Yathroo Wind Farm

Application Number: **03247** Commencement Date: **02/12/2025** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Yathroo 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 *

01/10/2026

1.1.4 Estimated end date *

01/10/2056

1.2 Proposed Action details

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

Neoen Australia Pty Ltd (Neoen) (the Proponent) is seeking to develop, construct and operate the Yathroo Wind Farm (the Project) approximately 5 km south of the town of Dandaragan, 6.3 km north of Regans Ford, and 120 km north of Perth, Western Australia. The Project will involve the construction of up to 65 wind turbines, a battery energy storage system (BESS), and associated infrastructure, and will be developed across freehold properties and road reserves, covering an area of 15,618 hectares (ha) referred to as the Project Area (see Att1-Pt1-MNES Report_Body, Figure 1.1, p3).

The Project location was selected for development because it had strong wind resource, compatible land use with minimal clearing required, has existing road network access and existing high voltage transmission line located at the southwestern and western boundary of the Project Area, has a low population density with minimal amenity impacts and favourable construction conditions.
The Project will be compatible with existing cropping and grazing land uses, offering a diverse and consistent form of revenue to landholders. The Project will assist in the clean energy transition and decarbonization of energy networks in Western Australia which have been identified as a key goal for the Western Australian Government.

The wind turbines will have a horizontal axis and a rotor consisting of three blades with a maximum blade length of up to 91 metres (m) and a maximum hub height of up to 170 m. The selected blade and hub height will be configured so that the total tip height of each wind turbine does not exceed 261 m.

The Project will include the following key infrastructure elements:

- turbines
- turbine foundations
- hardstands
- electrical connections, substations, terminal and grid connection
- underground cabling
- Battery Energy Storage System (BESS)
- operational and maintenance facility
- construction compound, concrete batching plants and laydown areas
- borrow pits/quarries
- permanent meteorological masts
- communication towers
- external site access
- internal access roads
- firewater tanks
- utilities.

Project infrastructure will be located within a 3,443 ha Development Corridor (see Att1-Pt1-MNES Report Body, Figure 1.2, p7) within the Project Area, which has been defined by applying suitable buffers around the proposed infrastructure. This strategy allows for micro-siting and optimisation of the final infrastructure layout, following a detailed engineering design process.

The following Project construction activities are expected to occur and have the potential to impact on the environment:

- Site establishment (temporary site facilities, lay down areas, equipment and materials).
- Road improvement works.
- Earthworks for access roads and wind turbine hardstands.
- Excavation for the foundations.
- Construction of wind turbine foundations (bolt cage, reinforcement and concrete).
- Construction of BESS, substation and ancillary infrastructure.
- Installation of electrical and communications cabling and equipment (including overhead feeders from cable marshalling points to the substation).

- Installation of wind turbine transformers, in parallel with electrical reticulation works.
- Installation of towers for the wind turbines, and delivery of the wind turbine components to the Project site.
- Erection of wind turbines, using high-level mobile cranes.
- Installation of overhead powerline and associated towers/poles.
- Commissioning of wind turbines, followed by reliability testing.

To ensure the potential impacts associated with the above construction activities are sufficiently assessed, all technical assessments have been based on a 'worst case' Indicative Project Footprint of 729.1 ha. This Indicative Project Footprint has been primarily confined to previously cleared land, however will result in the clearing of up to 10.28 ha of remnant native vegetation, 5.45 ha of isolated remnant trees in cleared agricultural land and 7.33 ha of planted vegetation (native and non-native). The Project layout is depicted in Att1-Pt1-MNES Report_Body (Figure 2.1, p11).

The Project will connect into an existing Western Power transmission line in the south-west and west of the Project Site that provides suitable network access with sufficient capacity to accommodate the Project. The required capacity will be provided by Western Power's Clean Energy Link North, a major transmission upgrade project designed to support the integration and transfer of renewable energy from the northern parts of the network. The Clean Energy Link North project is scheduled for completion in 2027.

The Project construction period is estimated at approximately 33 to 36 months. The workforce is expected to fluctuate in size throughout this period, with an estimated peak construction workforce of up to 450 personnel. It is expected that some of the workforce will commute from the wider local areas such as Moora, Dandaragan and Cataby. Neoen is working with the Shire of Dandaragan on the accommodation options including temporary and permanent accommodation. The Project is not expected to construct permanent or temporary accommodation within the Project Area.
During operations, both on-site and off-site personnel will manage the Project. It is expected that the Project will generate approximately 15 permanent, full-time jobs through its 30-year operational life.

Towards the end of its operational life, Neoen may choose to undergo decommissioning and rehabilitation of the land in accordance with a decommissioning management plan and relevant approval conditions. It is possible that Neoen may choose to instead re-power the Project by installing new equipment, but this would be subject to future planning and environmental approvals, land agreements and commercial outcomes.

The referral form should be read in conjunction with the attached supporting documents/spatial information:

Attachment 1: Yathroo Wind Farm – Assessment of Impacts to Matters of National Environmental Significance

- Att1-Pt1-MNES Report_Body
- Att1-Pt2-MNES Report_Appendix A Detailed and Targeted Flora and Vegetation Assessment
- Att1-Pt3-MNES Report_Appendix A Detailed and Targeted Flora and Vegetation Assessment
- Att1-Pt4-MNES Report_Appendix A Detailed and Targeted Flora and Vegetation Assessment
- Att1-Pt5-MNES Report_Appendix A Detailed and Targeted Flora and Vegetation Assessment
- Att1-Pt6-MNES Report_Appendix B Basic and Targeted Fauna Assessment
- Att1-Pt7-MNES Report_Appendix C Targeted Fauna Habitat Assessment
- Att1-Pt8-MNES Report_Appendix D Preliminary Bird and Bat Adaptive Management Plan
- Att1-Pt9-MNES Report_Appendix E Protected Matter Search Tool Results
- Att1-Pt10-MNES Report_Appendix F Likelihood of Occurrence Assessment
- Att1-Pt11-MNES Report_Appendix G Preliminary Construction Environmental Management Plan
- Att1-Pt12-MNES Report_Appendix H Bird and Bat Utilisation Summary Report
- Att1-Pt13-MNES Report_Appendix I Significant Impact Assessments

Attachment 2: Neoen Health, Safety and Environmental Policy

- Att2- Neoen HSE Policy

Attachment 3: Neoen Sustainability Framework

- Att3-Neoen Sustainability Framework

Attachment 4: Lot and Plans within Project Area

- Att4-Lots and Plans in Project Area.

Attachment 5: Heritage Due Diligence Assessment

- Att5-Heritage Due Diligence Assessment

Attachment 6: Yathroo Community Engagement Plan

- Att6-Yathroo Community Engagement Plan

Attachment 7: Yued Heritage Protection Agreement

- Att7-Pt1-Yued Heritage Protect Agreement
- Att7-Pt2-Yued Heritage Protect Agreement

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

No

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

Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) is administered by the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW). Under the EPBC Act, if the Minister for the Environment determines that an action is a "controlled action" which would have or is likely to have a significant impact on Matters of National Environmental Significance (MNES) or Commonwealth land, then the action may not be undertaken without prior approval from the Minister.

Significant Impact Guidelines 1.1 – Matters of National Environmental Significance

The MNES Guidelines provide overarching guidance on determining whether an action is likely to have a significant impact on a matter protected under the EPBC Act.

The significance of the proposed action on MNES can be determined through self-assessment. The significant impact criteria set out in the guideline for each MNES are to assist in determining whether the impacts of the proposed action on any MNES are likely to be significant.

If after undertaking a self-assessment it is concluded that the action is likely to have a significant impact on any MNES, or if unsure, the action should be referred to the Minster. If the Minister decides that the action is likely to have a significant impact, then the action will be determined as a controlled action requiring approval under the EPBC Act.

Referral Guidelines for 3 WA Threatened Black Cockatoo Species

The Guidelines for 3 WA Threatened Black Cockatoo Species adheres to the EPBC Act and is regulated by DCCEEW. The referral guidelines provide guidance to proponents on the need to refer an action that has the potential to affect any of the three species:

- Carnaby's Cockatoo (*Zanda latirostris*)
- Baudin's Cockatoo (*Zanda baudinii*)
- Forest Red-tailed Black-cockatoo (*Calyptorhynchus banksii naso*)

This document distinguishes what actions are deemed likely (or unlikely) to require a referral to the Minister based on whether the action will have a significant impact on the species. Information on habitat quality, survey expectations, mitigation standards, as well as the aspects needing to be considered to determine whether referral is necessary, are also detailed in this document.

EPBC Act Policy Statement 3.21: Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species. Commonwealth of Australia.

Provides guidance to proponents on when an action that may affect listed migratory shorebird species requires referral to the Minister. These guidelines apply to all migratory shorebirds listed as MNES under the Act, including those protected under international agreements such as JAMBA, CAMBA, ROKAMBA, and the Bonn Convention.
The guidelines outline the criteria for identifying important habitat for migratory shorebirds. Habitat is considered nationally important if it regularly supports:

- 0.1% of the East Asian-Australasian Flyway population, or
- >2,000 migratory shorebirds, or
- >15 migratory shorebird species.

EPBC Act Biodiversity Offsets Policy

The EPBC Act Environmental Offsets Policy (EPBC Offset Policy) outlines the approach for the use of environmental offsets under the EPBC Act.

Weeds of National Significance

Under the Australian Weeds Strategy 2017 – 2027 32 introduced plants are identified as Weeds of National Significance. This list of species was developed with reference to several key criteria: invasive tendencies, impacts, potential for spread, and socioeconomic and environmental values.

State Legislation (WA)

Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (WA) (BC Act) seeks to 'conserve and protect biodiversity and biodiversity components in the State' and 'to promote the ecologically sustainable use of biodiversity components in the State'.

It not only provides for the formal listing of native flora, fauna, and ecological communities that are under threat and in need of protection but also regulates the taking, disturbing, supplying, possessing, processing, dealing, importing, and exporting of all native flora and fauna.

Activities that involve the taking, disturbing, supplying, possessing, dealing, importing, or exporting of any native flora and fauna will require an appropriate licence issued by DBCA under the BC Act.

