km buffer applied to the Project Area, keeping with the requirements set out by the South Australian Native Vegetation Council for areas within the Eyre Peninsula Landscape Management Region where the NVC Bushland Assessment Methodology is relevant (noting that a narrow strip of approximately 1.6km on the western side of the Project Area falls within the South Australian Arid Lands Landscape Management Region, where the Rangeland Assessment Methodology is relevant). A copy of the PMST report is provided within the SIA (see **Att 2, Appendix A**).

There are multiple relevant ecological reports for the Proposed Action, attached and listed below:

- **Att 2**: SIA (with PMST report)
- **Att 3**: Ecological Impact Assessment
- **Att 4**: Flora and Fauna Assessment
- **Att 5**: Bird and Bat Utilisation Survey Summary Report.

The key flora and fauna findings relevant to this EPBC referral are contained within the SIA (**see Att 2**).

Flora

A total of 29 sites were surveyed by EBS Ecology (now and herein referred to as Umwelt) across the Project Area in accordance with the Bushland Assessment Method (BAM; NVC, 2020), with locations chosen based on differences in vegetation composition and condition. Additional targeted searches were undertaken for potential EPBC Act listed TECs.

No EPBC Act listed TEC were recorded or identified as likely or highly likely to occur in the Project Area. Following a field survey and key diagnostic characteristic assessment, the Subtropical and Temperate Coastal Saltmarsh (Vulnerable) TEC was considered unlikely to occur within the Project Area as the criteria for listing was not met.

No EPBC Act listed threatened flora species were identified as likely or highly likely to occur in the Project Area or identified in surveys undertaken to date. Further information on threatened flora species is provided in **Att 2, Section 3.5, Table 3.5** and **Att 3, Section 4.4, Table 4.1**.

Surveys identified one flora species as Vulnerable under the South Australian *National Parks and Wildlife Act* (NPW Act), but not listed under the EPBC Act, within the Project Area, being the *Santalum spicatum* (Sandalwood). Eighteen Sandalwood were recorded within the Project Area during surveys. The Proposed Action has been designed to minimise works in areas of known Sandalwood records and microsite infrastructure to avoid newly recorded Sandalwood. A 20m protection buffer will be maintained around Sandalwood trees in line with Umwelt's recommendation.

An additional two NPW Act listed species, which have not been recorded within the Project Area but which are likely or highly likely to occur, were assessed:

- Mallee Wattle (*Acacia montana*) (NPW Act: Rare)
- Lax Bluebush (*Maireana suaedifolia*) (NPW Act: Rare).

Fauna

Targeted and opportunistic fauna surveys were conducted for the Proposed Action between 2022 and 2024 and are ongoing. Additional survey effort focused on bird utilisation of the Project Area and targeted threatened species. The surveys identified terrestrial and migratory bird species as the primary class of fauna that could be impacted within the Project Area.

Umwelt established 30 bird survey sites within the Project Area and have been undertaking seasonal bird utilisation surveys since Spring 2022. Four seasonal bird utilisation surveys have been undertaken in the Project Area, two in Spring and two in Summer, consistent with the requirements for bird and bat monitoring as set out in the BBMP and as per EPBC Act survey guidelines for threatened bird species.

Two terrestrial bird species protected under the EPBC Act have been identified within the Project Area:

- Southern Whiteface (*Aphelocephala leucopsis leucopsis*) (EPBC Act: Vulnerable)
- Western Grasswren (*Amytornis textillis myall*) (EPBC Act: Vulnerable, NPW Act: Vulnerable).

As confirmed by DCCEEW in previous correspondence (see **Att 3, Section 3.1.3**), targeted seasonal surveys were only required for the Western Grasswren and migratory shorebirds, with spring the most suitable timing to detect the Western Grasswren. Both the Southern Whiteface and the Western Grasswren have been recorded regularly across majority of the Project Area in woodlands and shrublands. For further specific information on the occurrence of these species within the Project Area refer to **Att 5, Section 4.2.1 and Section 4.2.2**.

Coastline surveys were conducted during summer, as this is the ideal survey period for migratory shorebirds, which migrate to Australia to feed as their breeding grounds in the northern hemisphere are frozen over during winter. This is also consistent with *EPBC Act Policy Statement 3.21 Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species* (Department of the Environment and Energy, 2017) (**EPBC Act Policy Statement 3.21**) around survey timing and effort. The 4km shorebird survey area is representative of the Spencer Gulf, in that mangroves outline the fringe of the coastline on high tide and tidal mudflats are exposed at low tide. In line with EPBC Act Policy Statement 3.21, the shorebird survey area captured the entire length of coastline adjacent to the Project Area and included all habitat thought to be used by the same population of shorebirds.

For more detailed information on survey methodology and adequacy, refer to **Att 5, Section 3.1.6**.

Ten Migratory/Marine bird species protected under the EPBC Act have been identified during surveys in the shorebird survey area adjacent to the Project Area:

- Common Greenshank (*Tringa nebularia)* (EPBC Act: Endangered and Migratory)
- Sharp-tailed Sandpiper *(Calidris acuminata)* (EPBC Act: Vulnerable and Migratory)
- Great Egret *(Arbea alba modesta)* (EPBC Act: Marine)
- Red-necked Stint *(Calidris ruficollis)* (EPBC Act: Migratory and Marine)
- Red-capped Plover *(Charadrius ruficapillus)* (EPBC Act: Marine)
- Silver Gull *(Chroicocephalus novaehollandiae novahollandiae)* (EPBC Act: Marine)
- White-bellied Sea Eagle *(Haliaeetus leucogaster)* (EPBC Act: Marine, NPW Act: Endangered)
- Caspian Tern *(Hydroprogne caspia)* (EPBC Act: Migratory)
- Australian Pelican *(Pelecanus conspicillatus)* (EPBC Act: Marine)
- Crested Tern *(Thalasseus bergii cristatus)* (EPBC Act: Migratory and Marine).

