Cape Hardy Green Hydrogen Project: Meteorological Masts

Cape Hardy (Project Co) Pty Ltd

Environmental Impact Report

FINAL

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Abbreviations and Glossary

Abbreviation / Term	Definition
ABS	Australian Bureau of Statistics
ALARP	As low as reasonably practicable
Revera	Revera Energy
BDAC	Barngarla Determination Aboriginal Corporation
Bgl	Below ground level
BoM	Bureau of Meteorology
CP	Conservation Park
DCTB	District Council of Tumby Bay
DEM	Department for Energy and Mining
DEW	Department for Environment and Water
EIR	Environmental Impact Report
EPA	South Australian Environment Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
HRE Act	*Hydrogen and Renewable Energy Act 2023* (SA)
HRE Regulations	*Hydrogen and Renewable Energy Regulations 2024* (SA)
IBRA	Interim Biogeographic Regionalisation for Australia
ILUA	Indigenous Land Use Agreement
LMA	Land Management Agreement
met masts	Meteorological monitoring masts
Minister	Minister for Energy and Mining
NNTT	National Native Title Tribunal
NPW Act	*National Parks and Wildlife Act 1972* (SA)
OMP	Operational Management Plan
PWA	Prescribed Wells Area
REFP	Renewable Energy Feasibility Permit
SAPOL	South Australian Police
SEAMS	Stakeholder Engagement and Approvals Management System
SEO	Statement of Environmental Objectives
VHA	Vegetation Heritage Agreement
WoNS	Weeds of National Significance
WTG	Wind turbines

Definitions

Term	Definition
The Cape Hardy GHP	The Cape Hardy Green Hydrogen Project (Cape Hardy GHP) – comprises infrastructure for renewable energy generation (wind farms, solar arrays, transmission lines), hydrogen production (1 GW electrolyser) and for the storage and export of hydrogen and ammonia from Cape Hardy.
Cape Hardy Precinct	The Cape Hardy Precinct (Figure 1-1) is an indicative target area for the placement of renewable energy infrastructure for the Cape Hardy GHP. This area is indicative only and is subject to change. The eastern-most portions of the Precinct are likely to contain the Cape Hardy electrolyser plant. The Cape Hardy Precinct is proposed to supply approximately 500 – 800 MW of the expected required 1.4 – 1.7 GW of wind to power the Cape Hardy GHP. All Solar arrays are expected to be located within this area.
Moody Ungarra Precinct	Moody Ungarra Precinct (Figure 1-1) is an indicative target area for the placement of renewable energy infrastructure for the Cape Hardy GHP. This area is indicative only and is subject to change. The Moody Ungarra Precinct is proposed to supply approximately 900 MW – 1.2 GW of the expected required 1.4 – 1.7 GW of wind to power the Cape Hardy GHP.
Permit Area	Approximately 6,298 ha of land comprising 38 land parcels, located within the Cape Hardy and Moody Ungarra Precincts, to which the REFP application applies.
The Proposed Activities	The construction, installation, operation and decommissioning of meteorological masts within the Permit Area. These are defined as feasibility activities for the purposes of an REFP under section 8(9) of the HRE Act.

Summary

Background

Revera Energy (Revera) is proposing the Cape Hardy Green Hydrogen Project (Cape Hardy GHP) on South Australia's Eyre Peninsula. This will include wind farms, solar arrays, transmission lines, a 1 GW hydrogen electrolyser, ammonia plant and facilities for hydrogen and ammonia storage export facility, with the potential to increase in scale.

The Cape Hardy GHP involves constructing a 1 GW electrolyser and associated solar and wind infrastructure across two designated areas—the Moody Ungarra Precinct and the Cape Hardy Precinct—within the District Council of Tumby Bay and lands traditionally owned by the Barngarla People. Feasibility studies, including the installation of up to three meteorological monitoring masts to gather wind and weather data, are essential to support the proposed works. In compliance with the *Hydrogen and Renewable Energy Act 2023*, Revera Energy must obtain a Renewable Energy Feasibility Permit (REFP) to conduct these feasibility studies, for which an approved Statement of Environmental Objectives (SEO) and Environmental Impact Report (EIR) is required.

Scope

The EIR (this document) outlines the potential environmental impacts and mitigation measures associated with constructing, operating, maintaining and decommissioning of meteorological masts, as part of feasibility investigations for the Cape Hardy GHP. Installation of the meteorological masts are proposed within land designated as the 'Permit Area' which is located within the Moody Ungarra and Cape Hardy Precincts. The Permit Area covers 38 land parcels and 6,298 hectares, as shown in Figure 1-1. The scope excludes non-invasive surveys, remote data collection, and geotechnical testing, which will be managed separately through agreements with landowners. Before commencing activities, site-specific details must be submitted to the Department for Energy and Mining (DEM) for approval to ensure compliance with the SEO.

Land Use and Environment

The Eyre Peninsula is a popular tourist destination known for its beaches, fishing and coastal towns like Port Neill and Tumby Bay. The region includes various mineral and energy exploration tenures, as well as conservation areas such as the Moody Tank and Hincks Conservation Parks, although these land uses do not occur in the Permit Area.

Across the Permit Area, land uses are dominated by broad-acre agriculture, with large sections cleared for the cultivation of wheat, canola, and grazing livestock; areas with higher rainfall also support crops like pulses and oilseeds. Existing infrastructure in the area includes transmission lines, substations and transformer stations. In the Moody Ungarra Precinct, there are connections to major substations at Lipson, Tumby Bay and Cummins. The Lincoln Highway - the main road connecting Port Lincoln and Whyalla - passes through the Cape Hardy GHP area.

Environmental Impact Assessment

The environmental impact assessment (EIA) for the REFP activities examined various environmental factors, including soil and land quality, surface and groundwater, flora and fauna, air quality, noise and vibration, landscape and visual amenity, heritage sites (both Aboriginal and non-Aboriginal), as well as social environment, public health, and safety.

The assessment found that potential impacts on these elements are generally Negligible, provided that standard control measures are implemented. These measures are essential to manage any potential risks and to ensure activities are conducted with minimal impact on the environment. Impacts to, and controls related to Aboriginal cultural heritage values are subject to Traditional Owner feedback.

Stakeholder Consultation

The stakeholder consultation process has and will continue to engage both directly impacted stakeholders and the broader community to gather feedback, improve awareness and understanding of the REFP EIR and SEO. Key activities include targeted consultations with landowners, Traditional Owners, local councils, and relevant community groups. To enhance outreach, Revera has provided factsheets, engaged local media, and held an informal community information session in early 2025, offering stakeholders multiple opportunities to learn about the project.

Directly impacted landowners, including Traditional Owners, have received detailed information during land access and heritage agreement discussions, as well as access to draft EIR and SEO documents during Revera's consultation period, prior to the Department for Energy and Mining's (DEM) (on behalf of the Minister), own consultation process. Indirectly impacted landowners, local councils, and other regional authorities have and will continue to be engaged through emails, briefings, and community sessions, including updates in Revera's e-newsletter.

A Stakeholder Engagement and Approvals Management System (SEAMS) documents all responses, ensuring all relevant feedback is responded to. Following DEM's (on behalf of the Minister) consultation process, Revera will consider all submissions, revise the EIR and SEO, and provide a consultation summary to DEM detailing responses to stakeholder feedback. This will also be included as an appendix to the next revision of the Environment Impact Report that is subsequently submitted to DEM.

Along with building the social licence for the entire Cape Hardy GHP, Revera has a long-term commitment to community engagement on the Eyre Peninsula supports land access, regulatory approvals and other potential developments in the area.

1 Introduction

1.1 Background

Revera Energy (Revera) is proposing to construct the Cape Hardy Green Hydrogen Project on the Eyre Peninsula in South Australia (the Cape Hardy GHP). The proposed Cape Hardy GHP includes wind farms, solar arrays, and associated transmission line to generate and transmit renewable energy to a 1 GW hydrogen electrolyser, hydrogen and ammonia storage export facility and associated infrastructure. The locality of the Cape Hardy GHP is illustrated in Figure 1-1.

Two areas within the District Council of Tumby Bay (DCTB) that make up the Cape Hardy GHP, referred to as the 'Moody Ungarra Precinct' and the 'Cape Hardy Precinct', are undergoing siting, design and feasibility assessment. To inform the feasibility assessment, Revera is proposing to construct, install and operate (and eventually decommission) up to three meteorological monitoring masts (hereafter referred to as 'met masts') in the Moody Ungarra and Cape Hardy Precincts to collect long term wind and meteorological data.

Constructing, installing, operating, maintaining or decommissioning met masts on non-designated land[1] are defined as feasibility activities and are regulated under the *Hydrogen and Renewable Energy Act 2023* (the HRE Act) and the *Hydrogen and Renewable Energy Regulations 2024* (HRE Regulations). Such activities are approved under a Renewable Energy Feasibility Permit (REFP).

An REFP can only be granted and authorised operations commenced if there is an approved Statement of Environmental Objectives (SEO) in force. This Environmental Impact Report (EIR) and the accompanying SEO have been prepared by Revera to assist with the assessment and approval process for the Proposed Activities to be undertaken under the REFP.

1.2 Revera Energy Company Profile

Revera Energy (previously Amp Energy) is a privately owned global renewable energy company that specialises in developing, constructing, and operating renewable energy projects. Revera (via acquisition of Amp Australia portfolio) established its Australian operating company in 2017 and has three BESS solar hybrid development assets in South Australia, with a combined generation capacity of 1 - 1.5 GW. With offices in Sydney, Melbourne and Adelaide, Revera is committed to its continued growth within Australia, and South Australia, a leading region of renewable energy.

1.3 About this Document

This document has been prepared to satisfy the requirements of an EIR under the HRE Act. It has been prepared in accordance with current legislative requirements, in particular Section 61 of the HRE Act and Regulation 32 of the HRE Regulations.

Table 1-1 gives a brief outline of the content and structure of this EIR.

[1] Under Section 4(1) of the HRE Act, non-designated land is land that is not pastoral land, Crown land (or an area of Crown land of a kind prescribed by the regulations) or South Australian waters.