Environmental Protection Act 1986

The *Environmental Protection Act 1986* (WA) (EP Act) provides the legal framework to prevent, control and abate pollution and environmental harm in WA, as well as the legal basis to conserve, preserve, protect, enhance, and manage the environment.

The Environmental Protection Authority (EPA), undertakes environmental impact assessments, develops environmental protection policy, prepares guidelines for managing environmental impacts, and provides strategic advice to the Minister for Environment.

Part IV of the EP Act requires projects that are likely to have a significant effect on the environment to be referred to the EPA to decide if an environmental impact assessment is required.

Part V of the EP Act regulates emissions and discharges to the environment through a works approval and licensing process and regulates the clearing of native vegetation through clearing permit applications. The Department of Water and Environmental Regulation (DWER) is responsible for administering Part V of the EP Act. Applications to clear native vegetation are assessed and decided in accordance with the EP Act, in particular the Clearing Principles (under Schedule 5 of the EP Act).

The Project is being referred to the EPA under Part IV of the EP Act to determine whether formal assessment is required. Should the project not require formal assessment under Part IV, a native vegetation clearing permit will be applied for under Part V of the EP Act.

Environmental Offset Policy (2011) and Guidelines (2014)

The 2011 Environmental Offset Policy and 2014 Guidelines provides the overarching framework for offset design, quantification, and implementation in Western Australia. Offsets are required to address residual significant impacts to protected State matters and may be implemented under the BC Act, or Part IV or V of the EP Act. Depending on the legislation under which the offsets are implemented, the regulating agency may be the EPA, DWER or the Department of Biodiversity, Conservation and Attractions (DBCA). It is expected that offsets will be required to be implemented under the EP Act.

Planning and Development Act 2005

The *WA Planning and Development Act 2005* (PD Act) is the primary legislation under which development in WA is regulated. Under this Act, any development requires approval unless a range of exemptions apply. Decision makers for development applications under the PD Act are required to consider a range of factors,

including potential environmental impacts. Specifically, decision makers under the PD Act need to consider relevant planning policies and guidelines which include:

- WAPC Position Statement for Renewable Energy Projects
- State Planning Policy 2
- State Planning Policy 2
- Guidance Statement 33

The Project was granted approval under the Planning and Development Act 2005 on 23 October 2025 with one of the conditions being the development and implementation of a Bird and Bat Adaptive Management Plan, to the satisfaction of the Shire of Dandaragan in consultation with the Department of Biodiversity, Conservation and Attractions.

Biosecurity and Agriculture Management Act 2007
The *Biosecurity and Agriculture Management Act 2007* (WA) (BAM Act) provides the legal framework to:

- Address invasive, weeds and diseases
- Ensure agricultural and veterinary chemicals are used safely
- Establish standards for safe and quality agricultural products
- Raise funds for biosecurity-related purposes

The BAM Act also supports biosecurity activities to detect, contain, manage or eradicate prohibited organisms/declared pests that enter the state.

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. *

A Community and Stakeholder Engagement Plan (CSEP) has been developed for the Project and is aligned with Neoen's stakeholder engagement framework and further informed by best-practice stakeholder engagement approaches. The stakeholder and community engagement for the Project has been led by Neoen with support from community engagement specialists. Neoen considers it important that trusting relationships are developed between the people on the ground who know the project the best, and the stakeholders that are part of and connected to their region and local community and want to ensure stakeholder concerns and priorities are considered in the design and implementation of the Project. Due to the rural nature of the community, the overall approach to consultation for the Project has and will continue to be open, relaxed, flexible and responsive.

Through implementation of the CSEP the following stakeholder groups have been engaged:

- Traditional Owner groups
- Nearby landowners
- Local community members from the Shire of Dandaragan
- Community organisations and service providers
- Special interest community groups
- Relevant local, State and Federal government agencies

Traditional Owners Consultation

Consultation has been undertaken with the relevant Traditional Owner groups (Yued Aboriginal Corporation (YAC) and the Local Elders and Yued Community Members) through meetings and written communication. A desktop Aboriginal and historical heritage due diligence assessment of the Project Area has been completed. An initial archaeological and ethnographic heritage survey was undertaken with the relevant Traditional Owner group of proposed disturbance areas in zones with a high potential of encountering Aboriginal Cultural Heritage material. The YAC and Neoen executed the Yued Heritage Protection Agreement (YHPA) on the 28th of May 2025 (see Att7-Pt1-YHPA and Att7-Pt2-YHPA). Neoen is abiding by the YHPA process.

Consultation with the relevant Traditional Owner groups will be ongoing throughout the Project.
Neoen commenced engagement with surrounding landholders in Q4 2023 and with broader stakeholder and community engagement commencing in Q1 2024.

Surrounding Landholders and Broader Community Consultation

Neoen hosted three Community Information Sessions on the 12th and 13th of March 2025. The initial session, held on 12th March at the Moora Recreation Centre, was dedicated to members of the Yued Aboriginal Community and was attended by five individuals.

On 13th March 2025, two further Community Information Sessions took place. During and after the event, the community was invited to provide comments and feedback on the Project via the Project's Simply Stakeholder survey feedback form, as also shared on the website.

Following the community information sessions, all close neighbors were engaged who could not attend via in person, phone and email to provide community day material. Further, for the wider community day a newspaper article with project details was published in the Redgum Reports on 10 April 2025.

- Surrounding landowners
- Local Community
- Service groups, business and service Providers.

The Yathroo Wind Farm Project website was set up at www.yathroowindfarm.com.au during the early stages of development to provide clear and accessible information about the project to the community. The Project website will be regularly updated with Project updates throughout the full lifecycle of the Project. A Project email and 1800 number have been established and are available via the website.

Through implementation of the above community engagement mechanisms, the following key concerns and benefits were identified.

Key Concerns:
• Incoming construction workforce causing strain on short-term accommodation and the housing market
• Discussions on how community benefit funds are to be allocated prior to construction.
• Visual amenity concerns related to Project infrastructure

Key Benefits:
Opportunity for legacy accommodation benefits
Procurement opportunities for local businesses and service providers
Opportunities for employment, training, and upskilling of local people
Economic benefits due to incoming construction workforce using local businesses
Increased diversification of the local economy and industry

The Project has already commenced implementation of social impact management measures to address the social impacts of the Project, including the development of a Community Benefit Sharing program. A number of Community Benefit Sharing initiatives were presented by Neoen during community information sessions, with the community asked to provide ideas for funding in the following areas:

- Sporting & Recreation
- Arts, Culture & Events
- Energy Efficiency & Environment
- Health & Wellbeing
- Education & Training
- Disaster Relief & Emergency Services
- Tourism

Larger project funding will be available and ongoing discussion to decide on how localised funding will be administered.

The Project will also deliver a neighbour benefit scheme, going ‘above and beyond’ the state government’s planning requirements for large-scale renewable energy project in WA. This will include benefit for impact from project transmission lines which was direct feedback from the community.

Agency Consultation

Consultation has been carried out by the Proponent with the following approval agencies:

- Department of Climate Change, Energy, the Environment and Water (DCCEEW)
- Department of Water and Environmental Regulation (DWER) (WA)
- Shire of Dandaragan

Other agencies consulted:

- Department of Planning, Lands and Heritage (DPLH) (WA)
- Department of Biodiversity, Conservation and Attraction (DBCA) (WA)
- Airservices Australia
- BOM
- Geoscience Australia
- CASA
- Main Roads WA (MRWA)
- Western Power (WP) (WA)
- AMC Australian Marine Complex Western Australia
- Local Bushfire Control (WA)
- Energy Policy WA and Powering WA

- Ports Authority
- Water Corporation
- Shire of Dandaragan

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.

Personal information may be disclosed to other Australian government agencies, persons or organisations where necessary for the above purposes, provided the disclosure is consistent with relevant laws, in particular the Privacy Act 1988 (Privacy Act). Your personal information will be used and stored in accordance with the Australian Privacy Principles.

See our Privacy Policy to learn more about accessing or correcting personal information or making a complaint.

Alternatively, email us at privacy@dcceew.gov.au.

☑ **Confirm that you have read and understand this Privacy Notice ***

1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN	57160905706
Organisation name	NEOEN AUSTRALIA PTY. LTD.
Organisation address	2000 NSW

Referring party details

Name	Arkar Arkar
Job title	State Leader WA
Phone	0416987586
Email	arkar@neoen.com
Address	Level 12, Parmelia House, 191 St Georges Terrace, Perth WA, 6000

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? *

Yes

Person proposing to take the action organisation details

ABN/ACN	57160905706
Organisation name	NEOEN AUSTRALIA PTY. LTD.
Organisation address	2000 NSW

Person proposing to take the action details

Name	Arkar Arkar
Job title	State Leader WA
Phone	0416987586
Email	arkar@neoen.com
Address	Level 12, Parmelia House, 191 St Georges Terrace, Perth WA, 6000

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? *

No

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. *

Neoen Australia Pty Ltd has a satisfactory record of responsible environmental management. Neoen hold a large portfolio of renewable energy developments including solar and battery as well as a number of wind farms across Australia.

Since inception, Neoen has successfully designed, planned, and implemented a variety of renewable energy projects under the EPBC Act with satisfactory implementation of all relevant conditions under Commonwealth, State and Local approvals. Neoen is focused on remaining committed to best-practice approaches for managing any planning, environment, and social impacts. Neoen is also focused on ongoing engagement with relevant stakeholders throughout the lifecycle of their projects to deliver responsible stewardship.

Neoen Australia Pty Ltd has no past or present proceedings or prosecutions under Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources.

Previously referred actions under the EPBC Act by Neoen Australia Pty Ltd include:

- Narrogin Wind Farm, WA (2024/10004)
- Collie Battery Energy Storage System, WA (2023/09462)
- Mount Hopeful Windfarm, QLD (2021/9137)
- Kaban Green Power Hub, QLD (2018/8289)
- Goyder South Hybrid Renewable Energy Facility, SA (2021/8957)
- Territory Battery Energy Storage System, ACT (2021/8884)
- Western Downs Green Power Hub, QLD (2018/8301)
- Kentbruck Green Power Hub, VIC (2019/8510)
- Victorian Big Battery, VIC (2020/8614)
- Thunderbolt Energy Hub-Stage 1, NSW (2021/9048)
- Bulgana Green power Hub, VIC (2015/7460)
- Homsdale Wind Farm, SA (2012/6573)

The above actions and the action subject to this referral have and will continue to be undertaken in accordance with Neoen's company- wide environmental management policy.