Six additional EPBC listed species which have not been recorded during surveys but are considered a possible occurrence within the Project Area or as a fly-over species have been identified:

- Grey Falcon *(Falco hypoleucos)* (EPBC Act: Vulnerable, NPW Act: Rare) – possible occurrence within the Project Area
- Common Sandpiper (*Actitis hypoleucos*) (EPBC Act: Migratory, NPW Act: Rare) – possible fly-over species
- Black-tailed Godwit (*Limosa limosa*) (EPBC Act: Endangered, NPW Act: Rare) – possible fly-over species
- Australian Fairy Tern (*Sternula nereis nereis*) (EPBC Act: Vulnerable, NPW Act: Endangered) – possible fly-over species
- Fork-tailed Swift *(Apus pacificus)* (EPBC Act: Migratory/Marine) – possible fly-over species
- Eastern Osprey (*Pandion haliaetus cristatus)* (EPBC Act: Migratory, NPW Act: Endangered) – possible fly-over species.

No EPBC Act listed bat species were identified by database searches, as threatened bat species do not occur in the western part of South Australia. For completeness, bats were surveyed by recording calls of bats flying over the Project Area at night during three surveys using Anabat recorders. Echolocation

sonograms identified three common bat species within the Project Area. No bats listed as threatened under the EPBC Act or NPW Act were recorded in the Project Area during any of the surveys.

Fourteen species listed as threatened under the NPW Act have been recorded within or assessed as likely or highly likely to occur or fly-over the Project Area and/or shorebird survey area:

- Slender-billed Thornbill (*Acanthiza iredalei iredalei*) (NPW Act: Rare) – recorded in Project Area
- Australian Buzzard (*Ardeotis australis*) (NPW Act: Vulnerable) – highly likely to occur in Project Area
- Chestnut-backed Quailthrush (*Cinclosoma castanotum*) (NPW Act: Rare) – recorded in Project Area
- Banded Stilt (*Cladorhynchus leucocephalus*) (NPW Act: Vulnerable) – possible fly-over species
- White-winged Chough (*Corcorax melanorhamphos*) (NPW Act: Rare) – highly likely to occur in Project Area
- Peregrine Falcon (*Falco peregrinus macropus*) (NPW Act: Rare) – recorded in Project Area
- Sooty Oystercatcher (*Haematopus fuliginosus fuliginosus*) (NPW Act: Rare) – recorded in shorebird surveys and highly likely fly-over species
- Pied Oystercatcher (*Haematopus longirostris*) (NPW Act: Rare) – recorded in shorebird surveys and highly likely fly-over species
- White-bellied Sea Eagle (*Haliaeetus leucogaster*) (NPW Act: Endangered) – recorded in shorebird surveys and highly likely fly-over species
- Little Eagle (*Hieraaetus morphnoides*) (NPW Act: Vulnerable) – recorded in Project Area
- Shy Heathwren (*Hylacola cauta cauta*) (NPW Act: Rare) – recorded in Project Area
- Restless Flycatcher (*Myiagra inquieta*) (NPW Act: Rare) – highly likely to occur in adjacent shoreline
- Elegant Parrot (*Neophema elegans elegans*) (NPW Act: Rare) – highly likely to occur in adjacent shoreline
- Gilbert's Whistler (*Pachycephala inornata*) (NPW Act: Rare) – likely to occur in adjacent shoreline.

Two Wedge-tailed Eagle (*Auila audax)* nests were recorded within the Project Area during the Spring 2022 survey, with both nests found to be in good condition. The Proposed Action has been designed to avoid the recorded Wedge-tailed Eagle nests, establishing a 1km buffer in line with Umwelt's recommendation. No Peregrine Falcon (*Falco peregrinus),* Grey Falcon *(Falco hypoleucos)* or Eastern Osprey (*Pandion haliaetus cristatus)* nests were recorded within the Project Area.

Additional ecological matters identified by the desktop assessment and current surveys include weeds declared under the *Landscape South Australia Act 2016.*

Further information on the fauna values of the Project Area is provided in **Att 4, Section 5, 6 and 7; Att 5, Section 4 and 5; and Att 3, Sections 5, 6, 7 and 8.**

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

As previously identified, 12 Vegetation Associations have been mapped across the Project Area from flora surveys in accordance with the BAM. One was associated solely with the northern portion of the Project Area, five were associated solely with the southern portion, and the remaining six were present across the entire Project Area. *Maireana* spp. Shrublands, as well as *Acacia papyrocarpa* Woodlands, were the most dominant vegetation associations across the Project Area.

Under the NV Act and its guidelines, vegetation is considered native in South Australia if more than 5% of the composition is native. It does not need to be dominated by native vegetation. Therefore, vegetation of very low quality is often classed as native vegetation in South Australia. Vegetation condition across the Project Area ranged from poor to excellent, with poor condition vegetation observed at sites nearer to stock watering points. Woodlands and shrublands in remote areas, particularly the western Project Area, were in excellent condition.

The total proposed clearance associated with the Proposed Action amounts to 1,150.91 ha of native vegetation, including clearance of 11 vegetation associations.

Refer to **Att 2, Section 1.4, table 1.2** for a table of vegetation associations within the Project Area and their percentage of the total disturbance footprint. Refer to **Att 3, Section 8.1.1, Table 8.1** for an overview of their condition score and unit biodiversity score.

Three Declared Weeds under the LSA Act have been recorded within the Project Area. This reflects the current agricultural land use of the Project Area.

Existing access tracks and areas of prior disturbance have been incorporated into the design where possible (noting the designs and geometry requirements for the transportation of WTG components) to further minimise impacts to native vegetation. Areas of temporary vegetation clearance will be rehabilitated according to strategies detailed within a Construction Environmental Management Plan (CEMP) that will be prepared for the Proposed Action.

3.3 Heritage

3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

Independent Heritage Consultants (IHC) was engaged to undertake a desktop heritage assessment for the Proposed Action (IHC, 2022) which concluded that no known Aboriginal heritage sites or listed Commonwealth Heritage places are located within the Project Area.

3.3.2 Describe any Indigenous heritage values that apply to the project area.

The Proposed Action is located on lands traditionally claimed by the Barngarla People. The Project Area is within the Barngarla Native Title claim area (Tribunal file no. SCD2016/001; Federal Courts Number SAD6011/1998). The Federal Court has determined that Native Title does not exist in the Project Area.