Table 1-1: Environmental impact report outline

Section	Title	Content
1	Introduction	Introduces the purpose and format of this document Provides background, resource and operations information
2	Legislative Framework	Provides a brief description of the relevant legislation and the assessment and approval process
3	Project Description	Describes the proposed activities in detail
4	Overview of Existing Environment	Describes the existing physical, biological and social environment of the proposed Moody Ungarra and Cape Hardy Precincts.
5	Environmental Impact Assessment	Outlines the environmental assessment methodology and presents the results of the environmental impact assessment
6	Environmental Management Framework	Outlines Revera's management system and relevant management strategies
7	Stakeholder Consultation	Documents Revera's consultation approach and activities undertaken for development of the EIR and SEO
8	References	Lists reference material used in the preparation of this document
Appendix A	Summary of issues raised (Revera consultation)	Provides details on stakeholder feedback to consultation on the EIR and SEO under HRE Regulation 33 and Revera's responses
Appendix B	Summary of issues raised (DEM Consultation)	Provides details on stakeholder feedback to consultation undertaken on the EIR and SEO under HRE Act Section 72 and 73 and Revera's responses

1.4 Scope

This EIR and accompanying SEO cover feasibility activities in the geographical area shown in Figure 1-1 and as described in Section 3 (the Proposed Activities).

Feasibility activities (in the context of a REFP) are defined in Section 8 of the HRE Act as 'constructing, installing, operating, maintaining or decommissioning infrastructure necessary for assessing the feasibility of generating renewable energy from a renewable energy resource'.

Consequently, this EIR and the accompanying SEO cover construction, installation, operation, maintenance and decommissioning of met masts.

Other surveys and data collection activities are not within the scope of this definition and will be addressed through agreements with the relevant landowner. Accordingly, the following activities are not required to be covered by this EIR:

- collection of data using portable remote sensing devices
- non-intrusive surveys (e.g. ecological surveys to ground-truth desktop assessment)
- geotechnical tests including intrusive ground assessment and soil coring.

The scope of the Proposed Activities covered by this EIR is limited to locations within the Permit Area described in Section 3.1.1, that meet the criteria for siting detailed in Section 3.1.1 in relation to residences, surface water features, public roads, transmission lines and native vegetation.

A corresponding SEO has been developed to set out the environmental objectives with which the regulated activities must conform, the criteria upon which the achievement of these objectives will be assessed, and to define immediately reportable and reportable incidents. The SEO has been developed based on the matters contained in this EIR.

This EIR has been written to cover activities spanning a relatively broad geographical area. As discussed in Section 2.1.4, prior to the commencement of any activities, additional site-specific and technical detail for activities will be provided to the Department for Energy and Mining (DEM) under an operational management plan, including a demonstration that the activities are covered by (and are compliant with) an applicable SEO.

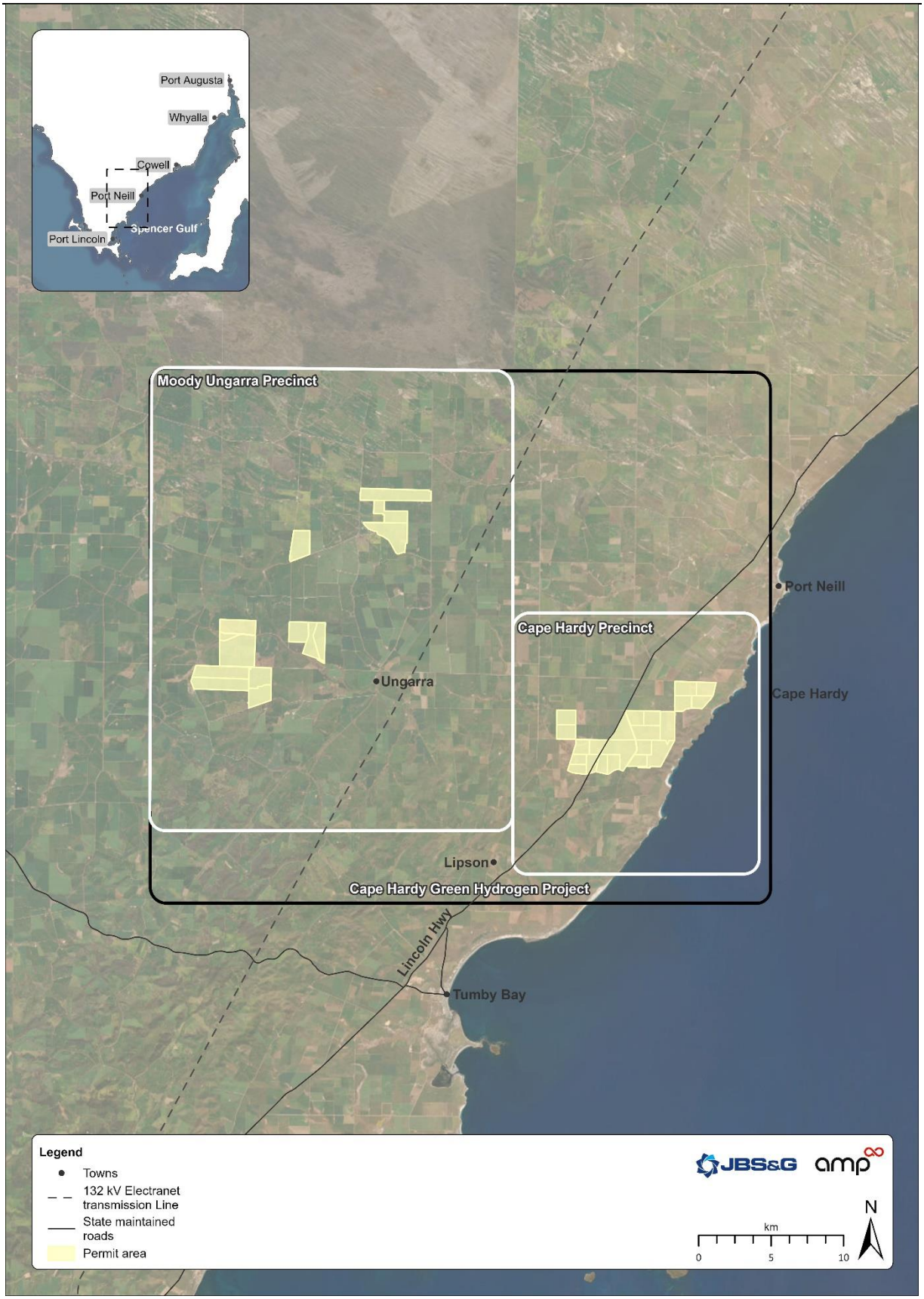

Figure 1-1: Indicative areas for the Cape Hardy Green Hydrogen Project, Cape Hardy Precinct, Moody Ungarra Precinct and Permit Area

2 Legislative Framework

2.1 Hydrogen and Renewable Energy Act

The HRE Act regulates the generation of hydrogen and renewable energy in South Australia. It defines regulated activities and establishes a framework for regulation of these activities. The HRE Act and accompanying HRE Regulations are administered by DEM.

Part 2 of the HRE Act addresses preliminary investigation of renewable energy resources. Section 8 provides for REFPs which authorise the permit holder to undertake the activities specified in the permit[2] (and within the permit area) to assess the feasibility of generating renewable energy from a renewable energy resource.

2.1.1 Statement of Environmental Objectives

Part 4 Division 4 of the HRE Act addresses the potential environmental impact of authorised operations. For the purposes of Division 4, 'authorised operations' includes activities undertaken under an REFP, the definition of 'licence' includes an REFP issued under the Act, and 'licensee' refers to an applicant or holder of an REFP.

Under section 62 of the HRE Act, a licence must not be granted unless an approved SEO in respect of the proposed operations is in force, and a licensee must not undertake authorised operations under a licence unless an approved SEO is in force.

Section 62 states that an SEO must address matters contained in the EIR. The SEO must set out environmental objectives, assessment and leading performance criteria, and immediately reportable and reportable incidents.

2.1.2 Environmental Impact Report

Section 61 of the HRE Act requires that an EIR addressing proposed authorised operations must be prepared for the purpose of the approval of an SEO under Section 62. The EIR must assess the environmental impact of authorised operations against environmental impact assessment criteria that are determined by the Minister for Energy and Mining (Minister). These criteria are discussed in Section 5 of this EIR.

Under Section 61(2) of the HRE Act, an EIR must:

- take into account the environment, cultural and other values as those matters are relevant to the assessment
- take into account risks inherent in the authorised operations to the health and safety of the public
- contain sufficient information to make possible an informed assessment of the likely impact of the authorised operations on the environment
    - include an assessment of the environmental impact of authorised operations to which the report applies against the environmental impact assessment criteria
- be prepared in accordance with the requirements of the regulations.

[2] Note that a Renewable Energy Feasibility Permit only applies to land not considered 'designated land' within the meaning of the HRE Act. Non-designated land generally means freehold land.

HRE Regulation 32 requires that the EIR contains the following:

- a description of the authorised operations to be undertaken and the location at which the operations are to be undertaken
- a description of the specific elements of the environment that can reasonably be expected to be affected by authorised operations, with particular reference to the environment and existing land uses
- data relating to biodiversity within the area of land to which the report relates that can reasonably be expected to be affected by authorised operations
- an assessment of the cultural and heritage values of Aboriginal and Torres Strait Islander persons and other persons within the area of land to which the report relates that can reasonably be expected to be affected by authorised operations, and the public health and safety risks inherent in undertaking those operations (insofar as these matters are relevant in the particular circumstances)
- if relevant and required by the Minister—an assessment of the continuity of supply with respect to hydrogen
- information on consultation that has occurred in accordance with the approved consultation plan, including specific details about relevant issues that have been raised and any response to those issues (but not including confidential information).

Section 4(3) of the HRE Act defines the environment as including:

- land, air, water (including both surface and underground water and sea water), organisms, ecosystems, flora, fauna and other features or elements of the natural environment
- buildings, structures and other forms of infrastructure, and cultural artefacts
- existing or permissible land use
- public health, safety or amenity
- the heritage, aesthetic, Aboriginal, social and cultural values of an area
- the social or economic effects associated with regulated activities.

This document fulfils the requirements of an EIR for authorised operations under an REFP and has been prepared in accordance with Section 61 of the HRE Act and Regulation 32 of the HRE Regulations.

2.1.3 Approval of the SEO

Consultation by the licensee

The licensee is required to undertake consultation on the EIR and SEO prior to submission of an application to the Minister for approval of the SEO.