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

Neoen Australia Pty Ltd have a company-wide Health, Safety and Environmental (HSE) Policy (Attachment 2) and Sustainability Framework (Attachment 3).

Key commitments of the HSE Policy are:

- Meeting or exceeding all applicable Health, Safety & Environmental laws or regulations
- Pursuing the objective of no harm to people, the company's assets and no damage to the environment or the local communities.
- Minimising adverse impacts of activities to the environment and the ecosystem, optimize the social impact to the communities in the surrounding of Neoen's facilities, and preserve the local cultural heritage
- Taking actions to prevent pollution and promoting the sustainability of the natural resources that we use
- Managing the HS&E matters as any other critical business activity in the company, with a continuous performance improvement mindset
- Providing guidance, support and training to our personnel and contractors in order to create and maintain a best in class HS&E culture

Key objectives of the Sustainability Framework are:

- Delivering clean energy to reduce emissions
- Promoting access to affordable and clean energy
- Speeding up the transition to a more sustainable future
- Striving to deliver excellence in sustainability

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	57160905706
Organisation name	NEOEN AUSTRALIA PTY. LTD.
Organisation address	2000 NSW

Proposed designated proponent details

Name	Arkar Arkar
Job title	State Leader WA
Phone	0416987586
Email	arkar@neoen.com
Address	Level 12, Parmelia House, 191 St Georges Terrace, Perth WA, 6000

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	57160905706
Organisation name	NEOEN AUSTRALIA PTY. LTD.
Organisation address	2000 NSW
Representative's name	Arkar Arkar
Representative's job title	State Leader WA
Phone	0416987586
Email	arkar@neoen.com
Address	Level 12, Parmelia House, 191 St Georges Terrace, Perth WA, 6000

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.

Same as Referring party information.

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

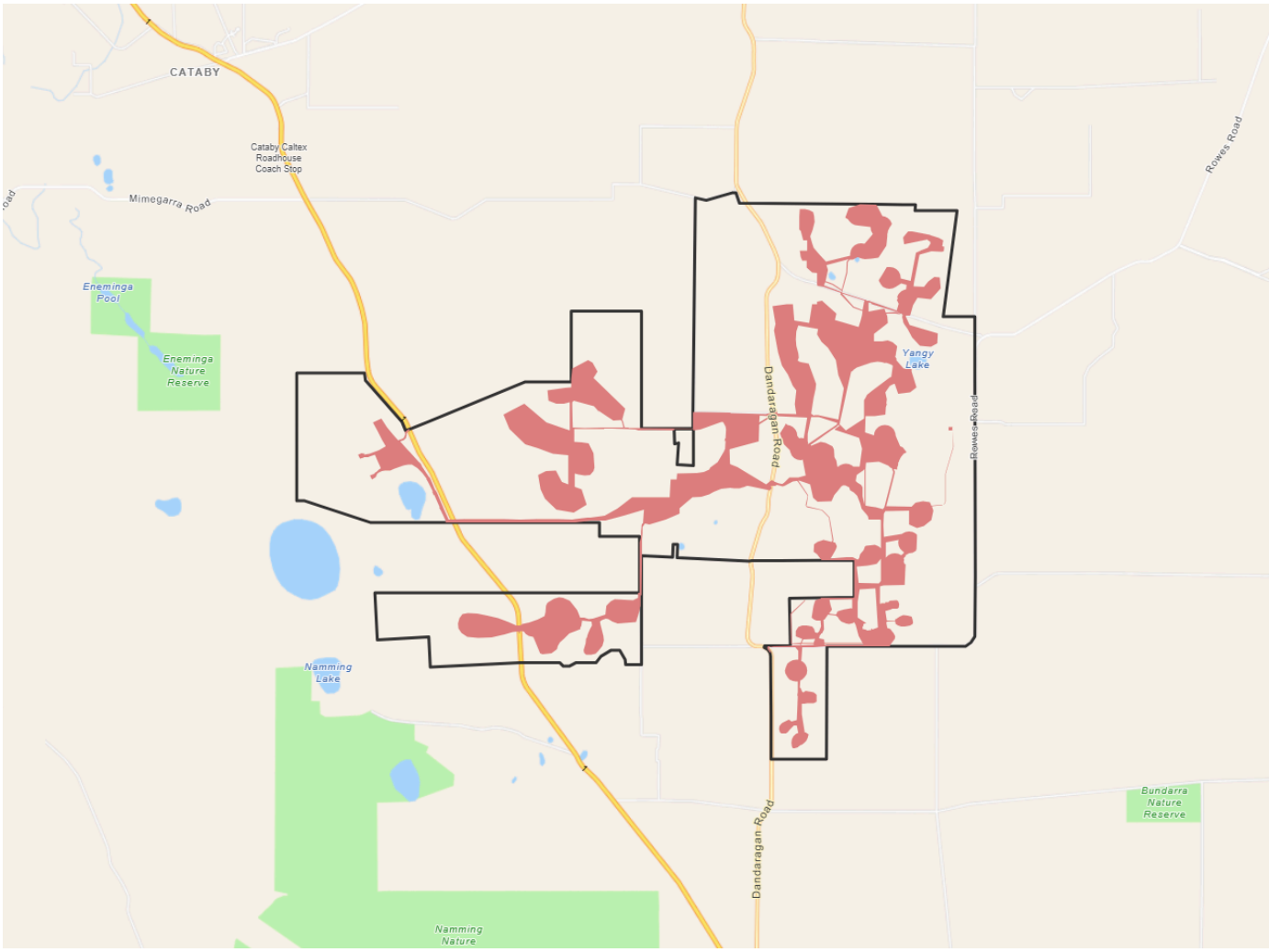
1.4 Payment details: Payment allocation

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

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 15639.07 Ha **Disturbance Footprint:** 3447.55 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

Lot 8 of Plan 47960, at the intersection of Rowes Rd and Dandaragan Rd, Yathroo

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

Western 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 lots intersecting the Project Area are primarily Freehold Land owned by private landholders, with some extents of public land comprised of reserves managed by state and local government.

The Proponent has legal access to freehold land under an ‘Option to Lease’ agreement with the landowners. Once construction has been completed the Option will be exercised and the land occupied by the Proponent’s assets will be covered by a lease, and access will be secured via easements.

The appropriate approvals will be sought for access to reserves managed by state and local government, and consultation has commenced with relevant stakeholders.

A full list of all Lots and Plans within the Project Area is provided in Att4-Lots and Plans in Project Area.

3. Existing environment

3.1 Physical description

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

For the purposes of this referral submission, the following distinct boundaries are discussed throughout the assessment and are illustrated in (see Att1-Pt1-MNES Report_Body, Figure 1.2, p7) the MNES:

- **Project Area**: refers to the boundaries of all involved land parcels where consent has been granted for development of the Project. The Project Area is 15,618 ha.
- **Indicative Project Footprint**: refers to the maximum area of land that will be cleared for installation of all Project infrastructure. It is based on the largest possible conceptual layout and has been used to calculate the maximum area of native vegetation clearing (10.28 ha of remnant native vegetation, 5.45 ha of isolated remnant trees and shrubs in cleared agricultural land, and 5.05 ha of planted native vegetation). Impact assessments within this document are based on the entire Indicative Project Footprint being cleared. The Indicative Project Footprint is 729.1 ha.
- **Development Corridor**: refers to the area within which all Project works and infrastructure will be confined. It encompasses the entire Indicative Project Footprint with buffers applied to provide the Project with a reasonable level of flexibility as it progresses into the detailed design phase. The Development Corridor is 3,443 ha.

The majority of vegetation in the Project Area has been mapped as 'Completely Degraded' (13,585 ha, 87%). This largely consists of land that has been cleared for pasture or cropping. Little to no native vegetation remains in these areas, although isolated remnant trees may occur.

A total of 4.3% of the Project Area was mapped as being in 'Degraded' condition (677.61 ha); these areas predominately consisted of native trees over no or very little understorey taxa, and high levels of introduced (weed) taxa.

A small portion of the assessed Project Area was mapped as being in 'Good' condition (63.7 ha, 0.4%) and a smaller portion was mapped as being in 'Very Good' condition (26.9 ha, 0.2%). No vegetation was mapped in 'Pristine' or 'Excellent' condition.

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

Current land uses within the Project Area include agricultural uses, comprising of large rural properties which are mainly utilised for grazing and dryland cropping. The Project Area has a long history of agricultural land use which is indicated by the condition and degraded nature of native vegetation that does occur.

The proposed land uses for the Project will be renewable energy generation and supply. Neoen have had ongoing discussions with landholders regarding the preferred siting of infrastructure on their properties and the existing agricultural land uses will continue alongside the Project during operations. Wind farm operations are considered to be a compatible land use for the co-siting of current agricultural land uses and therefore the land use is not expected to change significantly.

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

There are no natural features within the Project Area that are considered to be outstanding or otherwise unique within the region.

Key environmental features in proximity to the Project Area include (see Att1-Pt1-MNES Report_Body, Figure 1.1, p3)

- Namming Nature Reserve- located approximately 2 km west of the Project Area. This is protected for the purposes of flora and fauna conservation and is managed by Department of Biodiversity, Conservation and Attractions (DBCA).
- Moore River National Park- located approximately 10 km south of the Project Area.
- Bundarra, Eneminga, Jam Hill, Moochamulla and Quinns Hill Nature Reserves- all located within 10 km of the Project Area.
- Guraga Lake- located approximately 700 m west of the Project Area within Namming Nature Reserve.
- Badgingarra National Park- located approximately 29 km north-west of the Project Area.

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

Land within the Project Area is characterised by gently undulating slopes over an open landscape with terrain that ranges between approximately 100 – 270 m Australian Height Datum (AHD).

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.

The following flora, vegetation and fauna surveys and assessments were undertaken within and surrounding the Project Area in accordance with the relevant Commonwealth or State guidelines:

- Detailed and targeted flora and vegetation survey and assessment
- Basic and targeted fauna survey and assessment
- Targeted fauna habitat assessment
- Bird and bat utilisation surveys (five quarterly surveys undertaken)
- Targeted shorebird surveys (three undertaken)

Further details on each of these are provided below and in Att1-Pt1-MNES Report_Body, Section 6.2:

Threatened Ecological Communities

Interrogation of the Department of Climate Change, Energy, The Environment and Water's (DCCEEW) Protected Matter's Search Tool (PMST) database returned five Threatened Ecological Communities (TEC) likely to occur in the Desktop Study Area (Project Area plus 20 km buffer).