As per the above, a desktop heritage assessment has been undertaken for the Project Area. A Taa Wika Register search was requested and confirmed that no known Aboriginal heritage sites or objects are located within the Project Area. Considering the Aboriginal heritage context of the area, the environmental landforms, and the level of previous development, IHC has assessed a low risk of works on the Project Area encountering unknown Aboriginal heritage sites/objects in previously developed areas and a high risk in previously undeveloped areas.

Although the Proposed Action is not on Native Title land, Tilt Renewables is working with BDAC to establish a Project Agreement for its implementation. As part of this agreement, BDAC will have the opportunity to survey the Project Area, either after the agreement is executed, or earlier if mutually agreed. The findings from any BDAC surveys will be documented in an Aboriginal Cultural Heritage Impact Assessment.

Although not mandated under the AHA, Tilt Renewables will look to implement the following options to further mitigate heritage risk for the Proposed Action in consultation with BDAC:

- Implementation of a site discovery procedure.
- Heritage site induction for construction workers.
- Archaeologist on call to identify potential discoveries.

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

The major watercourse in the Project Area's vicinity is Salt Creek. It drains through the Project Area's north-east corner then eventually into the Spencer Gulf. The catchment area of Salt Creek within the Project Area's north-east corner is approximately 1,414 km2.

Most of the Project Area is covered by local catchments that drain in an easterly direction into Salt Creek or Spencer Gulf. The Project Area's local catchment delineation and flow directions are as follows:

- The Project Area's north-western part drains north-east towards Salt Creek.
- The Project Area's central part drains south-east to Salt Creek or directly into Spencer Gulf.
- The Project Area's south-western corner drains westward away from the Project Area, towards the Gardiner Basin.
- In general, the Project Area's surface runoff would flow from the west towards the east.

A flood modelling assessment has been used to inform siting of relevant infrastructure, including WTG, BESS, substations and access tracks. Risks from potential flooding and stormwater inundation will continue to be addressed during the detailed design stage.

Once construction activities have been completed, all operational vehicles will be limited to undertaking maintenance activities from the defined access tracks. It is anticipated that these maintenance activities will not significantly increase the incidence of erosion and sediment transfer along existing drainage lines or ephemeral creeks.

The closest Ramsar wetland to the Proposed Action is the Banrock Station Wetland Complex located over 280 km south-east from the Project Area.

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	Yes	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The PMST report did not identify any World Heritage Places within the Project Area or buffer area. The nearest World Heritage Place is in the Willandra Lakes Region in NSW, located over 500km to the east from the Proposed Action. Due to the distance between the Proposed Action and the nearest World Heritage Place, the Proposed Action will not have a direct or indirect impact to World Heritage.

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The PMST report did not identify any National Heritage Places within the Project Area or buffer area. The nearest National Heritage Place to the Proposed Action is the Cuttlefish Coast Sanctuary Zone located approximately 25km east out of Port Bonython. Due to the distance between the Proposed Action and the nearest National Heritage Place, the Proposed Action will not have any direct or indirect impacts to National Heritage.

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The PMST report did not identify any Ramsar wetlands within the Project Area or buffer area. The nearest Ramsar wetland to the Proposed Action is the Banrock Station Wetland Complex located over 280km south-east from the Project Area. As a result of the distance between the Proposed Action and the Ramsar wetlands, the Proposed Action will not have a direct or indirect impact on Ramsar wetlands.

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

Direct impact	Indirect impact	Species	Common name
Yes	Yes	Amytornis textilis myall	Western Grasswren (Gawler Ranges)
Yes	Yes	Aphelocephala leucopsis	Southern Whiteface
Yes	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris canutus	Red Knot, Knot
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Caretta caretta	Loggerhead Turtle
No	No	Chelonia mydas	Green Turtle
No	No	Dermochelys coriacea	Leatherback Turtle, Leathery Turtle, Luth
No	No	Diomedea epomophora	Southern Royal Albatross
Yes	No	Falco hypoleucos	Grey Falcon
No	No	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
No	No	Grantiella picta	Painted Honeyeater
No	No	Leipoa ocellata	Malleefowl
No	No	Limosa lapponica baueri	Nunivak Bar-tailed Godwit, Western Alaskan Bar-tailed Godwit
No	No	Neophema chrysostoma	Blue-winged Parrot
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Pachyptila turtur subantarctica	Fairy Prion (southern)
No	No	Pedionomus torquatus	Plains-wanderer
No	No	Pterostylis xerophila	Desert Greenhood
No	No	Rostratula australis	Australian Painted Snipe

Direct impact	Indirect impact	Species	Common name
No	No	Sminthopsis psammophila	Sandhill Dunnart
No	No	Stagonopleura guttata	Diamond Firetail
Yes	No	Sternula nereis nereis	Australian Fairy Tern
No	No	Swainsona pyrophila	Yellow Swainson-pea
No	No	Thalassarche cauta	Shy Albatross
No	No	Thalassarche steadi	White-capped Albatross
No	No	Thinornis cucullatus cucullatus	Eastern Hooded Plover, Eastern Hooded Plover
Yes	Yes	Tringa nebularia	Common Greenshank, Greenshank

Ecological communities

Direct impact	Indirect impact	Ecological community
No	No	Subtropical and Temperate Coastal Saltmarsh

4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

Western Grasswren (Gawler Ranges) (*Amytornis textilis myall)* and Southern Whiteface (*Stagonopleura guttata)*

The primary risk to these species is associated with direct impacts in relation to the clearance of habitat during construction of the Proposed Action.

The Proposed Action will impact 0.77% of the Area of Occupancy (AOO) for the Western Grasswren (Gawler Ranges) and will trigger three significant impact assessment criteria.

Noting that the Southern Whiteface occurs across most of mainland Australia south of the tropics, a regional assessment of the species' Extent of Occurrence (EOO) and AOO has been undertaken. The AOO for the Southern Whiteface within the Gawler bioregion is 375,600ha across an EOO of 15,085,800ha and within the Myall Plains subregion of 80,400ha within an EOO of 453,400ha. Based on these figures, the clearance of 1,150.91ha of potentially suitable habitat within the Project Area represents approximately 0.01% across Australia as a whole, or 0.31% and 1.43% of the Gawler bioregion AOO and Myall Plains subregion AOO of the subspecies respectfully and will not trigger any significant impact assessment criteria.