Under Regulation 33 of the HRE Regulations, the licensee must prepare a plan for consultation on a proposed EIR and SEO for the approval of the Minister. The plan must address the criteria set out in Regulation 33(2) and include a list of affected landowners, Recognised Aboriginal Representative Bodies or Traditional Owners, Crown agencies and instrumentalities, and councils as identified by the licensee.

The consultation plan must be submitted to the Minister for approval at least 10 days before consultation is due to commence. Following consultation, a report must be provided to the Minister

by the licensee on the results of consultation setting out persons consulted, issues of concern raised, and steps taken or proposed to address those concerns in the EIR and SEO.

Consultation by the Minister

Following targeted consultation on the EIR and SEO, the licensee submits an application for approval of the SEO to the Minister under section 63 of the HRE Act. The EIR and SEO are reviewed against the relevant provisions of the HRE Act and Regulations, and the environmental impact assessment criteria. If satisfied, the Minister will then undertake additional public consultation on the EIR and SEO under sections 72 and 73 of the HRE Act for a period of not less than 30 business days. Regulation 39 prescribes the requirements for public consultation including invitations for written submissions. The Minister must also refer the EIR and SEO to the prescribed bodies identified in Section 73 and Regulation 40.

Following public consultation, the licensee will be provided with copies of submissions from the public and prescribed bodies, and where required, will provide written responses on any matters raised during public consultation and update the EIR and SEO accordingly.

Approval by the Minister

Once the SEO is assessed as complying with the requirements of Division 4 of the HRE Act, it will be approved by the Minister. At the conclusion of the approval process, all documentation, including this EIR and its associated SEO, must be entered on an environmental register. This public Environmental Register is accessible to the community from the DEM website.

2.1.4 Operational Management Plan

Following approval of the SEO and the granting of the REFP (but prior to commencing authorised operations) a licensee must submit an Operational Management Plan (OMP) for approval by the Minister. Under Section 66 of the HRE Act, an OMP must:

- specify the authorised operations proposed to be undertaken
- specify the statement of environmental objectives to which the OMP applies
- specify how proposed authorised operations will be managed, including details of the management systems and controls that will ensure compliance with the relevant SEO
- contain any other information and comply with any other requirements as prescribed by the regulations.

The OMP provides an additional opportunity for the Minister to ensure that the Proposed Activities and their impacts can be effectively managed and are consistent with the approvals obtained during the EIR and SEO approval process. This is particularly relevant for activities that are conducted under an SEO that apply to a broad geographical area, as it provides site-specific detail that is not usually contained in the generic documents.

2.2 Other Legislation

A variety of legislation applies to hydrogen and renewable energy activities. Legislation that is particularly relevant to Revera's proposed REFP activities is listed below, noting that this is not a comprehensive list of all applicable legislation.

Commonwealth

- *Aboriginal and Torrens Strait Islander Heritage Protection Act 1984*
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)

South Australia

- *Aboriginal Heritage Act 1988*
- *Civil Aviation Act 1988*
- *Dangerous Substances Act 1979*
- *Environment Protection Act 1993*
- *Fire and Emergency Services Act 2005*
- *Heritage Places Act 1993*
- *Landscape South Australia Act 2019*
- *National Parks and Wildlife Act 1972*
- *Native Vegetation Act 1991*
- *Radiation Protection and Control Act 2021*
- *South Australian Public Health Act 2011* and Public Health (Wastewater) Regulations 2013
- *Work Health and Safety Act 2012*.

3 Project Description

The Proposed Activities consist of the construction and operation (and eventual decommissioning) of met masts in the Moody Ungarra Precinct and Cape Hardy Precinct. The Proposed Activities comprise one of a suite of feasibility studies being undertaken by Revera to inform the Cape Hardy GHP.

3.1 Feasibility Studies and Activities

3.1.1 Selection of locations for the permit area

The Moody Ungarra Precinct and Cape Hardy Precinct are considered ideal to locate the renewable infrastructure for the Cape Hardy GHP. However, further information is required to confirm this expectation, and to refine the planned siting of the wind turbine generators (WTGs), solar arrays, transmission lines and other ancillary infrastructure. Specific to the Proposed Activities and to determine the size, design and total number of wind turbines required, in-field, long-term assessment of wind and meteorological conditions must be conducted.

The location of the precincts for potential renewable energy infrastructure has been selected for further feasibility studies based on a range of factors, including:

- technical feasibility with respect to construction and operations
- location in close proximity to existing electricity infrastructure and the proposed hydrogen plant at Cape Hardy
- level of land disturbance from past and current agricultural activities (i.e. lower likelihood of environmental and heritage impacts)
- site accessibility and site providers
- likelihood of land use conflicts with surrounding land uses
- level of initial support within the community.

The following criteria will be used for siting of the met masts:

- 1 km minimum separation distance to the nearest residence
- 100 m minimum separation distance from surface water features
- 100 m minimum separation distance from public roads
- 25 m minimum separation distance from existing transmission lines
- 500 m minimum separation distance from any conservation zoned land (in particular, from Moody Tanks Conservation Park, a public protected area)
- 50 m minimum separation distance from any area covered by a Native Vegetation Heritage Agreement
- avoidance of areas of intact or significant native vegetation and cultural heritage sites (whether known or unknown).

The met masts will be constructed within cleared paddocks thereby avoiding any native vegetation clearance. Prior to undertaking any clearance works, sites will be inspected to verify the absence of any vegetation requiring native vegetation clearance permit/s.

Consideration of these factors in a preliminary desktop assessment identified a number of land parcels suitable for the Proposed Activities, which comprise the defined Permit Area. This Permit Area covers both the Moody Ungarra and Cape Hardy Precincts, which are described below.

Moody Ungarra Precinct is located in an agricultural area of the DCTB and approximately 30 km from the proposed Cape Hardy hydrogen electrolyser plant. The proposed Permit Area covers approximately 3,439 ha.

The proposed Permit Area within the Moody Ungarra Precinct is made up of 15 land parcels and comprises agricultural land which is generally highly modified due to cropping and grazing activities and large-scale clearance of native vegetation. Areas of remnant vegetation are generally small and isolated and mainly restricted to roadsides, drainage lines and rocky, undulating, and sandy areas (NatureMaps 2024).

Cape Hardy Precinct is located in an agricultural area of the DCTB directly adjacent to and incorporates the proposed site for the Cape Hardy hydrogen electrolyser plant. The proposed Permit Area covers approximately 2,859 ha. The nearest township is Port Neill, approximately 3 km north.

The proposed Permit Area within the Cape Hardy Precinct is made up of 23 land parcels. Like the Moody Ungarra area, the Cape Hardy Precinct has been substantially cleared and subject to long-term and ongoing cropping and grazing activity. Remnant vegetation is mainly limited to roadsides, drainage lines and small, isolated patches in rocky or undulating areas (NatureMaps 2024).

Further details of the existing environment in each of the Precincts are provided in Section 4.

3.2 Renewable Energy Feasibility Permit Work Program

The Proposed Activities are described below.

3.2.1 Meteorological mast installation

Met masts are used to obtain wind field data at potential wind farm sites to help determine the wind profile of the region. The data collected is used in wind modelling programs to determine the placement, spacing and design of wind generation technology that will ensure optimal energy generation. It is expected up to three met masts will be utilised for this purpose across the Permit Area. The met masts will therefore be constructed within the Permit Area and sited strategically in locations where land access has been granted and where the topography and wind resource are considered representative of the area (refer Figure 1-1).

The proposed met masts are temporary fixed towers (up to 160 m in height) that accommodate monitoring equipment including anemometers, wind vanes and temperature, humidity and pressure sensors. The equipment is affixed at different heights to collect wind speed and direction data over an extended and continuous period, ensuring that seasonal and daily variations are captured. Met masts also have built-in power and communications capabilities to record and transmit data from data loggers for further analysis. Sensors and data loggers are powered by a small solar panel mounted on the met mast and the mast is protected by a lightning rod (refer Figure 3-1). The met mast base and each footing will be fenced to protect them from livestock, and other measures incorporated to restrict third-party access to the met mast structure (refer Plate 3-1 and Plate 3-2).

Each met mast consists of a supporting structure (either a pole or a lattice tower), anchored by guy wires (cables) and can be difficult to see from the air due to their slender construction and guy wires. The National Airports Safeguarding Framework Guideline D (DITRDCA 2012) sets out measures for to avoid problems for low-flying aircraft (including aerial agricultural operations) which may include:

- painting the top third of the mast in alternating contrasting bands of colour
- marker balls , high visibility flags or other surface finish to increase the visibility of the mast
- marker balls or high visibility flags / sleeves placed on outside guy wires (minimum upper third, as recommended by CASA)

- ensuring guy wire ground attachment points have contrasting colours to the surrounding ground/ vegetation
- low intensity steady hazard/warning obstacle light (as recommended by CASA)

Plate 3-1: Meteorological mast example
[Source: Vestas]

Plate 3-2: Meteorological mast base
[Source: Precinct Urban Planning]

Met masts have a small footprint at their base with a larger guy wire span that is proportional to the met mast height. While subject to final design, the met masts are proposed to be located to avoid clearing of native vegetation or crossing of watercourses during construction, operation, maintenance or removal. They will also avoid any identified sites of potential cultural heritage significance.

Concrete footings are installed at the met mast base and at each contact point from the guy wire to the ground. The construction of these met masts is expected to consist of excavating the met mast base and guy foundations and installing prefabricated concrete bases into the foundation up to approximately 0.5 m from the ground surface. Alternatively, poured concrete foundations may be installed and cured prior to met mast erection. Excavations will be backfilled with stockpiled soil and levelled. Once commissioned, occasional visits for maintenance and troubleshooting may be required.

A met mast is typically installed early in the feasibility assessment stage. Temporary met masts may be in place until wind farm construction activities commence in order to capture daily, seasonal and year to year data, before being removed and potentially replaced by a permanent met mast in an alternate location. A period of correlation overlap (e.g. 6 months) between the temporary and permanent masts therefore may be needed before temporary mast removal. Alternatively, met masts may remain in place permanently and continue to monitor wind data throughout operation of the wind farm. This permit does not cover the use of a met mast for activities post-feasibility, and the approval to construct and/or use any permanent met mast will be subject to a separate approval submission.