Of these, the 'Banksia Woodlands of the Swan Coastal Plain' TEC is considered to occur within the Project Area. Identifying the occurrence of the TEC was undertaken in accordance with the stepwise process outlined in the Approved Conservation Advice for this community (DoEE, 2016b).

Thirteen (13) patches of this TEC comprising a total area of 41.3 ha have been recorded within the areas of the Project Area subject to flora and vegetation surveys.

None of the remaining significant ecological communities were recorded or are considered to occur in the Project Area.

Flora

A total of 248 discrete flora taxa, including 45 introduced taxa were recorded during Project flora and vegetation surveys. The 248 flora taxa represent a total of 53 families and 146 genera. The most well-represented families were Myrtaceae (36 taxa), Fabaceae (24 taxa), Proteaceae (23 taxa), Poaceae (17 taxa) and Asteraceae (16 taxa).

Ten (10) individuals of one Threatened taxon listed under the EPBC Act (Grevillea curviloba) were recorded in an area of planted vegetation outside its natural range. *Grevillea curviloba* (T) has a restricted distribution that lies outside the Project Area. This taxon is a common cultivar and is often planted outside of its range throughout Perth and the southwest. It is likely that the 10 individuals recorded were either planted or are a garden escape. All recorded individuals are located outside the Development Corridor and Indicative Project Footprint.

No other threatened flora species under the EPBC Act were recorded during surveys.

Thirty-one (31) threatened flora species were identified in the PMST report as "likely", "may", or "known" to occur within the Desktop Study Area. There is a low likelihood of threatened flora taxa being present within the Indicative Project Footprint.

Fauna

Twelve broad fauna habitat types were identified within the Project Area, with the majority (11,014.3 ha, 70.5%) being categorised as 'Cleared', mainly consisting of paddocks and areas of infrastructure. The second largest habitat type extent in the Project Area is 'Scattered Trees' (2,281.9 ha, 14.6%), noting that a large proportion of this mapped habitat type comprises bare paddock in between isolated trees. The full list and area of the various fauna habitats within the Project Area are provided in Table 6.5 of Att1-Pt1-MNES Report_Body, Section 6.3.

During the basic and targeted terrestrial fauna surveys a total of 94 vertebrate fauna species were recorded in the Fauna Survey Area across 46 families. This includes three species of amphibian, four reptiles, 75 birds and 12 mammals. An additional 52 new bird and bat species were identified during the subsequent

BBUS, resulting in an overall total of 127 bird and bat species being recorded.

Eight EPBC listed fauna species (all birds) were recorded within the Project Area during the various BBUS and terrestrial fauna surveys completed to date. These are:

- Carnaby's Black-Cockatoo (*Zanda latirostris*) – Endangered
- Forest Red-tailed Black-Cockatoo (*Calyptorhynchus banksii naso*) – Vulnerable
- Black-tailed Godwit (*Limosa limosa*) – Endangered and Migratory
- Common Greenshank (*Tringa nebularia*) – Endangered and Migratory
- Sharp-tailed Sandpiper (*Calidris acuminata*) – Vulnerable and Migratory
- Wood Sandpiper (*Tringa glareola*) – Migratory
- Red-necked Stint (*Calidris ruficollis*) – Migratory
- Ruff (*Calidris pugnax*) – Migratory.

An additional six EPBC listed threatened or migratory fauna species were not recorded in the Project Area however were assessed as having a moderate or higher likelihood of occurrence:

- Curlew Sandpiper (*Calidris ferruginea*) – Critically Endangered and Migratory
- Common Sandpiper (*Actitis hypoleucos*) – Migratory
- Glossy Ibis (*Plegadis falcinellus*) – Migratory
- Pacific Golden Plover (*Pluvialis fulva*) – Migratory
- Long-toed Stint (*Calidris subminuta*) – Migratory
- Fork-tailed Swift (*Apus pacificus*) – Migratory.

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

The Project Area is located across two bioregions, being the Swan Coastal Plain (SWA) and Gearldton Sandplains (GS) bioregions, as defined by the Interim Biogeographic Regionalisation for Australia (IBRA). The SWA bioregion accounts for 99.3% of the Project Area.

The Project Area occurs across seven vegetation system associations (VSAs), with Dandaragan_999 being the most prominent, covering 72.8% (11,363 ha) of the Project Area. The full breakdown is provided in Table 6.2 of Att1-Pt1-MNES Report_Body, Section 6.2.

Eight native vegetation types (VT) were identified and mapped within the Project Area through floristic composition classification. The eight mapped VTs cover 768 ha (4.9 %) of the Project Area, however it should be noted that 1,168 ha of the Project Area was not surveyed as it will be avoided. The surveyed area contains blocks of native vegetation likely to be in Good condition or better.

Several Highly Modified Areas (HMAs) were also mapped within the Project Area, with these being areas where natural vegetation has been almost or entirely removed, cleared, or replaced with introduced or non-endemic taxa. Paddocks and Infrastructure are the dominant HMA and account for 83% of the surveyed Project Area.

Further details on the VTs and HMAs identified within the Project Area are presented in Table 6.3 and illustrated in Figure 6.3 of Att1-Pt1-MNES Report_Body, Section 6.2.

The Project Area intersects five land systems, with the Dandaragan System being the most dominant, covering 65% of the Project Area.

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.

One Commonwealth heritage place (Lancelin Defence Training Area) was returned from the DCCEEW PMST search of the Desktop Study Area. It was noted as being in the buffer area only. Mapping shows it is located 13 km West of the Project Area.

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

A desktop Aboriginal and historical heritage due diligence assessment has been undertaken for the Project Area.

The Project Area is covered by the South West Settlement Indigenous ILUA - the Yued Indigenous Land Use Agreement.

A search of the DPLH Aboriginal Cultural Heritage Inquiry System (ACHIS) found two Registered Aboriginal cultural heritage sites within the Project Area: Iluka Cataby 11 (ACH-00020233) and Iluka Cataby 12 (ACH-00020234). These sites have been avoided by the Project.

Neoen has undertaken engagement with the Yued Aboriginal Corporation, with a Yued heritage protection Agreements (YHPA) signed on 28 May 2025 (see Att7-Pt1-YHPA and Att7-Pt2-YHPA). Neoen has committed to completing heritage surveys prior to Project ground disturbance and implementing appropriate Aboriginal cultural heritage controls in consultation with the Yued Aboriginal Corporation.

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. *

Surface Water

The Project Area is located within the Moore–Hill Rivers Basin and the Minyulo–Caren Caren catchment.

The Minyulo-Caren Caren catchment comprises Lake Guraga, a large saline/brackish lake, and a second saline lake, Namming Lake is located 1.5 km south of Lake Guraga

Guraga Lake, which is listed on the Directory of Important Wetlands (DBCA-045), is located approximately 700 m west of the Project Area. Guraga Lake, and numerous other wetlands present on the Lesueur Sandplains, may provide suitable habitat for migratory shorebirds and other waterbirds that occur within the region. The Project Area also includes Lake Yangy, which lies within the Dandaragan Plateau and feeds into the Caren Caren Brook.

Caren Caren Brook is the main watercourse running through the Project Area. It traverses the central portion of the Project Area in a north–south direction. It is a non-perennial drainage line and is classified as a minor river.

There are no Ramsar sites located within 10 km of the Project Area.

Groundwater

The Project Area is located within the Gingin Proclaimed Groundwater Area, and the majority of the Project Area intersects the Moore River and Certain Tributaries Proclaimed Surface Water Area.

There are several bores, wells and other groundwater sampling sites within a 10 km radius of the Project Area that are identified as potential water supply for the Project and which connect to the Leederville aquifer which is a confined aquifer and sits below the Parmelia aquifer.

Groundwater Dependent Ecosystems

Groundwater Dependent Ecosystems (GDEs) with a low to high potential for groundwater interaction are present in the Project Area, based on mapping by the Bureau of Meteorology. These potential GDEs are the medium woodland' of the 'Moore-Hill Rivers Region' (low potential for groundwater interaction), medium woodland' of the 'Moore-Hill Rivers Region' (medium potential for groundwater interaction), low woodland', 'bare areas; salt lakes' of the 'Moore-Hill Rivers Region' (high potential for groundwater interaction). GDE mapping by the Bureau of Meteorology classifies ecosystems based on the potential for dependence on groundwater. The GDE mapping for Western Australia was derived in 2012 using remote sensing from Landsat and MODIS, with GIS analysis. Accuracy of the dataset is considered high-level and limited.

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.

—

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. *

No World Heritage Places have been identified within the Project Area or within a 20km radius of the Project Area according to results of the DCCEEW PMST.

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. *

No National Heritage Places have been identified within the Project Area or within a 20km radius of the Project Area according to results of the DCCEEW PMST

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. *

No Ramsar wetlands have been identified within the Project Area or within a 20km radius of the Project Area according to results of the DCCEEW PMST.