Potential pathways for indirect impacts on Western Grasswren and Southern Whiteface include those listed below (noting that there is no literature specific to the Western Grasswren or Southern Whiteface that could be used to assess the likelihood of occurrence of these indirect impacts):

- Lighting – the Western Grasswren and Southern Whiteface are active during the day and lighting during construction and operation is not expected to impact daytime activity of the species. However, lighting used at night has the potential to impact the species' roosting behaviour.
- Changes to stormwater and/or surface water flows – construction of roads, hardstands and other infrastructure may permanently interrupt the natural surface water flows and create stormwater runoff. Changes in water flows and availability may adversely impact vegetation that forms Western Grasswren and Southern Whiteface habitat.
- Dust – dust created during construction activities may adversely impact vegetation that forms Western Grasswren and Southern Whiteface habitat.
- Noise – noise during construction could impact Western Grasswren's and Southern Whiteface by causing hearing damage. Continuous noise of sufficient intensity in the frequency region of bird hearing may also mask vocal signals. This could result in reduced breeding success, social interaction and impact to territorial distribution within the population. Noise of WTG during operation may also have this impact.
- Shadow flicker from WTG – the response of Western Grasswren's and Southern Whiteface to shadow flicker from WTG is unknown. However, it is possible that responses may include predator avoidance behaviours that would cause individuals to spend less time foraging and interacting. This may impact individual survival, breeding success and result in long-term decline.

A significant impact assessment was undertaken for the Western Grasswren and Southern Whiteface species using the EPBC Act significant impact guidelines 1.1 (DEWHA, 2013) (see **Att 2, Section 3.5, Table 3.5**).

Grey Falcon (*Falco hypoleucos*)

Although records for the Grey Falcon (*Falco hypoleucos*) (EPBC Act: Vulnerable, NPW Act: Rare) are scarce near the Proposed Action, potential habitat exists within the Project Area and thus has been considered a possible occurrence within the Project Area. The Proposed Action will not trigger any significant impact assessment criteria.

The total disturbance as a result of the Proposed Action is likely to represent a potential loss of general foraging habitat only (predominantly low shrublands and low woodlands), representing a very small fraction of total available habitat for this species across much of Australia. The clearance of 1,150.91ha of native

vegetation within the Disturbance Footprint represents a maximum 0.0004% of the species AOO and 0.00068% of the species EOO.

The Project Area is unlikely to support a specific important population of this species, with only a single recent record of the species (1998) occurring near the Proposed Action (approximately 9km west of the northwest corner of the Project Area), and the entire distribution of the species across much of arid-and semi-arid Australia considered a continuous population.

A significant impact assessment was undertaken for the Grey Falcon using the EPBC Act significant impact guidelines 1.1 (DEWHA, 2013) (see **Att 2, Section 3.5, Table 3.5**).

Threatened shorebirds

Four (4) additional threatened fauna species (all shorebirds) have either been recorded, are likely to occur, have suitable habitat nearby or may fly over the Project Area:

- Sharp-tailed Sandpiper (*Calidris acuminata)* (EPBC Act: Vulnerable and Migratory) – recorded in shorebird surveys and highly likely fly-over species.
- Common Greenshank (*Tringa nebularia)* (EPBC Act: Endangered and Migratory) – recorded in shorebird surveys and highly likely fly-over species.
- Black-tailed Godwit (*Limosa limosa)* (EPBC Act: Endangered and Migratory, NPW Act: Rare) – possible fly-over species.
- Australian Fairy Tern (*Sternula nereis nereis)* (EPBC Act: Vulnerable, NPW Act: Endangered) – possible fly-over species.

The Sharp-tailed Sandpiper and Common Greenshank were recorded during both shorebird surveys at the adjacent Cowleds Landing (approximately 2 km from the southeastern boundary of the Project Area). At the time of surveys, the species were either foraging, roosting or inactive. There is no suitable habitat within the Project Area, and both species are considered unlikely to occur within the Project Area directly. However, as these species were recorded along the shoreline adjacent to the Project Area (Cowleds Landing), both have been considered within the significant impact assessment as a possible fly-over species.

Potential direct impacts to the Sharp-tailed Sandpiper and Common Greenshank are limited to injury or mortality from collision with WTG. Flight height for these species within this environment has not been assessed to date, as both species were only detected foraging, roosting or inactive during surveys, also noting flight height data is often not available in published literature.

The Black-tailed Godwit and Australian Fairy Tern were not recorded within the Project Area, or in the adjacent shoreline (Cowleds Landing) during any ecological surveys over two years and are both considered unlikely to occur within the Project Area as no suitable habitat is located within the Project Area.

A significant impact assessment was undertaken for the Sharp-tailed Sandpiper, Common Greenshank, Black-tailed Godwit and Australian Fairy Tern species using the EPBC Act significant impact guidelines 1.1 (DEWHA, 2013) (see **Att 2, Section 3.5, Table 3.5**).

Threatened flora

One vegetation association identified on site (VA12; *Tecticornia disarticulate* Low Shrubland over *Atriplex vesicaria* and *Carpobrotus rossii)* was potentially associated with the Subtropical and Temperate Coastal Saltmarsh TEC identified in the PMST report, however, this vegetation association did not meet the key diagnostic criteria required for the TEC and was discounted from a significant impact assessment.

The two (2) identified flora species, Desert Greenhood (*Pterostylis xerophila)* and Yellow Swainson-pea (*Swainsona pyrophila),* are not considered likely to occur within the Project Area. Therefore, the Proposed Action is not expected to have any significant impact on these species.

No other threatened species or communities are likely to be directly or indirectly impacted by the Proposed Action as the Project Area has been adequately surveyed and no other threatened species or communities have been detected during ecological surveys.

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

Yes

4.1.4.5 Describe why you consider this to be a Significant Impact. *

Western Grasswren

Direct impacts from clearance of known or potential habitat (including foraging and nesting sites) and potential disturbance to the Western Grasswren during construction were considered to have a significant impact, as they triggered three of the nine significant impact criteria of the EPBC Act significant impact guidelines (refer to **Att 2, Section 3.5, Table 3.5**). The direct impacts include:

- Temporary and permanent clearance of approximately 1,092.16 ha of potentially suitable habitat.
- Potential long-term decrease in the size of groups within the Proposed action's Disturbance Footprint, calculated at 545 ha within/on the edge of the broader Whyalla Western Grasswren important population and equating to 0.77% of the total AOO for the species.
- Possible interruption to the breeding cycle during construction for a limited number (i.e. subset of the total population recorded within the Project Area) of Western Grasswren whose home range is within the Project Area.