All information collected is safely stored in data loggers. Power and communications are also included in the met mast to ensure this field data is recorded and transmitted from these loggers for analysis. The analysis process consists of screening the multiple data sets from the met masts and together with any LiDAR and/or SoDAR[3] measurements that have been collected to remove any obvious erroneous data. Then the screened data will then be input into a wind modelling program and analysed. The output of this work will inform the placement, spacing and wind generation technology that will ensure the optimal energy generation will occur. This information will be summarised in a report to Revera's energy's engineers, who will take this information, together with any ecological or geotechnical constraints also determined during the feasibility studies from desktop and field works, to determine how best to implement the recommendations from the report.

[3] SoDAR (Sound Detection And Ranging) and LiDAR (Light Detection And Ranging) devices may also be used in conjunction with met mast data to assist validation, verification and modelling of energy yield predictions. These are temporary devices housed in a trailer, do not require fixtures or installation and operate without external power requirements and their use is not within the scope of this permit.

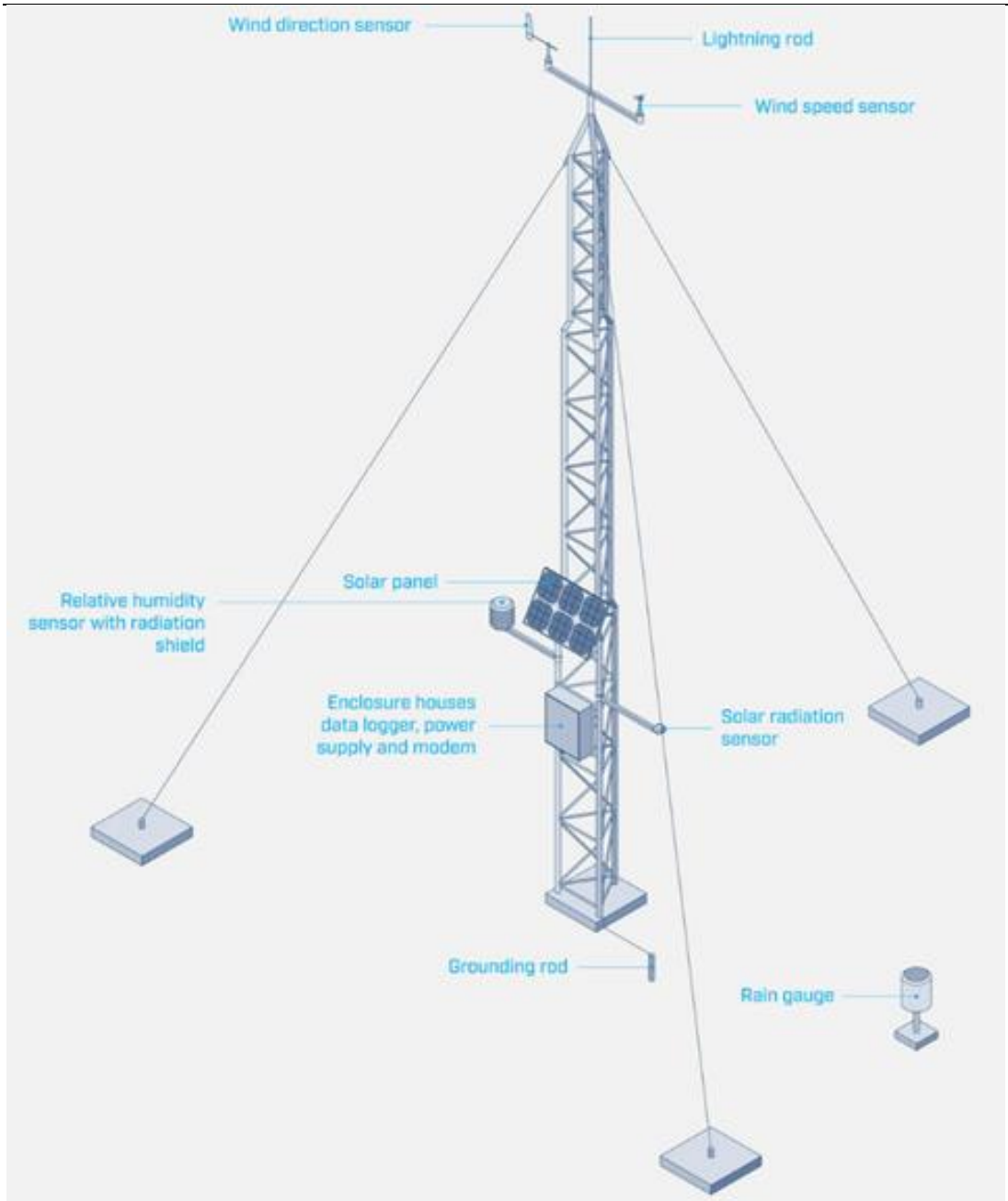

Figure 3-1: Typical meteorological mast components
[Source: Credit Radiowave Data Loggers]

3.2.2 Access for met mast installation and maintenance

Prior to construction, an assessment will be undertaken of the proposed areas where each met mast will be located to determine accessibility requirements for construction equipment, vehicles (nominally 4WD vehicles, trailers and a 6-tonne truck, but this is subject to final requirements) and a suitable laydown area. These details will also assist with the determination of the final met mast design, which is specific to the possible locations.

Access tracks would need to be of a standard that allows access by four-wheel drives, small trucks and potentially concrete trucks and cranes for the construction of the met masts. Wherever possible, existing roads and tracks will be used to provide access to the area being investigated, although in some cases it may be necessary to upgrade existing tracks. Appropriate access tracks will be selected in consultation with landowners and sited to minimise impacts to native vegetation, and disruption to

overall property access and management. Any deterioration of property tracks or infrastructure as a result of feasibility activity-related traffic would be rectified.

Access tracks used for feasibility activities would be rehabilitated when they are no longer required by Revera, subject to landowner agreement.

3.2.3 Workforce accommodation

No camps will be required during the construction or operation periods. Existing accommodation facilities will be used for the construction workforce, e.g. within the Tumby Bay or Port Neill townships.

3.2.4 Timing of Proposed Activities

A detailed schedule of activities is currently in development, as there are dependencies such as equipment availability / lead times, budget and consultant availability at the time of preparing this document.

In general terms, commencing at the start of the period of the REFP approval (nominally May 2025), and with all required land access and other approvals in place, construction and commissioning would commence in 2025, and operation and maintenance would continue for the entire term of the permit.

3.2.5 Decommissioning and Rehabilitation

Decommissioning of the met masts at the completion of the feasibility activities (unless they are retained to continue to monitor wind data throughout operation of the wind farm, as described in Section 3.2.1) will comprise the following activities (Plate 3-3):

- Electrical disconnection of the power supply and solar panels
- Safe removal of the lattice tower
- Approved disposal of the monopile and electrical components
- Foundation removal and ground reinstatement
- Components of the met mast will be recycled where possible and managed in line with the SA EPA's waste management hierarchy.

Plate 3-3: Decommissioning
[Source: GC Wind Services]

4 Overview of Existing Environment

The Cape Hardy GHP is proposed to be constructed on the Eyre Peninsula over a broad area near Port Neill (Figure 1-1). The area will allow for the capacity required to generate and transmit renewable energy to the hydrogen and ammonia storage and export facility. The Moody Ungarra and Cape Hardy Precincts shown in Figure 1-1 will be the indicative locations for the wind farms, solar arrays, and associated transmission lines.

The Proposed Activities will be constructed within a specific Permit Area which comprises of land across these two Precincts where Revera has obtained land access agreements, has support from the landowners to construct the met masts on their property and is considered to be a suitable location to collect data for the resource feasibility modelling.

4.1 Climate

The climate across the Cape Hardy GHP is temperate with warm summers and cool winters. Average temperatures range between 5.2 °C and 15.7 °C in winter and 15.1 °C to 30.1 °C in summer. Average annual rainfall is 426.4 mm, with highest daily rainfall of 51.0 mm recorded in February 2014 and again in January 2017 (BoM, Cummins Aero 2007-2024).

4.2 Bioregion, Landform and Soils

The Cape Hardy GHP is situated within the Eyre Yorke Block bioregion of the Interim Biogeographic Regionalisation for Australia (IBRA), which comprises the two subregions Eyre Mallee and Eyre Hills (Figure 4-1). The majority (approximately 80% of the footprint) of the Cape Hardy GHP, including all of the Cape Hardy Precinct and the majority of the Moody Ungarra Precinct, falls within the Eyre Hills

subregion. This subregion is characterised as a depositional dune field with low limestone dune ridges. The northern portion of the Cape Hardy GHP footprint falls within the Eyre Mallee subregion which is characterised as an erosional dune field with granite hills and metamorphic rocky ridges. Both subregions support mallee vegetation which has been extensively cleared for agriculture and livestock grazing (remnant vegetation limited to 29% predominantly occurring along roadsides).

At a regional scale, IBRA subregions can be further divided into IBRA Associations, which are based on recurring patterns in geology, topography, soil and vegetation (Government of South Australia, 2016). Four IBRA Associations occur within the region and are described in Table 4-1.

Table 4-1: IBRA subregions, land systems and landforms within the region

IBRA Subregion	IBRA Association	Description*
Eyre Mallee	Isabella	An undulating plain with widely spaced parallel dunes. The plains and most of the dunes are used for rotation cereal cultivation and livestock grazing. Small areas of dunes remain under a cover of open mallee scrub on which there is extensive livestock grazing.
Eyre Hills	Butler	An undulating plain on partly calcreted alluvium with isolated quartzite hills, ending in low cliffs along the coastline. Predominantly exotic grassland cover is used for rotation cereal cultivation and livestock grazing on the plain and floodplain, and livestock grazing on the hills.
	Yalunda	Low hills derived from the dissection of a former lateritic plateau. There is a cover of grassland and open parkland used for winter cereal cultivation and grazing livestock, with isolated remnants of native woodland used for extensive livestock grazing.
	Waretta	An undulating plain and low hills on metasediments, with cliffs along the coastline. Predominantly exotic grassland cover is used for rotation cereal cultivation and livestock grazing on the plain and floodplain, and livestock grazing on the hills.

*Source: Derived from Laut et al. (1977).