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
No	No	Acacia forrestiana	Forest's Wattle
No	No	Andersonia gracilis	Slender Andersonia
No	No	Anigozanthos viridis subsp. terraspectans	Dwarf Green Kangaroo Paw
No	No	Aphelocephala leucopsis	Southern Whiteface
No	No	Banksia fuscobractea	Dark-bract Banksia
No	No	Banksia mimica	Summer Honeypot
No	No	Caleana dixonii	Sandplain Duck Orchid
Yes	Yes	Calidris acuminata	Sharp-tailed Sandpiper
Yes	Yes	Calidris ferruginea	Curlew Sandpiper
Yes	Yes	Calyptorhynchus banksii naso	Forest Red-tailed Black-Cockatoo, Karrak
No	No	Calyptorhynchus latirostris	Carnaby's Cockatoo, Short-billed Black-Cockatoo
No	No	Chamelaucium lullfitzii	Gingin Wax
No	No	Conospermum densiflorum subsp. unicephalatum	One-headed Smokebush
No	No	Dasyurus geoffroii	Chuditch, Western Quoll
No	No	Drakaea elastica	Glossy-leafed Hammer Orchid, Glossy-leaved Hammer Orchid, Warty Hammer Orchid
No	No	Egernia stokesii badia	Western Spiny-tailed Skink, Baudin Island Spiny-tailed Skink
No	No	Eucalyptus dolorosa	Dandaragan Mallee, Mount Misery Mallee
No	No	Eucalyptus leprophloia	Scaly Butt Mallee, Scaly-butt Mallee

Direct impact	Indirect impact	Species	Common name
No	No	Grevillea curviloba subsp. incurva	Narrow curved-leaf Grevillea
No	No	Hakea megalosperma	Lesueur Hakea
No	No	Hemiandra gardneri	Red Snakebush
No	No	Leipoa ocellata	Malleefowl
No	No	Leucopogon obtectus	Hidden Beard-heath
Yes	Yes	Limosa limosa	Black-tailed Godwit
No	No	Macarthuria keigheryi	Keighery's Macarthuria
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Parantechinus apicalis	Dibbler
No	No	Ptychosema pusillum	Dwarf Pea
No	No	Rostratula australis	Australian Painted Snipe
No	No	Thelymitra stellata	Star Sun-orchid
Yes	Yes	Tringa nebularia	Common Greenshank, Greenshank
Yes	Yes	Zanda latirostris	Carnaby's Black Cockatoo, Short-billed Black-cockatoo

Ecological communities

Direct impact	Indirect impact	Ecological community
Yes	Yes	Banksia Woodlands of the Swan Coastal Plain ecological community
No	No	Tuart (Eucalyptus gomphocephala) Woodlands and Forests of the Swan Coastal Plain ecological community

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. *

Field surveys have recorded the following threatened species and ecological communities in the Project Area:

- Carnaby's Black-Cockatoo (*Zanda latirostris*) – Endangered
- Forest Red-tailed Black-Cockatoo (*Calyptorhynchus banksii naso*) – Vulnerable
- Black-tailed Godwit (*Limosa limosa*) – Endangered and Migratory
- Common Greenshank (*Tringa nebularia*) – Endangered and Migratory
- Sharp-tailed Sandpiper (*Calidris acuminata*) – Vulnerable and Migratory
- Banksia Woodlands of the Swan Coastal Plain ecological community – Endangered
- *Grevillea curviloba* - Endangered

In addition to the above, the Curlew Sandpiper (*Calidris ferruginea* – Critically Endangered and Migratory) is determined to have high likelihood of occurrence in the Project Area.

Suitable habitat has been identified within the Project Area for the Threatened fauna species listed above.

Thirteen (13) patches of 'Banksia Woodlands of the Swan Coastal Plain' TEC comprising a total area of 41.3 ha have been recorded within areas of the Project subject to flora and vegetation surveys. 9.9 ha of this TEC have been mapped as being in 'Very Good' condition, 20.2 ha in 'Good' Condition and 11.2 in 'Degraded' condition.

Ten (10) individuals of *Grevillea curviloba* were recorded in an area of planted vegetation outside its natural range. *Grevillea curviloba* has a restricted distribution that lies outside the Project Area. This taxon is a common cultivar and is often planted outside of its range throughout Perth and the southwest. It is likely that the 10 individuals recorded were either planted or are a garden escape. All recorded individuals are located outside the Development Corridor and Indicative Project Footprint.

Potential direct and indirect impacts to these threatened species and ecological communities before avoidance and mitigation measures are applied include:

- Loss of fauna habitat
- Degradation of fauna habitat
- Fragmentation of fauna populations
- Displacement of fauna
- Vehicle strikes
- Wind turbine collisions
- Barotrauma
- Vegetation clearing
- Edge effects
- Introduction and spread of weeds and pests
- Elevated dust

Further details are provided in Att1-Pt1-MNES Report_Body (see Section 7).

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

No

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

Significant impact assessments have been completed for the Threatened species listed in Att1-Pt1-MNES Report_Body, Section 4.1.4. The results of the Significant Impact Assessments are summarised below with further details provided in Att13-MNES Report_Appendix I.

Banksia Woodlands of the Swan Coastal Plain (TEC)

Thirteen (13) patches of the 'Banksia Woodland of the Swan Coastal Plain' TEC comprising a total area of 41.3 ha occur within the Project Area. No patches (either wholly or partially) of the TEC were in 'Pristine', 'Excellent', or 'Very Good' condition.

The Project is not likley to have a significant impact on the TEC for the following reasons:

- Clearing will not exceed 0.11 ha of TEC removal.
- TEC clearing is restricted to an area of Degraded TEC.
- The adjacent Good and Very Good condition TEC patches will be avoided and indirect impacts managed via implementation of the Project CEMP.
- The Project is highly unlikely to modify or destroy abiotic factors necessary for the TECs survival.
- No land use alterations are proposed that would modify water quality or availability, or nutrient balances necessary to the survival of the TEC.

Black-Cockatoo Species

Two species of threatened Black-Cockatoos have been recorded within the Project Area during the field survey program

The Carnaby's Black-Cockatoo has been recorded on 80 occasions to date during the field survey program, with a maximum flock size of approximately 200 recorded. The Forest Red-tailed Black-Cockatoo was recorded during the Winter 2025 BBUS and the targeted fauna habitat assessment undertaken in June 2025. Flock sizes ranged from two to eight individuals. The species was not recorded during the Spring 2024, Summer 2025, Autumn 2025 and Spring 2025 bird and bat utilisation surveys (BBUS), indicating that it is an intermittent and transient visitor to the Project Area that occurs in small numbers when present

A summary of potential impacts associated with habitat loss and direct mortality are summarised below.

Habitat Loss

The Project has avoided:

- All high-quality foraging value habitat (Site condition score of 6).
- Clearing of 5.70 ha of Carnaby's Black-Cockatoo moderate to high foraging value habitat (Site condition score of 5) mapped in the Development Corridor, with clearing of moderate to high foraging habitat limited to 0.65 ha.
- Clearing of 0.89 ha of Forest Red-tail Cockatoo moderate to high foraging value habitat (Site condition score of 5) mapped in the Development Corridor, with clearing of moderate to high foraging habitat limited to 0.03 ha.
- Clearing of 466.85 ha (or 99.86%) of moderate to high and high quality foraging habitat (Site condition score of 5 or 6) mapped in the Project Area based on broader scale habitat mapping.
- Clearing Rank 1 and Rank 2 potential Black-Cockatoo nest-trees.
- Known roost sites within the Project Area.

The Project has sought to minimise the clearing of native vegetation as far as practicable, culminating in clearing limits of 10.28 ha of remnant native vegetation, 5.45 ha of isolated remnant trees in cleared agricultural land and 7.33 ha of planted vegetation (native and non-native). The foraging values of this vegetation to both species of Black-Cockatoos are presented in Table 9.1 of Attachment MNES .

The proposed clearing of Black-Cockatoo foraging habitat of any value by the Project represents approximately 0.05% of the potentially suitable foraging habitat in remnant vegetation within 12km of the Project Area (see Att1-Pt1-MNES Report_Body, Section 6.3.2.1).

A potential Black-Cockatoo nest assessment recorded 560 potential nest-trees (DBH > 500 mm) within the Development Corridor, 112 of which lie in the Indicative Project Footprint. No active nests (Rank 1) were recorded within the Development Corridor and all Rank 2 trees will be avoided.

Two roosting sites have been identified during the field survey program both of which lie outside the Development Corridor.

Based on the above, residual impacts to Black-Cockatoo habitat is unlikely to result in a significant impact to either Carnaby's Black-Cockatoo or Forest Red-Tailed Black Cockatoo.

Direct Mortality

Direct mortality as a result of the Project is not likely to have a significant impact on Black-Cockatoos through the adoption of a minimum blade tip height of 59 m AGL and through implementing the Project Bird and Bat Adaptive Management Plan (See Att1-Pt8-MNES Report_Appendix D).

Collision with turbines and turbine blades poses a direct mortality risk to Black-Cockatoos. Flight heights for both Carnaby's Black-Cockatoo (42 records) and Forest Red-tailed Black-Cockatoo (1 record) were recorded as part of BBUS completed to date with the results presented in Table 7.5 of (Att1-Pt8-MNES Report_Appendix D). Neither of the species were recorded flying within the Rotor Swept Area (RSA), with one to two individuals of Carnaby's Black-Cockatoo being recorded at a maximum flight height of 50 m AGL on three occasions. The Exposure Risk Model (ERM) developed for the species shows that the majority (99%) of flight time for the species occurred below 30 m AGL.

The Forest Red-tailed Black-Cockatoo was recorded flying at a maximum height of 8 m AGL, however this is based on a single flight observation recorded during the BBUS. It should be noted however that both Carnaby's Black-Cockatoo and Forest Red-tailed Black-Cockatoo exhibit similar flight behaviours.

Neoen is also collecting Black-Cockatoo flight height data for other potential wind farm projects in the Wheatbelt region. To date, flight data has been recorded for 80 Carnaby's Black-Cockatoo flights with the maximum height observed being 50m AGL. For the Forest Red-tailed Black-Cockatoo, data has been recorded for 16 flight heights, with the maximum flight height recorded being 40m AGL.

Based on the above understanding of Black-Cockatoo flight height, and through the adoption of a minimum blade tip-height of 59m AGL and measures in the BBAMP, direct mortality to Black-Cockatoos as a result of the Project is unlikely to have a significant impact on Black-Cockatoos.

Threatened Shorebird Species

Three Threatened shorebird species have been recorded within the Project Area (Black-tailed Godwit, Common Greenshank and Sharp-tailed Sandpiper) as part of field surveys to date. Additionally, the Curlew Sandpiper has a high likelihood of occurring in the Project Area.

All four of these species are non-breeding migrant visitors to Australia during the austral summer. All records within the Project Area have been in the wetlands west of Brand Highway. These wetlands are considered to provide the most suitable habitat for migratory shorebirds in the Project Area. All records were solely recorded during the Summer 2025 BBUS, and the number of individuals did not exceed five for any of these species. The low number of individuals recorded suggests low-density and limited duration usage of the most suitable wetland habitats in the Project Area.