Direct impacts on Western Grasswren from risk of injury or death from collision with turbine blades and indirect impacts from avoidance of the Proposed Action are unlikely to significantly impact this species. Bird strike or barotrauma for this species is considered highly unlikely due to the species' low flight height, with this being well below the rotor swept area of the WTG (minimum 40 m ground clearance) and recorded at a maximum of 1 m during surveys.

Direct impacts on Western Grasswren from fragmentation of an existing population is considered unlikely. Whilst the Proposed Action will result in the temporary and permanent clearance of habitat, the Disturbance Footprint will impact discrete, linear alignments and individual 'pads' principally associated with the wind farm access tracks and WTG hardstands. A substantial proportion of the Disturbance Footprint will be rehabilitated once construction is completed (e.g. construction tracks, temporary laydown areas, unground cabling, etc.). Once constructed, the species will still be able to move freely across the Project Area, as it is expected that the species will be able to traverse the narrow access tracks connecting the WTG within the Project Area and genetic flow will not be disrupted.

Whilst some Western Grasswren habitat will be impacted, due to the discrete, linear alignments principally associated with the wind farm access tracks and WTG hardstands, habitat critical to the survival of the species (i.e. breeding habitat) will be largely avoided. Existing access tracks will be used wherever possible, with new tracks micro-aligned to avoid critical habitat. Further, it is unlikely that impacts as a result of the Proposed Action will modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline.

Refer to **Att 2, Section 3.5, Table 3.5** for the full significant impact assessment for the Western Grasswren species.

Southern Whiteface

Direct impacts from clearance of known or potential habitat (including foraging and nesting sites) and potential disturbance to the Southern Whiteface during construction were considered unlikely to have a significant impact, with no significant impact criteria of the EPBC [SN3] Act significant impact guidelines triggered (refer to **Att 2, Section 3.5, Table 3.5**). The direct impacts include:

- Temporary and permanent clearance of approximately 1,150.91 ha of potentially suitable habitat, equating to 0.01% of the total [SN5] AOO for the species, 0.31% of the Gawler bioregion AOO and 1.43% of the Myall Plains subregion AOO.

An estimated potential impact of 1,150.91 ha of suitable habitat for this species will be disturbed as a result of the Proposed Action, however impact is divided across multiple vegetation associations and remnant native vegetation which is broadly suitable for the species extends across pastoral regions of the Eyre Peninsula. Direct impacts to the subspecies as a whole and at the regional and subregional level are considered negligible and not likely to lead to a long-term decrease in the size of an important population of

Southern Whiteface which occurs across much of Australia. Further, infrastructure such as access tracks are not likely to create a barrier that prevents the species' dispersal throughout the landscape and fragment populations.

Direct impacts on Southern Whiteface from risk of injury or death from collision with turbine blades and indirect impacts from avoidance of the Proposed Action are unlikely to significantly impact this species. Bird strike or barotrauma for this species due to rotor-sweep is considered highly unlikely due to the species' low flight height, with this being well below the rotor swept area of the WTG (minimum 40 m ground clearance) and recorded at a maximum of 2.5 m during surveys.

Refer to **Att 2, Section 3.5, Table 3.5** for the full significant impact assessment for the Southern Whiteface species.

Grey Falcon

Direct impacts from injury or mortality from collisions with WTG blades or the clearance of potential habitat for proposed infrastructure and roadway connectors creating a loss of potential general foraging habitat, and or temporary roosting habitat, is considered unlikely to have a significant impact, with no significant impact criteria of the EPBC Act significant impact guidelines triggered (refer to **Att 2, Section 3.5, Table 3.5**).

Potential direct impacts to the Grey Falcon from injury or mortality from collision with WTG is not considered to result in a significant impact. Flight height for these species within this environment has not been assessed to date, as the species has not been recorded in or near the Project Area during BBUS and thus no data has been captured, also noting flight height data is often not available in published literature.

Direct impacts from the clearance of potential habitat are also not considered to result in a significant impact. The clearance of 1,150.91ha of native vegetation within the Disturbance Footprint represents a maximum 0.0004% of the species AOO and 0.00068% of the species EOO. Of the total clearance, only 15.32ha includes large trees adjacent to watercourse areas, which may at best represent suitable roosting or nesting habitat for the species.

Refer to **Att 2, Section 3.5, Table 3.5** for the full significant impact assessment for the Grey Falcon species.

Threatened shorebirds

Given that coastal habitats (Cowleds Landing) are not impacted, it is considered unlikely that the Proposed Action would significantly impact the Sharp-tailed Sandpiper, Common Greenshank, Black-tailed Godwit or Australian Fairy Tern.

The Black-tailed Godwit and Australian Fairy Tern were not recorded within the Project Area, or in the adjacent shoreline (Cowleds Landing) during any ecological surveys over two years and are both considered unlikely to occur within the Project Area as no suitable habitat is located within the Project Area.

Potential impact risk primarily relates to injury or mortality from collision with WTG as a flyover species, noting that no suitable habitat for either species is located within the Project Area and the closest WTG to the shoreline (Cowleds Landing) is approximately 2 km to the north.

Flight height for each of these species within this environment has not been assessed to date (due to the species only being observed roosting or foraging during shorebird surveys). However, given coastal habitats are not impacted by the Proposed Action, it is unlikely the Proposed Action would lead to a long-term decrease in the size of a population, fragment an existing population or adversely impact habitat critical to the survival of the species.

Refer to **Att 2, Section 3.5, Table 3.5** for the full significant impact assessment for these species.

4.1.4.7 Do you think your proposed action is a controlled action? *

Yes

4.1.4.8 Please elaborate why you think your proposed action is a controlled action. *

Western Grasswren

The direct impact from the Proposed Action is likely to have a significant impact on the documented AOO of an important population of the species and is considered to be a controlled action for this MNES for the reasons outlined below:

- Approximately 1,092.16 ha of potentially suitable habitat, or 545 ha of potentially suitable habitat within the species' AOO, will be disturbed as a result of the Proposed Action, which equates to approximately 0.77%.
- The Proposed Action could possibly, due to the habitat disturbance, lead to a long-term decrease in the size of Western Grasswren groups living within the Disturbance Footprint calculated at 545 ha within/on the edge of the broader Whyalla population of the species, which is considered an important population.
- During construction it may be possible that the breeding cycle for a limited number of Western Grasswren whose home range is within the Project Area may be interrupted.