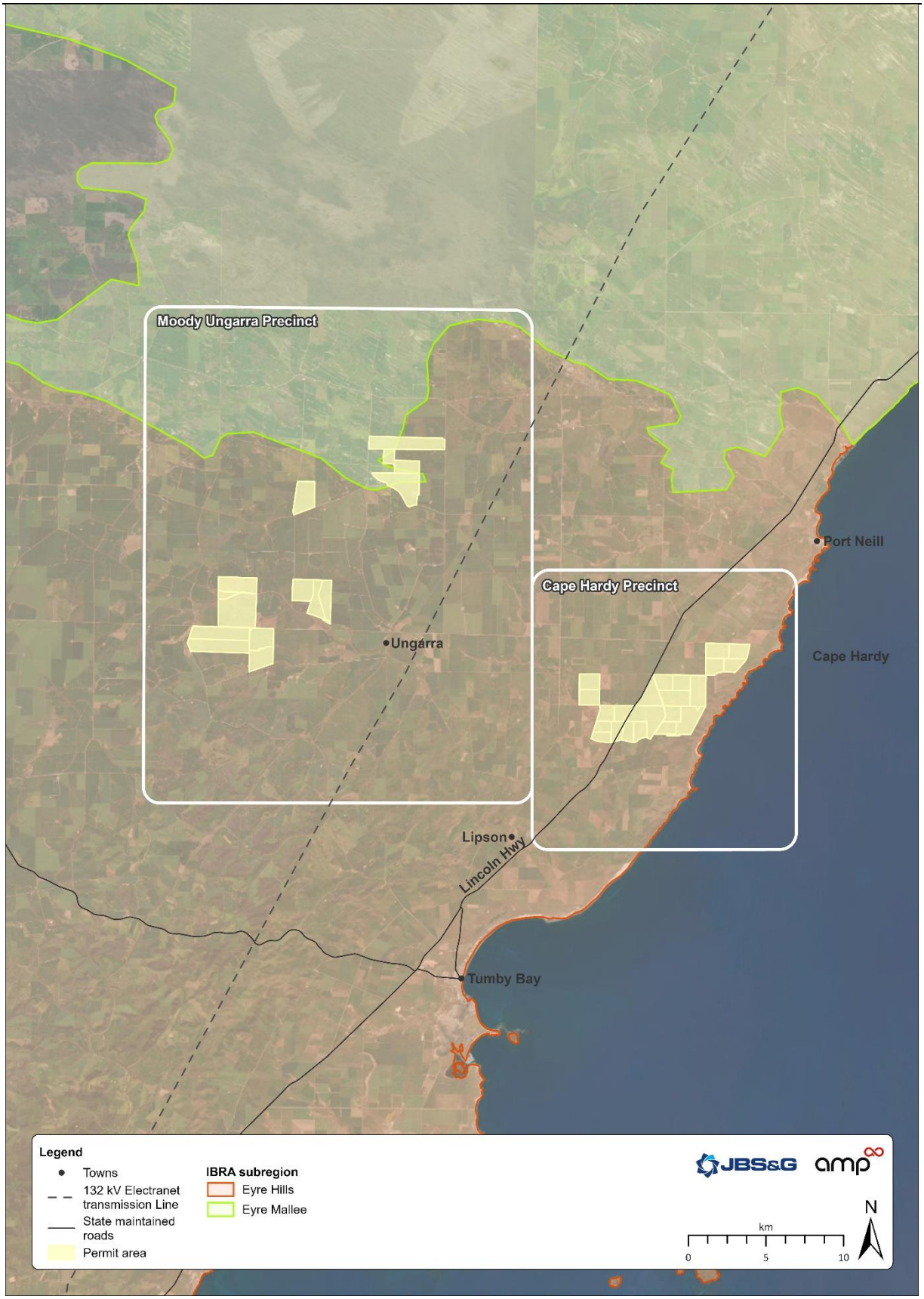

Figure 4-1: IBRA subregions within the Cape Hardy GHP

4.3 Water Resources

4.3.1 Surface water

The Cape Hardy GHP straddles the boundary between the Spencer Gulf and Gairdner surface water basins (Figure 4-2).

The Spencer Gulf Basin is located on the eastern Eyre Peninsula, extending north from Tumby Bay to west of Port Augusta. This basin is characterised by alluvial plains and valleys, with catchment sizes typically smaller in size (less than 100 km^2), longer and narrower catchment shapes and steeper slopes. The southern area of the basin experiences a wetter climate, with land use primarily focused on cropping activity.

The Gairdner Basin is the most extensive of the basins on Eyre Peninsula, extending north from Cummins to north of Coober Pedy and west beyond Ceduna.

Where the Permit Area is within the Spencer Gulf Basin it is mainly within the Salt Creek catchment area comprising approximately 629 km^2 (DEH, 2007). Salt Creek and its tributaries are ephemeral. The eastern portion of the Permit Area at Cape Hardy is within the Cape Hardy catchment area, which is a narrow catchment along the coast. Where the Permit Area extends into the Gairdner Basin there is no designated catchment area.

There are scattered ephemeral saline flats across the locality and numerous dams have been built throughout the area to provide water resources for pastoral purposes (Figure 4-3).

Assessments of water quality in creeks on the Eyre Peninsula were conducted by the South Australian Environment Protection Authority (EPA) in 2010 and 2015. In 2015 40% of sites were assessed as fair, 40% as poor and 20% as very poor condition. This was a decline from the 2010 survey where a larger number of sites were assessed as ‘fair’ and ‘poor’, and fewer as ‘very poor’. All streams were measured as saline. While many streams may be naturally saline, high rates of vegetation clearance for agricultural land uses since European settlement may also have contributed to increased salinity levels. All streams showed signs of nutrient enrichment, characterised by large growth of algae and aquatic plants (EPA, 2015).

Within the Permit Area, there are no significant surface water features, and limited ephemeral drainage lines (Figure 4-3). The geographical extent of the Permit Area allows for the micro siting of met masts to avoid environmental features including ephemeral drainage lines.