EPBC Act Policy Statement 3.21 identifies loss of habitat, degradation of habitat, increased disturbance and direct mortality as the primary significant impacts on migratory shorebird species. A brief assessment against these is provided below, with a more detailed assessment against the *Significant Impact Guidelines 1.1* provided in Att13-MNES Report_Appendix I.

Habitat Loss

The most suitable and preferred Threatened shorebird habitat within the Project Area is limited to three wetlands west of Brand Highway totaling 264 ha. The much smaller Lake Yangy (14.5 ha) to the east has the potential to support migratory shorebirds, however, is likely not as suitable or preferred as the wetlands to the west of Brand Highway.

Direct habitat loss will be limited to 1 ha of degraded vegetation on the edge of one of the wetlands to the west, that will be rehabilitated at the end of construction. The proposed clearing area is unlikely to contain foraging habitat.

Degradation of habitat

The wetlands west of Brand Highway where Threatened shorebirds have been recorded are currently subjected to agricultural pressures, and the vegetation surrounding the wetlands has been mapped as being in Degraded and Completely Degraded condition.

The main ancillary infrastructure to be constructed west of Brand Highway are the BESS, substation and Western Power terminal. Through site design and implementation of the CEMP, wetland hydrology and ecological function is expected to remain unaffected as a result of construction and operation activities.

Increased disturbance

The Threatened shorebirds recorded in the Project Area to date are mobile non-breeding species that use a wide network of coastal environments and inland wetlands across Australia during the austral summer. Turbines have been setback more than 3.5 km from wetlands in the west, within the Project Area, where Threatened shorebirds have been recorded. Other ancillary infrastructure such as the BESS, substation and Western Power terminal have been set back over 175 m from the closest edge of these wetlands which is more than the minimum 165 m buffer recommended in EPBC Act Policy Statement 3.21 (DoEE, 2017).

Direct Mortality

Collision with turbines and turbine blades during local flights pose the key direct mortality risk to Threatened shorebirds.

Threatened shorebirds are known or considered likely to occur at four of the Project Area wetlands. Three of these wetlands are adjacent to one another in the west of the Project Area and are located 3.5 km from the nearest turbine. The fourth wetland is Lake Yangy found in the eastern part of the Project Area. Due to its smaller size, higher pH, and lower habitat suitability, it is less likely to attract notable numbers of Threatened shorebirds, with any presence also expected to be of shorter duration.

To date, no Threatened shorebird flight height data has been recorded as part of the field program, and Threatened shorebirds have only been recorded in the wetlands west of Brand Highway that are setback 3.5 km from turbines.

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

No

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

The Project is not considered to be a controlled action as it is not likely to have a significant impact on Threatened species and Ecological Communities because:

- The Project Area has been selected and the Project design has been optimised so that 97% of proposed ground disturbance is in previously cleared areas.
- No Threatened flora has been identified in the Development Corridor and it is unlikely the Project will result in the clearing of threatened flora.
- Clearing of TEC in Good condition or better has been avoided. Clearing of TEC will be limited to 0.11 ha of Degraded condition TEC.
- The Project will not clear more than 10.28 ha of native vegetation, 5.45 ha of isolated remnant trees, 5.05 ha of planted native vegetation and 2.28 ha of planted non-native trees and shrubs.
- Native vegetation in Very Good or better condition has been avoided. The majority (90%) of vegetation proposed to be cleared is in Degraded or Completely Degraded condition. The remaining 10% (2.23 ha) in Good condition is unable to be avoided as it is typically associated with road verges that infrastructure needs to cross.
- No vegetation of high-quality Black-Cockatoo foraging value (site condition score of 6) will be cleared. Clearing of vegetation with moderate to high Black-Cockatoo foraging value (site condition score of 5) will not exceed 0.65 ha. The remaining vegetation proposed to be cleared has moderate or lower Black-Cockatoo foraging value (Site condition 4 or lower).
- The proposed clearing of vegetation with any Black-Cockatoo foraging value represents approximately 0.05% of the potentially suitable foraging habitat in remnant vegetation within 12km of the Project Area.
- All Rank 1 (trees with activity at hollow observed) and Rank 2 (trees with hollows of suitable size with chew marks visible) Black-Cockatoo nest-trees have been avoided.
- The Project will adopt a minimum blade tip height of 59 m above ground level, which is above the recorded and typical flight height of Black-Cockatoos, which reduces the potential for Black-Cockatoo collision with turbines.
- Turbines have been setback more than 3.5 km from wetlands in the west of the Project Area, where Threatened migratory shorebirds have been recorded.
- Clearing of wetland habitat likely to support Threatened migratory shorebirds will not exceed 1 ha. The cleared area comprises of degraded wetland vegetation unlikely to contain foraging habitat. This area will be rehabilitated at the end of construction.
- Significant Impact Assessments have been undertaken for the Threatened Species and Ecological Communities with a moderate or greater likelihood of occurrence in the Project Area Att1-Pt13-MNES Report_Appendix I. Each Significant Impact Assessment determined that the Project would not pose a significant impact to the species assessed.

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. *

Avoidance

The Project has been designed to avoid:

- Key blocks of native remnant vegetation (300ha) within the Project Area presumed to be in Good condition or better.
- TEC in Good condition or better
- Native vegetation in Very Good condition or better
- Vegetation of high-quality Black-Cockatoo foraging value (Site condition score of 6).
- 466.85 ha (or 99.86%) of moderate to high and high-quality foraging habitat (Site condition score of 5 or 6) mapped in the Project Area based on broader scale habitat mapping.
- Rank 1 (trees with activity at hollow observed) and Rank 2 (trees with hollows of suitable size with chew marks visible) Black-Cockatoo nest-trees
- Placing turbines within 3.5 km of the wetlands in the West of the Project Area where migratory shorebirds have been recorded to date.
- Permanently clearing wetland habitat mapped as likely to support migratory shorebirds.

Mitigation

The Project will implement a CEMP which includes a management approach and actions to limit and reduce the potential impacts on flora, vegetation and fauna, including Threatened species and Ecological Communities. A Preliminary CEMP has been developed to support this referral and a copy is provided in Att1-Pt10-MNES Report_Appendix G.

Operational impacts to birds and bats will be managed through a Bird and Bat Adaptive Management Plan (BBAMP). A Preliminary BBAMP has been developed to support this referral and a copy is provided in Att1-Pt8-MNES Report_Appendix D.

The following mitigation measures as related to Threatened species and Ecological Communities will be implemented:

- Approved native vegetation clearing area boundaries will be demarcated prior to clearing, and clearing of native vegetation will not exceed 10.28 ha of native vegetation, 5.45 ha of isolated remnant trees, 5.05 ha of planted native vegetation and 2.28 ha of planted non-native trees and shrubs.
- Known Rank 1 and Rank 2 Black-Cockatoo nesting trees within 50 m of clearing boundaries will be clearly tagged as “No-go zone” prior to clearing. This could be in the form of flagging or fencing.
- Disturbance of Rank 3 (potentially suitable hollow visible but no chew marks present at entrance; or potentially suitable hollow suspected to be present) trees will be minimised through micro-siting where practicable.
- Areas planned for native vegetation clearing will be inspected for native fauna immediately prior to undertaking land clearing by a suitably qualified fauna spotter. This will include ensuring that no trees being removed are housing Black-Cockatoos, chicks, or eggs.
- Where threatened or migratory species are encountered during construction, any activities in proximity (<10 m) to their location will cease until they are no longer present. Handling of such fauna is not permitted unless a Section 40 approval has been granted from DBCA.
- Vegetation clearing will be undertaken progressively and in stages so that only a small subset of the Project footprint is impacted at any one time. The clearing will be undertaken towards adjacent native vegetation to allow fauna to move into adjacent native vegetation ahead of the clearing activity.
- All ground disturbing plant and equipment will enter and leave the site clean and free of weeds or dieback.
- Prior to entering the Project Area, the origin of fill material will be determined and certified where applicable. Where practicable, the fill should be from a quarry (i.e. not reused from another site) that has a Dieback Management Plan in place.

- Construction and operation personnel will be educated on the potential presence for fauna, in particular Black-Cockatoos and migratory shorebirds.
- Training/information requirements will be in place for all personnel working on the Project, including but not limited to inductions, daily toolbox talks and/or site walk overs which discuss the management measures or risks of a particular locations.
- The Project BBAMP will be implemented throughout operations.
- The Project CEMP will be implemented throughout construction. An operational EMP will be developed for the operational component of the Project.

Further mitigation measures are provided in Att1-Pt11-MNES Report_Appendix G.

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

Although residual impacts remain after the application of the mitigation hierarchy, when assessing these impacts against criteria in the Significant Impact Guidelines 1.1, these are unlikely to be considered significant due to the extent, fragmentation and quality of native vegetation proposed for clearing, the strong application of avoidance, and the implementation of mitigation measures to reduce the risk of indirect impacts.

An environmental offset is still likely to be required under the State Part V EP Act Native Vegetation Clearing Permit process and will be prepared in accordance with the WA Environmental Offset Policy 2011 and Environment Offset Guidelines 2014.

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	Yes	Actitis hypoleucos	Common Sandpiper
No	No	Apus pacificus	Fork-tailed Swift
Yes	Yes	Calidris acuminata	Sharp-tailed Sandpiper
Yes	Yes	Calidris ferruginea	Curlew Sandpiper
No	No	Calidris melanotos	Pectoral Sandpiper
Yes	Yes	Calidris ruficollis	Red-necked Stint
Yes	Yes	Calidris subminuta	Long-toed Stint
Yes	Yes	Limosa limosa	Black-tailed Godwit
No	No	Motacilla cinerea	Grey Wagtail
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Pandion haliaetus	Osprey
Yes	Yes	Philomachus pugnax	Ruff (Reeve)
Yes	Yes	Plegadis falcinellus	Glossy Ibis
Yes	Yes	Pluvialis fulva	Pacific Golden Plover
Yes	Yes	Tringa glareola	Wood Sandpiper
Yes	Yes	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. *

Field surveys have recorded the following migratory species in the Project Area:

- Black-tailed Godwit (*Limosa limosa*) – Endangered and Migratory
- Common Greenshank (*Tringa nebularia*) – Endangered and Migratory
- Sharp-tailed Sandpiper (*Calidris acuminata*) – Vulnerable and Migratory
- Wood Sandpiper (*Tringa glareola*) – Migratory
- Red-necked Stint (Calidris ruficollis) – Migratory
- Ruff (Calidris pugnax) – Migratory.