Southern Whiteface

The direct impact from the Proposed Action is not considered to have a significant impact on Southern Whiteface as a result of the potential to adversely affect documented habitat (DCCEEW, 2023) as critical to the survival of the species. Given the extensive distribution of the species across the Gawler bioregion and Myall Plains subregion and the small area of habitat removal compared to the total reported AOO and regional and subregional AOO, a significant impact is considered implausible. As such, the Proposed Action is not considered to be a controlled action for this MNES.

Grey Falcon

Direct and indirect impacts from the Proposed Action are unlikely to have a significant impact on the Grey Falcon, not triggering any of the significant impact criteria. As such, the Proposed Action is not considered to be a controlled action for this MNES.

Threatened shorebirds

Direct and indirect impacts from the Proposed Action are unlikely to have a significant impact on the Sharp-tailed Sandpiper, Common Greenshank, Black-tailed Godwit or Australian Fairy Tern, not triggering any of the significant impact criteria. As such, the Proposed Action is not considered to be a controlled action for these MNES.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

To minimise requirements for clearing native vegetation and threatened species habitat, the Proposed Action has been designed to ensure future infrastructure would be positioned within previously disturbed areas, wherever practicable. Key avoidance measures undertaken during the design stage included:

- Desktop and field surveys were conducted to identify key ecological constraints, feeding into the iterative design process to avoid and minimise interaction with important habitat as far as reasonably practicable.
- Micro-siting of infrastructure such as WTG and transmission line towers wherever practicable to avoid important habitat features and tree-lined watercourses.
- Construction of the Proposed Action to potentially occur in two stages (north of the Lincoln Highway and south of the Lincoln Highway), thereby minimising impacts to the breeding cycle of the species (as a whole).
- Rehabilitation of all temporary clearance areas.
- Use of transmission line construction techniques that avoid and minimise clearance of shrub layer vegetation, such as rolling transmission line stringing corridors and adjusting transmission tower heights to lift conductors above vegetation clearance distances.
- Access tracks were designed to align with existing tracks wherever practicable.
- Disturbance of areas of riparian vegetation and drainage lines have been avoided.
- Ongoing surveys and mapping activities to identify high-value areas of habitat for avoidance to inform further design amendments and application of the mitigation hierarchy.
- Development of an offset strategy according to DCCEEW guidelines to offset unavoidable residual impacts.

To reduce impacts to the identified MNES, the following avoidance and mitigation measures will be implemented during construction and operation of the Proposed Action:

- Conducting pre-construction clearance surveys.
- Development and enactment of a Bird and Bat Management Plan (including provisions for Western Grasswren and Southern Whiteface) that includes measures for managing known and unforeseen impacts during construction and operational phases of the Proposed Action.
- Development and implementation of clear protocols for management of waste during construction to avoid an increase in, or attraction of, feral pest animals to the Project Area.
- During construction, implement weed hygiene practices including vehicle checks and washdowns as required on vehicles or plant entering the construction site.
- During construction, undertake regular surveillance monitoring targeting Weeds of National Significance and Declared Weed species, with follow up controls as required for any identified weed outbreaks.
- During operations, implement weed surveillance and control programs targeting Weeds of National Significance and Declared Weed species (if weeds identified) on an annual basis.
- Maximise on-ground environmental offset (Significant Environmental Benefit) for native vegetation removal where opportunities are available.
- Progressive rehabilitation of all temporary construction areas.

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

In the event that DCCEEW determine the Proposed Action to be a controlled action, the Proponent will enquire if the action is able to be assessed by an accredited state process as a Native Vegetation Clearance Data Report for the Proposed Action will be submitted to the Native Vegetation Council after the EPBC Act referral is submitted.

An offset strategy will be prepared during the assessment of the clearance application, in consultation with the Native Vegetation Council, once the significant residual impacts have been determined regarding matters protected under the EPBC Act, Native Vegetation Act and NPW Act.

The Proponent will develop and implement an offset strategy once the type and extent of offsets are known for the Proposed Action.

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
Yes	No	Actitis hypoleucos	Common Sandpiper
Yes	No	Apus pacificus	Fork-tailed Swift
Yes	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris canutus	Red Knot, Knot
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Calidris melanotos	Pectoral Sandpiper
Yes	No	Calidris ruficollis	Red-necked Stint
No	No	Caretta caretta	Loggerhead Turtle
No	No	Charadrius veredus	Oriental Plover, Oriental Dotterel
No	No	Chelonia mydas	Green Turtle
No	No	Dermochelys coriacea	Leatherback Turtle, Leathery Turtle, Luth
No	No	Diomedea epomophora	Southern Royal Albatross
No	No	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
Yes	No	Hydroprogne caspia	Caspian Tern
No	No	Limosa lapponica	Bar-tailed Godwit
No	No	Limosa limosa	Black-tailed Godwit
No	No	Motacilla cinerea	Grey Wagtail
No	No	Motacilla flava	Yellow Wagtail
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Thalassarche cauta	Shy Albatross
No	No	Thalassarche steadi	White-capped Albatross
Yes	No	Tringa nebularia	Common Greenshank, Greenshank

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.5.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

Coastline surveys were conducted at either low or high tide to account for migratory shorebirds that may utilise the area in the direct vicinity of the Proposed Action (Cowleds Landing). Coastline surveys were only undertaken in summer during the two survey years, as this is the ideal survey period for migratory shorebirds which migrate to Australia to feed.

The area surveyed is a strip of coastline approximately 4 km in length, located to the southeast of the Project Area, as illustrated in **Att 5, Figure 6**. This strip of coastline was surveyed to assess if migratory shorebirds would utilise this area and as such could potentially be at risk of turbine strike.