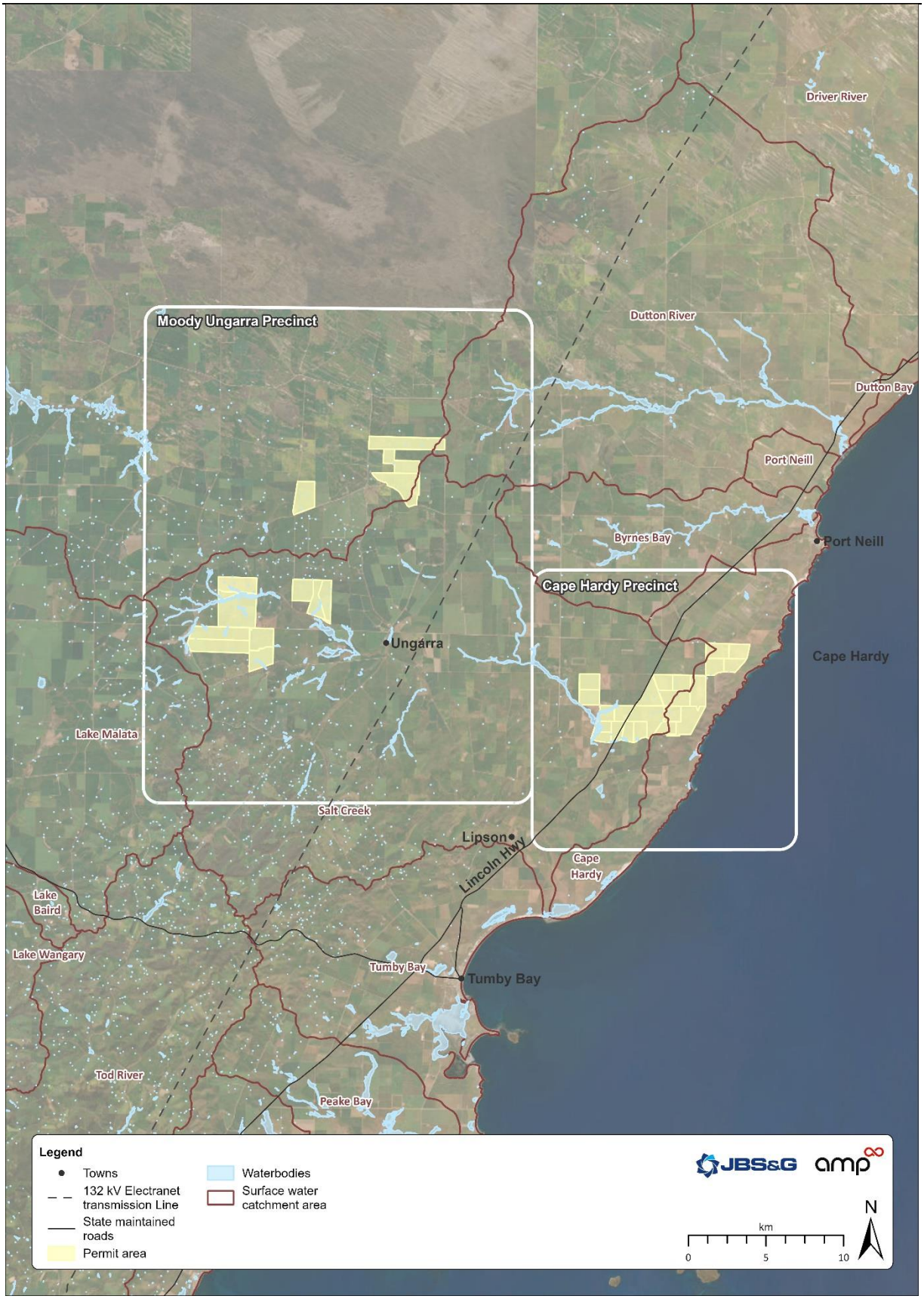

Figure 4-2: Surface water basins within the Cape Hardy GHP

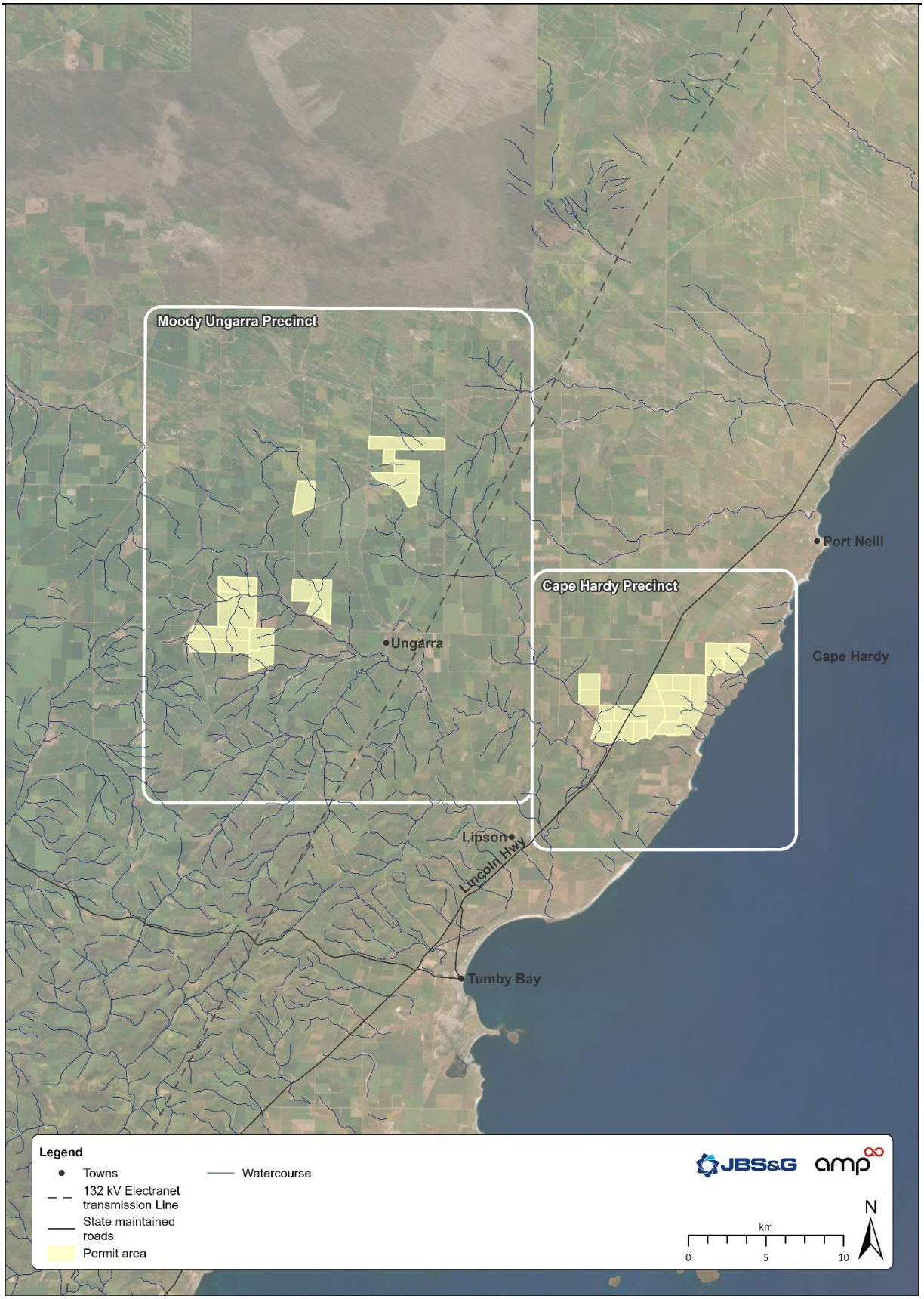

Figure 4-3: Surface water courses within the Cape Hardy GHP

4.3.2 Groundwater

Groundwater resources on the Eyre Peninsula are variable in quality and quantity. The main water resources exist within the Southern Basins and the Musgrave Prescribed Wells Area (PWA) in the west (EP NRM Board, 2015), which are located more than 30 km from the Cape Hardy GHP (Figure 4-4). There are no prescribed water resources or prescribed wells areas identified in vicinity of the Permit Area.

The basement fractured rock aquifer at Cape Hardy, the Donington Suite, is a water bearing fractured rock aquifer, with limited transmissivity, however considered to be able to provide variable low yields (< 0.5 L/s (43 KL/d)) of high salinity water (>50,000 mg/L TDS). The thickness of the Donington Suite in the area is unknown, but it is expected to extend to a depth greater than 30 m bgl.

Groundwater recharge into fractured rock aquifers is generally considered localised, governed by occurrences of basement outcropping and sub-cropping as well as vertical and lateral leakage from adjacent aquifers (Cook, 2003).

There are no groundwater users in the vicinity of the Project Area, however there are three investigation groundwater wells which were drilled to 20 m bgl in 2012 as part of Iron Road's Central Eyre Iron Project investigations (Iron Road, 2015).

Available mapping indicates that the depth to the shallowest aquifer is variable across the locality and is generally deeper than 20 m below the soil surface (SARIG, 2024). Salinity (or total dissolved solids, TDS) is typically 14,000 ppm to 35,000 ppm for the Cape Hardy area south of Port Neill. Across the Moody Ungarra area, TDS is typically 7,000 ppm to 35,000 pm in the north decreasing to 0 ppm to 1,500 ppm in the south.

In general, salinities in the broader region range between 7,000 and 50,000 mg/L at yields less than 1 L/s and is generally used for use for stock water, or domestic water sources. Refer Figure 4-5.

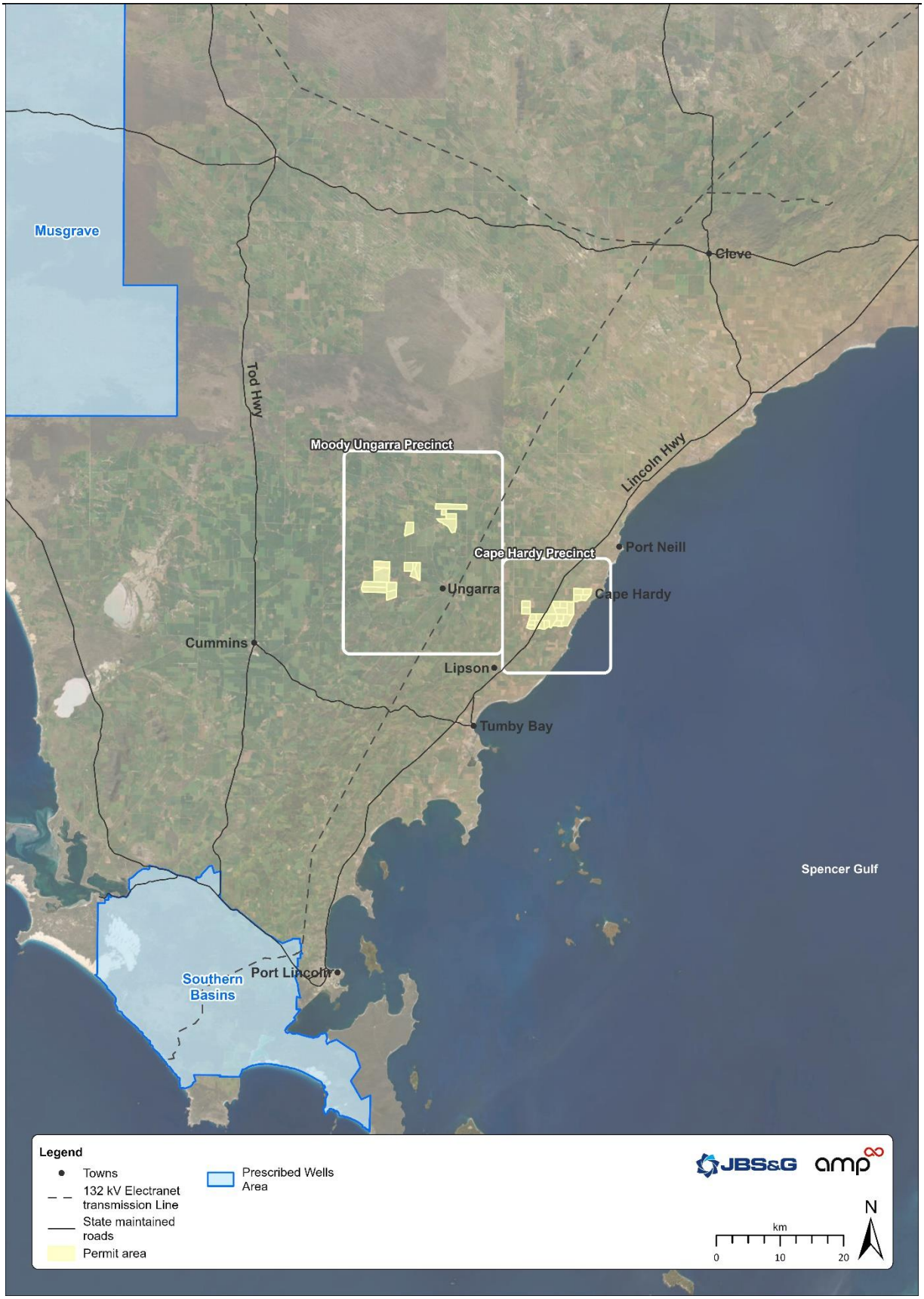

Figure 4-4: Southern Basins and the Musgrave Prescribed Wells Areas

Figure 4-5: Shallow total dissolved salts within the Cape Hardy GHP

4.4 Flora, Fauna and Biodiversity

4.4.1 Native vegetation

Clearance for agriculture and grazing has led to extensive habitat modification, particularly through removal of vegetation and fragmentation of habitat. The proportion of native vegetation remaining across the region varies from 7% in the Butler IBRA Association to 20% in the Yalunda IBRA Association (Native Vegetation Council 2024).

The majority of remnant vegetation occurs along roadsides, drainage lines and steeply sloping areas where agricultural activities would be difficult, as well as vegetation retained within conservation areas in or adjacent to the precincts Figure 4-6). Areas near crops or infrastructure have increased occurrence of weeds compared with sections further distant from these disturbances and larger patches of remnant vegetation are generally of a higher quality.

The Moody Ungarra Precinct is a rocky, undulating sandy area which supports patches of *Eucalyptus* mallee forest/woodland spread across the area, and patches of melaleuca shrubland, *Allocasuarina* forest and woodland, tussock grassland, and samphire shrubland.

Remnant vegetation in the Cape Hardy Precinct comprises patches of *Eucalyptus* mallee forest / woodland, a large area of other grassland, herb land, sedgeland and rush land on the eastern edge of the site, small patches of hummock grassland throughout the south of the site. Small patches of chenopod shrubland, samphire shrub and forbland, tussock grassland, and *Melaleuca* and *Allocasuarina* forest and woodland are scattered through the area.

Vegetation types recorded within the Permit Area are listed in Table 4-2.