An additional six Migratory species were not recorded in the Project Area however were assessed as having a moderate or higher likelihood of occurrence:

- Curlew Sandpiper (*Calidris ferruginea*) – Critically Endangered and Migratory
- Common Sandpiper (Actitis hypoleucos) – Migratory
- Glossy Ibis (*Plegadis falcinellus*) – Migratory
- Pacific Golden Plover (*Pluvialis fulva*) – Migratory
- Long-toed Stint (*Calidris subminuta*) – Migratory
- Fork-tailed Swift (*Apus pacificus*) – Migratory

Suitable habitat has been identified within the Project Area for the Migratory species listed above.

Potential direct and indirect impacts to these Migratory species before avoidance and mitigation measures are applied include:

- Loss of fauna habitat
- Degradation of fauna habitat
- Fragmentation of fauna populations
- Displacement and disturbance of fauna
- Vehicle strikes
- Wind turbine collisions
- Barotrauma
- Introduction and spread of weeds and pests

Further details are provided in Att1-Pt1-MNES Report_Body, Section 7.

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. *

Six Migratory species have been recorded within the Project Area as part of field surveys to date. Three of these also have a Threatened status. An additional six Migratory species have a high or moderate likelihood of occurring in the Project Area.

All 12 of these species are non-breeding migrant visitors to Australia during the austral summer, with the majority migrating from Europe and Russia. Eleven of the 12 species are migratory shorebirds, most of which have a preference for coastal environments with some utilising near-shore wetlands and other water bodies. The fork-tailed swift is not a shorebird and is almost exclusively aerial. As a result of this, habitat impacts are not relevant or discussed for the fork-tailed swift.

All records of Migratory species have been in the wetlands west of Brand Highway. These wetlands are considered to provide the most suitable habitat for Migratory species in the Project Area. Five of the species were recorded during the Summer 2025 BBUS, and the number of individuals did not exceed five for any of these species. A total of 15 Wood Sandpiper were recorded on two separate occasions during the Basic and Targeted Fauna Survey in Spring 2024.

EPBC Act Policy Statement 3.21: *Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species* (DoEE, 2017) identifies loss of habitat, degradation of habitat, increased disturbance and direct mortality as the primary significant impacts on migratory shorebird species. A brief assessment against these is provided below, with more detailed assessments against the *Significant Impact Guidelines 1.1* provided in Appendix I of Attachment MNES.

Habitat Loss

Habitat loss as a result of the Project is not likely to have a significant impact on Migratory species.

The most suitable and preferred Migratory shorebird habitat within the Project Area is limited to three wetlands west of Brand Highway totaling 264 ha. The much smaller Lake Yangy (14.5 ha) to the east has the potential to support migratory shorebirds, however is likely not as suitable or preferred as the wetlands to the west of Brand Highway.

Direct habitat loss will be limited to 1 ha of degraded vegetation on the edge of one of the wetlands to the west, that will be rehabilitated at the end of construction. Although this area is within the area mapped as wetlands based on DBCA geomorphic wetlands spatial data, it is fringing vegetation adjacent to the wetland and is unlikely to contain foraging habitat.

Degradation of habitat

Habitat degradation as a result of the Project is not likely to have a significant impact on Migratory species.

The wetlands west of Brand Highway where Threatened species have been recorded are currently subjected to agricultural pressures, and the vegetation surrounding the wetlands has been mapped as being in Degraded and Completely Degraded condition.

The main ancillary infrastructure to be constructed west of Brand Highway are the BESS, substation and Western Power terminal. Construction of these facilities will be undertaken in accordance with the Project CEMP which sets out management measures to be implemented to protect the key environmental values of the area such as surface water, vegetation and fauna habitat.

Through site design and implementation of the CEMP, wetland hydrology and ecological function is expected to remain unaffected as a result of construction and operation activities.

Increased disturbance

The Project will not result in a level of disturbance that will significantly impact Migratory species.

The Migratory species recorded in the Project Area to date are mobile non-breeding species that use a wide network of coastal environments and inland wetlands across Australia during the austral summer. Turbines have been setback more than 3.5 km from wetlands in the west, within the Project Area, where Migratory

species have been recorded. Other ancillary infrastructure such as the BESS, substation and Western Power terminal have been set back over 175 m from the closest edge of these wetlands which is more than the minimum 165 m buffer recommended in EPBC Act Policy Statement 3.21 (DoEE, 2017).

Whilst there is the potential for temporary disturbance to Migratory species during construction of the BESS, substation and Western Power terminal, this will be limited to approximately 24 – 30 months and to the edges of the wetlands closest to the construction footprint. Adjacent wetlands, and the edges of wetlands set further back from the construction footprint can still be utilised by Migratory species if required.

Direct Mortality

Direct mortality as a result of the Project is unlikely to have a significant impact on Migratory species.

Collision with turbines and turbine blades during local flights pose the key direct mortality risk to Migratory species.

Migratory species are known or considered likely to occur at four of the Project Area wetlands. Three of these wetlands are adjacent to one another in the west of the Project Area and are located 3.5 km from the nearest turbine. The fourth wetland is Lake Yangy found in the eastern part of the Project Area. Due to its smaller size, higher pH, and lower habitat suitability, it is less likely to attract notable numbers of Migratory species, with any presence also expected to be of shorter duration.

To date, no Migratory species flight height data has been recorded as part of the field program, and Migratory species have only been recorded in the wetlands west of Brand Highway that are setback 3.5 km from turbines.

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. *

The Project is not considered to be a controlled action as there are unlikely to be significant impacts on Migratory species because:

- The Project Area has been selected and the Project design has been optimised so that 97% of proposed ground disturbance is in previously cleared areas.
- Turbines have been setback more than 3.5 km from wetlands in the west of the Project Area, where Migratory species have been recorded.
- Clearing of wetland habitat likely to support Migratory species will not exceed 1 ha. The cleared area comprises of degraded wetland vegetation unlikely to contain foraging habitat. This area will be rehabilitated at the end of construction.
- Through site design and implementation of the CEMP, wetland hydrology and ecological function is expected to remain unaffected as a result of construction and operation activities.
- Ancillary infrastructure such as the BESS, substation and Western Power terminal have been set back over 175 m from the closest edge of these wetlands which is more than the minimum 165 m buffer recommended in EPBC Act Policy Statement 3.21.

Significant Impact Assessments have been undertaken for the Migratory species with a moderate or greater likelihood of occurrence in the Project Area (Att1-Pt13-MNES Report_Appendix I). The Significant Impact Assessments determined that the Project will not likely result in a significant impact to the species assessed.

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. *

Avoidance (specific to Migratory species)

The Project has been designed to avoid:

- Placing turbines within 3.5 km of the wetlands in the West of the Project Area where Migratory species have been recorded to date.
- Permanently clearing wetland habitat mapped as likely to support migratory species.

Mitigation (specific to Migratory species)

The Project will be governed by a CEMP which includes a management approach and actions to limit and reduce the potential impacts on flora, vegetation and fauna, including Threatened species and Ecological Communities. A Preliminary CEMP has been developed to support this referral and a copy is provided in Attachment MNES, Appendix G.

Operational impacts to birds and bats will be managed through a Bird and Bat Adaptive Management Plan (BBAMP). A Preliminary BBAMP has been developed to support this referral and a copy is provided in Attachment MNES, Appendix D.

The following mitigation measures as related to Migratory species will be implemented:

- No wetland habitat where migratory species have been found to forage West of Brand Highway will be permanently cleared. Temporary clearing will be limited to 1 ha and this area will be rehabilitated at the end of construction.
- Areas planned for native vegetation clearing will be inspected for native fauna immediately prior to undertaking land clearing by a suitably qualified fauna spotter.
- Where threatened or migratory species are encountered during construction, any activities in proximity (<10 m) to their location will cease until they are no longer present. Handling of such fauna is not permitted unless a Section 40 approval has been granted from DBCA.
- Vegetation clearing will be undertaken progressively and in stages so that only a small subset of the Project footprint is impacted at any one time. The clearing will be undertaken towards adjacent native vegetation to allow fauna to move into adjacent native vegetation ahead of the clearing activity.
- All ground disturbing plant and equipment will enter and leave the site clean and free of weeds or dieback.
- Prior to entering the Project Area, the origin of fill material will be determined and certified where applicable. Where practicable, the fill should be from a quarry (i.e. not reused from another site) that has a Dieback Management Plan in place.
- Construction and operation personnel will be educated on the potential presence for fauna, in particular Black-Cockatoos and migratory species.
- Training/information requirements will be in place for all personnel working on the Project, including but not limited to inductions, daily toolbox talks and/or site walk overs which discuss the management measures or risks of a particular locations.
- The Project BBAMP will be implemented throughout operations.
- The Project CEMP will be implemented throughout construction. An operational EMP will be developed for the operational component of the Project.

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

No significant residual impacts to Migratory species are expected, and therefore no offsets are deemed required as a result of Project impacts on Migratory species.

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 does not involve any activities characterised as Nuclear Actions under Section 22 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

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 proposed action is an onshore project and not located in proximity to any Commonwealth Marine Area.

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 Western Australia and there is no interaction between project activities and 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 is neither a coal mining or coal seam gas 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. *

No Commonwealth Land has been identified within the Project Area and seven Commonwealth Lands have been identified with a 20km buffer of the Project Area according to results of the DCCEEW PMST.

No impacts are expected to these seven Commonwealth Lands as all are located outside the Project Area.

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. *

No Commonwealth Heritage Places Overseas have been identified within the Project Area or within a 20km radius of the Project Area according to results of the DCCEEW PMST.

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:

None

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)
- Threatened Species and Ecological Communities (S18)
- 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. *

Alternatives considered for the Project included locating it in a different area or a “do nothing” alternative.

Alternative areas for large-scale wind farms in the Wheatbelt to meet timelines for decarbonisation of the SWIS are limited due to the location of suitable or committed transmission infrastructure that does not require significant upgrades or long-distance transmission corridors to provide network access. These additional requirements may delay potential renewable projects by years and slow the overall transition of the State’s energy network to green energy, particularly within the South West Interconnected System (SWIS).