Shorebird surveys identified five (5) species of birds listed as migratory under the EPBC Act that require wetland or aquatic habitats. These habitats do not occur in the Project Area; however, are located approximately 2km south of the Project Area in upper Spencer Gulf:

- Red-necked Stint (*Calidris ruficollis)* (EPBC Act: Migratory).
- Crested Tern (*Thalasseus bergii cristatus*) (EPBC Act: Migratory and Marine).
- Caspian Tern (*Hydroprogne caspia)* (EPBC Act: Migratory).
- Sharp-tailed Sandpiper (*Calidris acuminata*) (EPBC Act: Vulnerable and Migratory) – assessed in section 4.1.4.
- Common Greenshank (*Tringa nebularia*) (EPBC Act: Endangered and Migratory) – assessed in section 4.1.4.

Bird species listed as threatened (as well as migratory) in the EPBC Act have already been assessed in section 4.1.4 above. Non-MNES bird species otherwise protected by the EPBC Act (i.e. marine) have not been included for further assessment.

An additional three (3) EPBC Act listed migratory bird species were identified as likely or highly likely to occur within proximity of the Project Area (Cowleds Landing):

- Common Sandpiper (*Actitis hypoleucos*) (EPBC Act: Migratory, NPW Act: Rare).
- Fork-tailed Swift (*Apus pacificus)* (EPBC Act: Migratory, NPW Act: Rare).
- Eastern Osprey (*Pandion)* (EPBC Act: Migratory, NPW Act: Endangered).

During operation, direct impacts to migratory shorebirds may include risk of barotrauma, injury or mortality from collision with turbine blades. A significant impact assessment was undertaken for the above migratory shorebirds against the EPBC Act significant impact guidelines 1.1 (DEWHA, 2013) (refer to **Att 2, Section 3.5, Table 3.5**).

4.1.5.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

No

4.1.5.6 Describe why you do not consider this to be a Significant Impact. *

Red-necked Stint (*Calidris ruficollis*), Crested Tern (*Thalasseus bergii cristatus*) and Caspian Tern (*Hydroprogne caspia*)

The potential for direct impacts from risk of injury or death from collision with WTG to the Red-necked Stint, Crested Tern and Caspian Tern were not at variance with any of the three significant impact criteria of the EPBC Act significant impact guidelines 1.1 (DEWHA, 2013), as such the possible impacts are not considered to be significant to any of these MNES.

Potential impact risk primarily relates to injury or mortality from collision with WTG as a flyover species, noting that no suitable habitat for these species is located within the Project Area and the closest WTG to the shoreline (Cowleds Landing) is approximately 2 km to the north. Flight height for these species within this environment has not been assessed to date (due to the species only being observed foraging or inactive during shorebird surveys).

The Proposed Action is not located in an area where an ecologically significant proportion of a population exists. The Spencer Gulf is considered to be one of the sites of international importance based on maximum or average counts for these species, however, there are no nationally or internationally important sites for these species known within the Project Area. The closest listed sites according to the National Directory of Important Migratory Shorebird Habitat (Weller et al., 2020) include the Whyalla Effluent Ponds approximately 8km east of the Project Area and the BHP Saltfields (Whyalla Salt Evaporation Ponds) approximately 14km east of the Project Area (see **Att 2, Figure 1.2**).

Whilst it is acknowledged that there is a small risk that some individuals may interact with the WTG, it is considered unlikely that the Proposed Action would seriously disrupt the lifecycle (breeding, feeding, migration and resting behaviour) of a documented important population of the species, also noting that coastal, wetted or ephemeral habitats will not be impacted by the Proposed Action.

Common Sandpiper (*Actitis hypoleucos)*, Fork-tailed Swift (*Apus* pacificus) and Eastern Osprey (*Pandion*)

The potential for direct impacts from risk of injury or death from collision with WTG to the Common Sandpiper, Fork-tailed Swift and Eastern Osprey were not at variance with any of the three significant impact criteria of the EPBC Act significant impact guidelines 1.1 (DEWHA, 2013), as such the possible impacts are not considered to be significant to any of these MNES.

No suitable habitat is located within the Project Area, except for limited areas associated with pastoral dams. It is noted that none of these species were recorded within the Project Area nor during surveys at the adjacent Cowleds Landing coastline, nor were any nationally or internationally important sites for these species recorded within the Project Area. The Proposed Action is not located within an area where an ecologically significant proportion of these migratory species exist.

As above, whilst it is acknowledged that there is a small risk that some individuals may interact with the WTG, it is considered unlikely that the Proposed Action would seriously disrupt the lifecycle (breeding, feeding, migration and resting behaviour) of a documented important population of the species, also noting that coastal, wetted or ephemeral habitats will not be impacted by the Proposed Action. The Fork-tailed Swift is exclusively aerial, with known flight heights between ground level to at least 300m above ground, meaning there is a small but material risk that an occasional individual of this species may interact with the WTG.

4.1.5.7 Do you think your proposed action is a controlled action? *

No

4.1.5.9 Please elaborate why you do not think your proposed action is a controlled action. *

As the Proposed Action is not considered to comprise important habitat for the Red-necked Stint, Crested Tern, Caspian Tern, Common Sandpiper, Fork-tailed Swift and Eastern Osprey, significant impacts to these species are not expected. The potential for direct impacts from risk of injury or death from collision with the turbine blades were not considered to present a significant impact to these species, and as such the Proposed Action should not be considered a controlled action for this MNES.

4.1.5.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

Desktop and field surveys were undertaken to identify key ecological constraints, feeding into an iterative design process. The iterative design process aimed to avoid interaction with appropriate habitat so far as reasonably practicable. This included implementing a protection buffer around threatened and migratory habitat near the Proposed Action (southeastern corner near Cowleds Landing) to minimise and mitigate bird strike risk.

Additional shorebird surveys will be undertaken to continue data collection on potential species that utilise the adjacent coastline, for either foraging or roosting purposes. From the additional surveys, the data will be utilised to further determine the level of importance of the adjacent surveyed coastline habitat and observed populations according to the Industry Guidelines (DOEE 2017).

Tilt Renewables will develop and enact a Bird and Bat Management Plan (including provisions for migratory shorebirds) for the Proposed Action, that includes measures for managing known and unforeseen impacts during construction and operation.

4.1.5.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

In the event that DCCEEW determine the Proposed Action to be a controlled action for migratory shorebirds, an offset strategy will be prepared (including offset requirements for migratory shorebirds) once the significant residual impacts have been determined regarding matters protected under the EPBC Act, Native Vegetation Act and NPW Act.