Table 4-2: Mapped vegetation types within the Permit Area

Broad Vegetation Description	Vegetation Community
Allocasuarina forest and woodland	*Allocasuarina verticillata* woodland
Eucalyptus mallee forest and mallee woodland	*Eucalyptus calycogona* ssp. (mixed) mallee woodland
	Eucalyptus odorata (mixed) mallee woodland
	Eucalyptus phenax ssp. mallee woodland
	Eucalyptus brachycalyx mallee woodland
	Eucalyptus diversifolia ssp. *diversifolia* (mixed) mallee woodland
	Eucalyptus dumosa (mixed) mallee woodland
	Eucalyptus leptophylla (mixed) mallee woodland
	Eucalyptus peninsularis (mixed) mallee woodland
	Eucalyptus pileata (mixed) mallee woodland
	Eucalyptus incrassata mallee woodland
	Eucalyptus oleosa ssp. mallee woodland
	Eucalyptus socialis (NC) mallee woodland
	Eucalyptus yalatensis (mixed) mallee woodland
	Eucalyptus rugosa mallee woodland
	Eucalyptus porosa (mixed) mallee woodland
	Eucalyptus gracilis (mixed) mallee woodland
Melaleuca forest and woodland	*Melaleuca halmaturorum* forest
Melaleuca shrubland	*Melaleuca lanceolata* shrubland
	Melaleuca uncinata shrubland

Broad Vegetation Description	Vegetation Community
	Melaleuca acuminata ssp. *acuminata*, *Eucalyptus socialis* ssp. shrubland
	Melaleuca halmaturorum shrubland
Callitris forest and woodland	*Callitris gracilis* woodland
Acacia shrubland	*Acacia nyssophylla* shrubland
Samphire shrubland	*Tecticornia pergranulata* ssp. *pergranulata* (mixed) shrubland
Tussock grassland	*Austrostipa* sp. grassland
	Gramineae sp. (mixed) grassland
Rushland/sedgeland	*Lomandra effusa* (mixed) grassland
Hummock grassland	*Triodia scariosa* ssp. (NC) grassland
Coastal shrubland	*Olearia axillaris* (mixed) shrubland

The north-west of the Moody Ungarra Precinct includes three separate native vegetation heritage agreements (VHA) (refer Figure 4-6), each of which are also subject to the State Significant Native Vegetation Overlay. The vegetation in the VHAs is dominated by Coastal White Mallee (*Eucalyptus diversifolia*) woodland (NatureMaps 2024). In all, the three VHAs (HA 887, HA 1518 and HA 937) total approximately 450 hectares. None of these areas will be accessed or otherwise utilised by Revera. There are no VHAs within the Cape Hardy Precinct.

4.4.2 Ecological Communities of National Environmental Significance

Two ecological communities of national environmental significance (listed under the EPBC Act) are predicted as likely to occur in the Cape Hardy GHP area by the EPBC Act Predicted Matters Search Tool (DCCEEW 2024):

- The Critically Endangered Peppermint Box (*Eucalyptus odorata*) Grassy Woodland of South Australia
- The Endangered Eyre Peninsula Blue Gum (*Eucalyptus petiolaris*) Woodland.

The predicted distributions of both of these ecological communities overlap with the southern section of the Moody Ungarra Precinct and Permit Area (Figure 4-8).

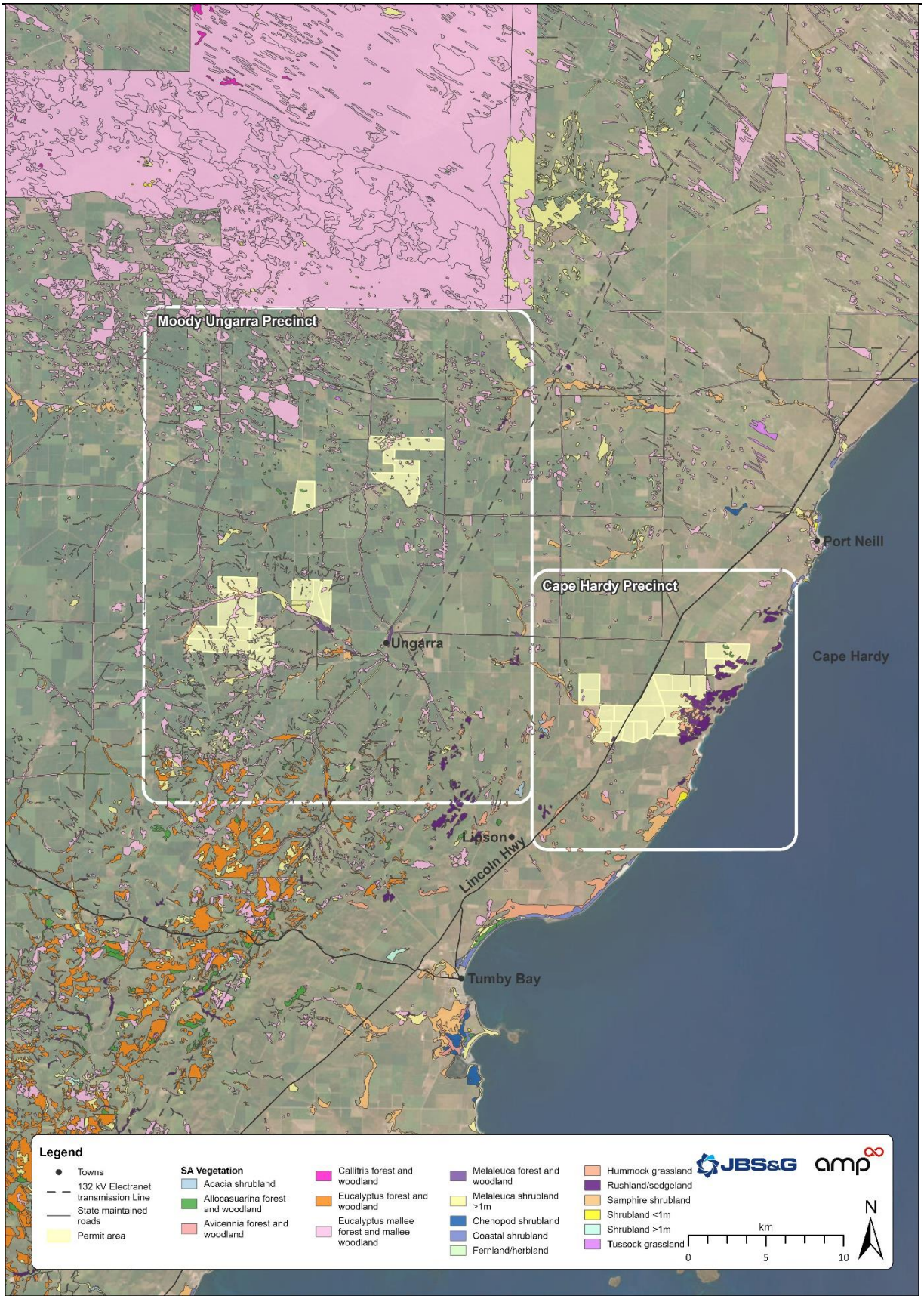

Figure 4-6: Native vegetation cover within the Cape Hardy GHP

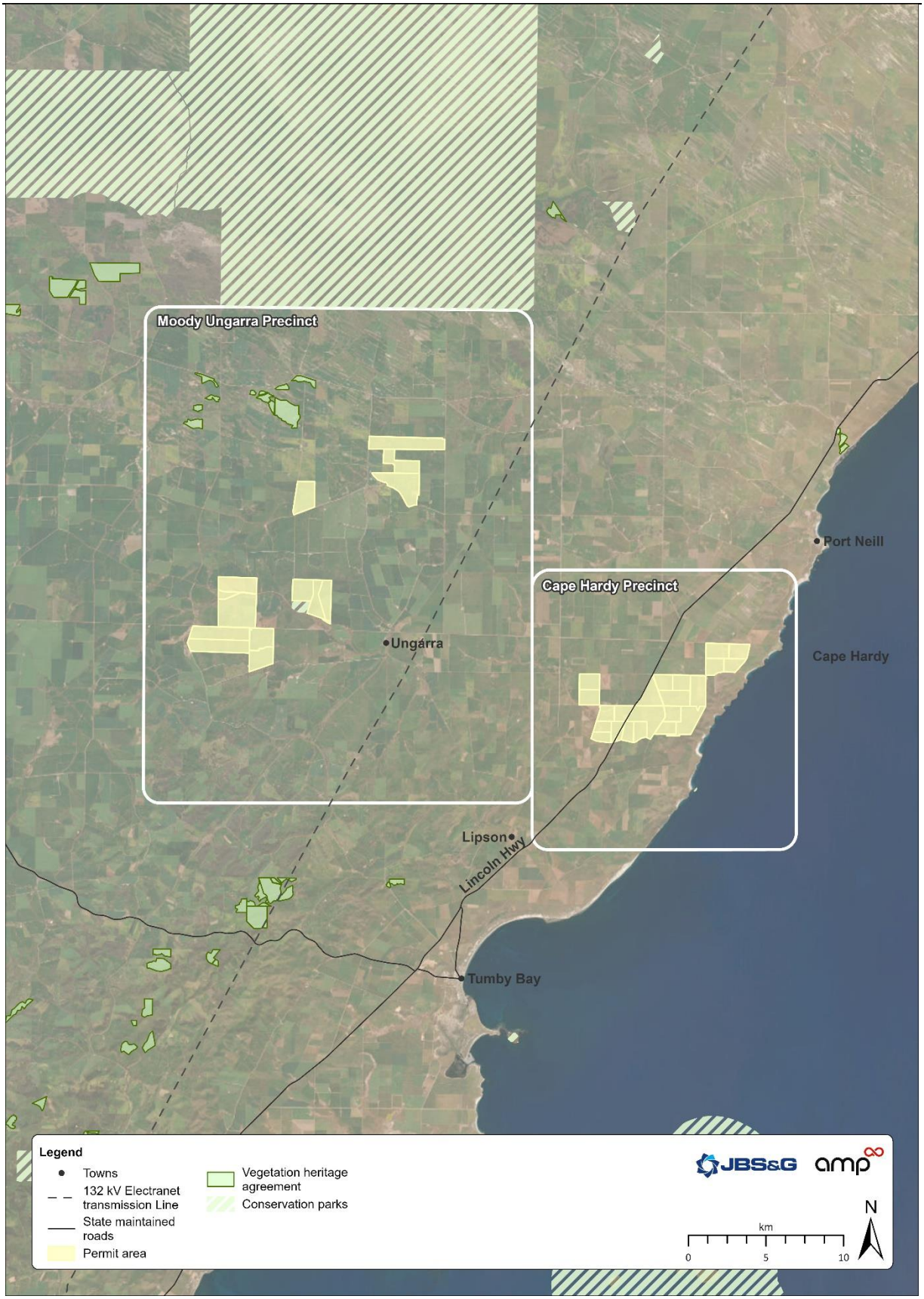

Figure 4-7: Conservation Parks and vegetation heritage agreements within the Cape Hardy GHP