The Project is proposed to connect to an existing Western Power transmission line in the south-west and west of the Project Site that provides suitable network access with sufficient capacity to accommodate the Project. The required capacity will be provided by Western Power’s Clean Energy Link North, a major transmission upgrade project designed to support the integration and transfer of renewable energy from the northern parts of the network. The Clean Energy Link North project is scheduled for completion in 2027.

The “do nothing” alternative for the Project would further delay the clean energy transition and decarbonisation of energy networks in Western Australia which have been identified as key goals for the Western Australian government. A key threat for many ecosystems and species, but particularly the listed MNES species considered as part of this assessment, is climate change. Changes to rainfall, temperature extremes, and bushfires may accelerate the decline of these MNES species through a combination of range contractions in response to changing climatic conditions, impacts to suitable habitat from more intense and frequent bushfires, and effects on factors influencing breeding success and timing. Renewable energy projects are critical in addressing these challenges in the long-term by directly reducing emissions from energy production

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-P13-MNES Report_Appendix I.pdf Yathroo Wind Farm Significant Impact Assessment	10/12/2025	No	High
#2.	Document	Att1-Pt10-MNES Report_Appendix F.pdf Likelihood of Occurrence Assessment	02/12/2025	No	High
#3.	Document	Att1-Pt11-MNES Report_Appendix G.pdf Yathroo Wind Farm Preliminary Construction Environmental Management Plan	08/07/2025	No	High
#4.	Document	Att1-Pt12-MNES Report_Appendix H.pdf Yathroo Wind Farm Year One Bird and Bat Utilisation Summary Report	02/12/2025	Yes	High
#5.	Document	Att1-Pt12-MNES Report_Appendix H_REDACTED.pdf Yathroo Wind Farm Year One Bird and Bat Utilisation Summary Report	02/12/2025	No	High
#6.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	12/12/2025	Yes	High
#7.	Document	Att1-Pt1-MNES Report_Body_REDACTED.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	10/12/2025	No	High
#8.	Document	Att1-Pt2-MNES Report_Appendix A.pdf Yathroo wind farm Detailed and Targeted Flora and Vegetation Assessment	01/07/2025	Yes	High
#9.	Document	Att1-Pt2-MNES Report_Appendix A_REDACTED.pdf Yathroo wind farm Detailed and Targeted Flora and Vegetation Assessment - Part 1	01/07/2025	No	High
#10.	Document	Att1-Pt3-MNES Report_Appendix A.pdf Yathroo wind farm Detailed and Targeted Flora and Vegetation Assessment - Part 2	01/07/2025	No	High
#11.	Document	Att1-Pt4-MNES Report_Appendix A.pdf Yathroo wind farm Detailed and	01/07/2025	No	High

Targeted Flora and Vegetation Assessment - Part 3					
#12.	Document	Att1-Pt5-MNES Report_Appendix A.pdf Yathroo wind farm Detailed and Targeted Flora and Vegetation Assessment - Part 4	01/07/2025	Yes	High
#13.	Document	Att1-Pt5-MNES Report_Appendix A_REDACTED.pdf Yathroo wind farm Detailed and Targeted Flora and Vegetation Assessment - Part 4	01/07/2025	No	High
#14.	Document	Att1-Pt6-MNES Report_Appendix B.pdf Yathroo Wind farm Basic and Targeted Fauna Assessment	11/08/2025	Yes	High
#15.	Document	Att1-Pt6-MNES Report_Appendix B_REDACTED.pdf Yathroo Wind Farm Basic and Targeted Fauna Assessment	11/08/2025	No	High
#16.	Document	Att1-Pt7-MNES Report_Appendix C.pdf Yathroo Wind Farm Targeted Fauna Habitat Assessment	09/12/2025	Yes	High
#17.	Document	Att1-Pt7-MNES Report_Appendix C_REDACTED.pdf Yathroo Wind Farm Targeted Fauna Habitat Assessment	09/12/2025	No	High
#18.	Document	Att1-Pt8-MNES Report_Appendix D.pdf Yathroo Wind Farm Preliminary Bird and Bat Adaptive Management Plan	10/12/2025	Yes	High
#19.	Document	Att1-Pt8-MNES Report_Appendix D_REDACTED.pdf Yathroo Wind Farm Preliminary Bird and Bat Adaptive Management Plan	10/12/2025	No	High
#20.	Document	Att1-Pt9-MNES Report_Appendix E.pdf EPBC Act Protected Matters Report	05/11/2025	No	High
#21.	Document	Att2-Neoen HSE Policy.pdf Neoen HSE Policy	12/12/2025	No	High
#22.	Document	Att3-Neoen Sustainability Framework.pdf Neoen Sustainability Framework	12/12/2025	No	High
#23.	Document	Att4-Lots and Plans in Project Area.pdf Yathroo Wind Farm Lots and Plan in Project Area	12/12/2025	No	High
#24.	Document	Att5-Heritage Due Diligence Assessment.pdf	25/06/2025	No	High

Yathroo Wind Farm Heritage Due Diligence Assessment					
#25.	Document	Att7-Pt1-YHPA_REDACTED.pdf Yathroo Wind Farm Yued Heritage Protection Agreement - Part 1	28/05/2025	Yes	High
#26.	Document	Att7-Pt2-YHPA_REDACTED.pdf Yathroo Wind Farm Yued Heritage Protection Agreement - Part 2	28/05/2025	Yes	High

1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att6-Yathroo Community Engagement Plan.pdf Summary of social context for the Yathroo Wind Farm including the compilation of a social baseline profile for the Project, and a summary of engagement outcomes	11/12/2025	No	High
#2.	Document	Att7-Pt1-YHPA_REDACTED.pdf Yathroo Wind Farm Yued Heritage Protection Agreement - Part 1	27/05/2025	Yes	High
#3.	Document	Att7-Pt2-YHPA_REDACTED.pdf Yathroo Wind Farm Yued Heritage Protection Agreement - Part 2	27/05/2025	Yes	High

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

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2-Neoen HSE Policy.pdf Neoen HSE Policy	11/12/2025	No	High
#2.	Document	Att3-Neoen Sustainability Framework.pdf Neoen Sustainability Framework	11/12/2025	No	High

2.2.5 Tenure of the action area relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att4-Lots and Plans in Project Area.pdf Yathroo Wind Farm Lots and Plan in Project Area	11/12/2025	No	High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence

#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

3.1.2 Existing or proposed uses for the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

3.1.3 Natural features, important or unique values that applies to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

3.1.4 Gradient relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence

#1.	Document	Att5-Heritage Due Diligence Assessment.pdf Yathroo Wind Farm Heritage Due Diligence Assessment	24/06/2025	No	High
#2.	Document	Att7-Pt1-YHPA_REDACTED.pdf Yathroo Wind Farm Yued Heritage Protection Agreement - Part 1	27/05/2025	Yes	High
#3.	Document	Att7-Pt2-YHPA_REDACTED.pdf Yathroo Wind Farm Yued Heritage Protection Agreement - Part 2	27/05/2025	Yes	High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

4.1.4.6 (Threatened Species and Ecological Communities) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-P13-MNES Report_Appendix I.pdf Yathroo Wind Farm Significant Impact Assessment	09/12/2025	No	High
#2.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High
#3.	Document	Att1-Pt8-MNES Report_Appendix D.pdf Yathroo Wind Farm Preliminary Bird and Bat Adaptive Management Plan	09/12/2025	Yes	High

4.1.4.9 (Threatened Species and Ecological Communities) Why you do not think your proposed action is a controlled action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document				

Att1-Pt11-MNES Report_Appendix G.pdf Yathroo Wind Farm Preliminary Construction Environmental Management Plan			07/07/2025	No	High
#2.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High
#3.	Document	Att1-Pt3-MNES Report_Appendix A.pdf Yathroo wind farm Detailed and Targeted Flora and Vegetation Assessment - Part 2	30/06/2025	No	High
#4.	Document	Att1-Pt8-MNES Report_Appendix D.pdf Yathroo Wind Farm Preliminary Bird and Bat Adaptive Management Plan	09/12/2025	Yes	High

4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt11-MNES Report_Appendix G.pdf Yathroo Wind Farm Preliminary Construction Environmental Management Plan	07/07/2025	No	High
#2.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High
#3.	Document	Att1-Pt8-MNES Report_Appendix D.pdf Yathroo Wind Farm Preliminary Bird and Bat Adaptive Management Plan	09/12/2025	Yes	High

4.1.5.2 (Migratory Species) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

4.1.5.6 (Migratory Species) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-P13-MNES Report_Appendix I.pdf Yathroo Wind Farm Significant Impact Assessment	09/12/2025	No	High

#2.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

4.1.5.9 (Migratory Species) Why you do not think your proposed action is a controlled action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-P13-MNES Report_Appendix I.pdf Yathroo Wind Farm Significant Impact Assessment	09/12/2025	No	High
#2.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

4.3.8 Why alternatives for your proposed action were not possible

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1-Pt1-MNES Report_Body.pdf Yathroo Wind Farm Assessment of Impacts to Matters of National Environmental Significance	11/12/2025	Yes	High

5.2 Declarations

Completed Referring party's declaration

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

ABN/ACN	57160905706
Organisation name	NEOEN AUSTRALIA PTY. LTD.
Organisation address	2000 NSW
Representative's name	Arkar Arkar
Representative's job title	State Leader WA
Phone	0416987586
Email	arkar@neoen.com
Address	Level 12, Parmelia House, 191 St Georges Terrace, Perth WA, 6000

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

☑ Check this box to confirm these are the correct identification details. *

☑ By checking this box, I, **Arkar Arkar of NEOEN AUSTRALIA 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

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.

Same as Referring party information.

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

☑ Check this box to confirm these are the correct identification details. *

☑ I, **Arkar Arkar of NEOEN AUSTRALIA 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, **Arkar Arkar of NEOEN AUSTRALIA PTY. LTD.**, the Person proposing the action, consent to the designation of **Arkar Arkar of NEOEN AUSTRALIA PTY. LTD.** as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

✔ 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. *

☑ Check this box to confirm these are the correct identification details. *

☑ I, **Arkar Arkar of NEOEN AUSTRALIA 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.