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is not a nuclear action.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The PMST report did not identify any Commonwealth Marine Areas within the Proposed Action or land surrounding the Proposed Action. The nearest Commonwealth Marine Area to the Proposed Action is the Western Eyre Marine Park, located over 300km to the south of the Proposed Action, off the coast of Port Lincoln. The Proposed Action does not interact with the marine environment in any way and there is not considered to be potential for impacts to this MNES.

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is located in South Australia and is not proximate to the Great Barrier Reef.

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action does not involve coal seam gas and it is not a large coal mining development.

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The PMST Report did not identify any Commonwealth Lands within or proximal to the Proposed Action. As a result, it is considered there will be no potential impact to this matter.

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action does not impact a Commonwealth Heritage Place Overseas; therefore, this matter is not impacted.

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

No

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

- Threatened Species and Ecological Communities (S18)

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

No

4.3.8 Describe why alternatives for your proposed action were not possible. *

The Proposed Action is an energy generation project of renewable energy. The alternative would be generating from more conventional fuel such as from fossil fuels. Such an alternative to the Proposed Action is much less favourable, due to the harmful emissions resulting from fossil fuel electricity generation, compared to the low residual environmental impact from this Proposed Action once operational.

When searching for potential wind farm sites, a number of selection criteria are applied in order to determine site suitability. They include environmental, social, technical and operational criteria, such as good wind resource, proximity to a feasible electricity connection point, separation from places of residence, land availability, and low ecological and heritage values. The Project Area was targeted due to its ability to meet all the above-mentioned required criteria, ahead of other possible locations in the wider region.

The WTG layout and the Indicative Disturbance Footprint have been designed to best make use of the quality wind resource of the Project Area, while taking into account the environmental constraints as described in the referral. To minimise requirements for clearing native vegetation, the Proposed Action has been designed to ensure future infrastructure would be positioned within previously disturbed areas wherever practicable and further detailed design will seek to minimise impacts to areas of higher quality habitat features.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 1_Project Layout Map.pdf Project Layout Map	07/04/2025	No	High
#2.	Document	Att 2_Significant Impact Assessment.pdf Significant impact assessment undertaken to assess the significance of residual impacts of the Proposed Action on Matters of National Environmental Significance (MNES) under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act).	03/04/2025	No	High
#3.	Document	Att 3_Ecological Impact Assessment.pdf Ecological Impact Assessment to assess impacts of the Proposed Action and provide recommendations for mitigation.	03/04/2025	No	High
#4.	Document	Att 4_Flora and Fauna Assessment.pdf Flora and Fauna Assessment capturing results of vegetation field survey and initial investigation of species relevant to the Proposed Action.	25/09/2023	No	High
#5.	Document	Att 5_Bird and Bat Utilisation Summary.pdf Bird and Bat Utilisation Survey Summary Report, collating all data from utilisation and targeted surveys undertaken to date.	03/04/2025	No	High

1.2.5 Information about the staged development

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 6_Related Action Map.pdf Map geographically showing the Proposed Action and Related Action.	23/03/2025	No	High
#2.	Link	EPBC Act Policy Statement - Staged Developments - Split referrals: Section 74A of the EPBC Act https://www.dcceew.gov.au/sites/default/files/do..			High

1.2.6 Commonwealth or state legislation, planning frameworks or policy documents that are relevant to the proposed action

Type	Name	Date	Sensitivity	Confidence
#1.	Link	EPBC Act Policy Statement 2.3: Wind farm industry https://www.dcceew.gov.au/environment/epbc/publi..		High
#2.	Link	EPBC Act Policy Statement 3.21 - Industry guidelines for avoiding, assessing and mitigating impacts https://www.dcceew.gov.au/environment/epbc/publi..		High
#3.	Link	Significant Impact Guidelines 1.1 - Matters of National Environmental Significance https://www.dcceew.gov.au/environment/epbc/publi..		High
#4.	Link	Survey guidelines for Australias threatened bats https://www.dcceew.gov.au/environment/epbc/publi..		High
#5.	Link	Survey guidelines for Australias threatened birds https://www.dcceew.gov.au/environment/epbc/publi..		High

1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Nonowie Wind Farm - Tilt Renewables https://tiltrenewables.com/portfolio/nonowie-win..			High
#2.	Link	Who has a RAP? Tilt Renewables https://recaus.my.salesforce.com/sfc/p/#5g000003..			High

1.3.2.16 (Person proposing to take the action) Nature of the trust arrangement in relation to the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 7_Development Hold Trust Deed (CONFIDENTIAL).pdf	04/10/2022	Yes	

1.3.2.17 (Person proposing to take the action) Proposer's history of responsible environmental management

	Type	Name	Date	Sensitivity	Confidence

#1.	Document	Att 8_Environmental Policy_Nov 2023.pdf Tilt Renewables Environmental Policy	31/10/2023	No	High
#2.	Document	Att 9_Sustainability Policy_Nov 2023.pdf Tilt Renewables Sustainability Policy	31/10/2023	No	High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Clearing Native Vegetation - Bushland Assessment Method https://www.environment.sa.gov.au/topics/native-..			High

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN	52637320597
Organisation name	TILT RENEWABLES DEVCO PTY LTD
Organisation address	3000 VIC
Representative's name	Sia Niakolas
Representative's job title	Environment and Development Planner
Phone	0460325196
Email	sia.niakolas@tiltrenewables.com
Address	Level 24, 600 Bourke Street, Melbourne, Victoria, Australia

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ By checking this box, I, **Sia Niakolas of TILT RENEWABLES DEVCO PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	52637320597
Organisation name	TILT RENEWABLES DEVCO PTY LTD
Organisation address	3000 VIC
Representative's name	James Beckett

Representative's job title	Manager, Environment and Planning
Phone	0419631905
Email	james.beckett@tiltrenewables.com
Address	Level 24, 600 Bourke Street, Melbourne, Victoria, Australia

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ I, **James Beckett of TILT RENEWABLES DEVCO PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

✔ Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ I, **James Beckett of TILT RENEWABLES DEVCO PTY LTD**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

☐ I would like to receive notifications and track the referral progress through the EPBC portal. *