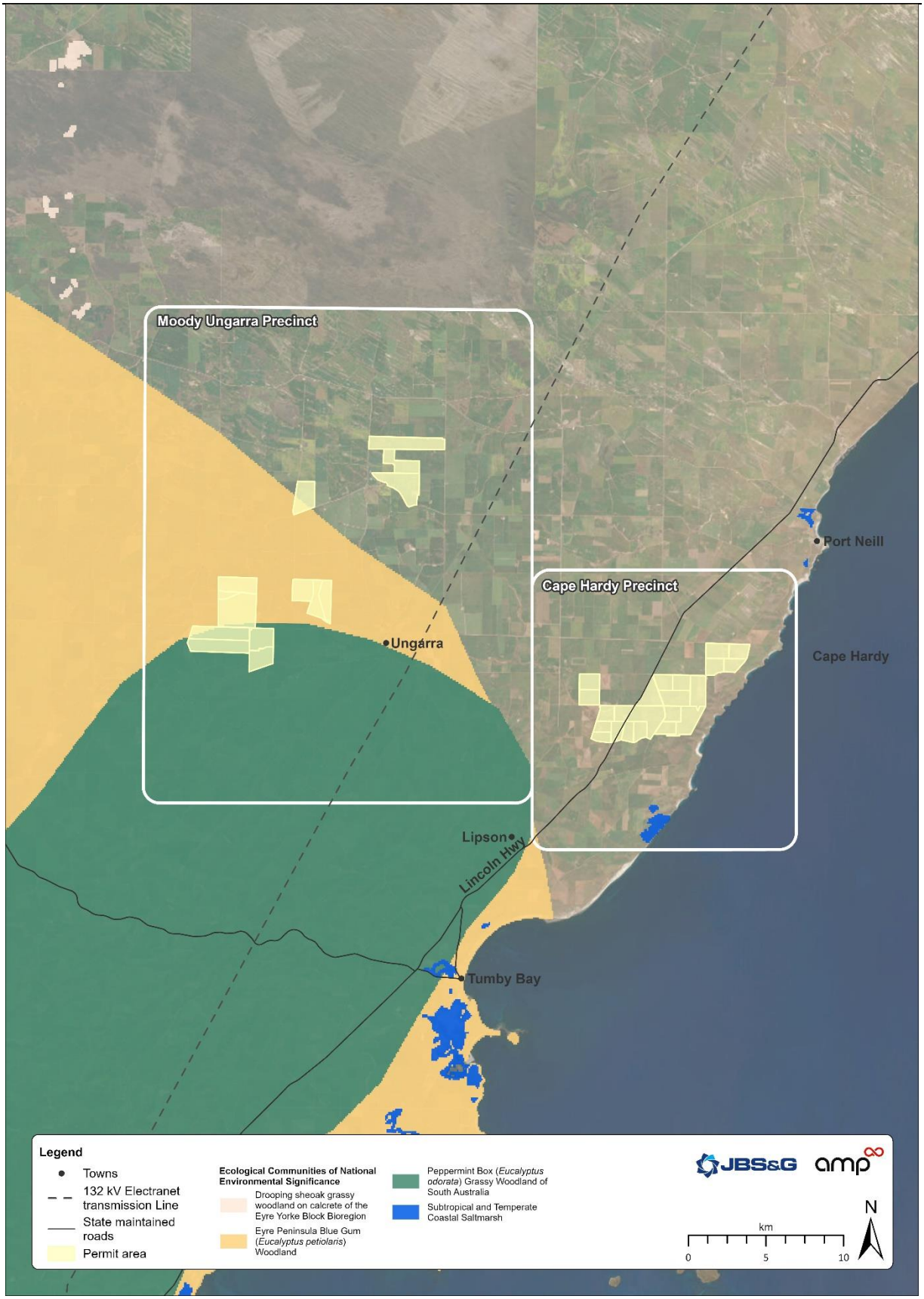

Figure 4-8: Ecological Communities of National Environmental Significance

4.4.3 Listed flora and fauna species

Listed Flora species

There are database records of threatened species listed at the Commonwealth level under the EPBC Act and at the State level under the *National Parks and Wildlife Act 1972* (NPW Act) within and near the precincts and Permit Area (DEW 2024).

Within the Moody Ungarra Precinct there are records of six Commonwealth listed flora species and 16 State rated species (excluding Commonwealth listed species) (Figure 4-9). Within the Cape Hardy Precinct there are records of one Commonwealth listed flora species and three State rated species (excluding Commonwealth listed species) (Figure 4-9).

Database records indicate the presence of State listed species within the Permit Area (Table 4-3). The presence of listed flora species will be assessed by undertaking field surveys of the Permit Area to inform siting of the met masts and to avoid any clearance of these species.

Table 4-3: Database records of Commonwealth and State listed flora species within the Permit Area

Species	Common Name	National Rating	State Rating
Acacia imbricata	Feathery Wattle		Rare
Acacia pinguifolia	Fat-leaf Wattle	Endangered	Endangered
Daviesia pectinata	Zig-zag Bitter-pea		Rare

Listed fauna species

There are records of threatened species listed at the Commonwealth level under the EPBC Act and at the State level under the NPW Act occur within and near the precincts and Permit Area (DEW 2024).

Within the Moody Ungarra Precinct there are records of three Commonwealth listed fauna species and 16 State rated species (excluding Commonwealth listed species) (Figure 4-10; Table 4-5). Within the Cape Hardy Precinct there are records of one Commonwealth listed fauna species and 12 State rated species (excluding Commonwealth listed species) (Figure 4-10; Table 4-6).

Database records indicate the presence of State listed species within the Permit Area (Table 4-4). The presence of listed fauna species or suitable habitat will be assessed by undertaking field surveys of the Permit Area to inform siting of the met masts and to avoid impacts to these species.

Table 4-4: Database records of Commonwealth and State listed fauna species within the Permit Area

Species	Common Name	National Rating	State Rating
Ardeotis australis	Australian Bustard		Vulnerable

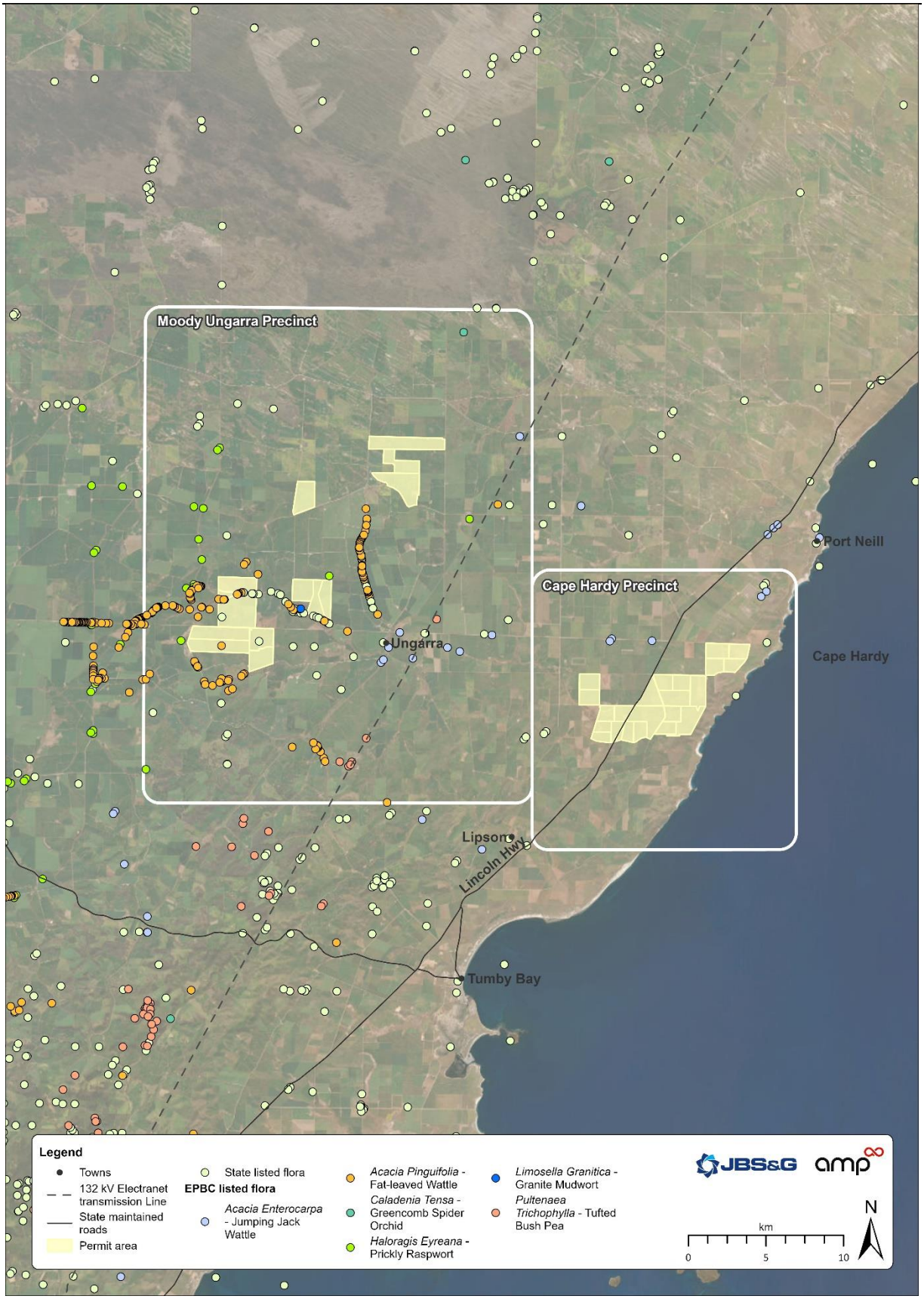

Figure 4-9: Database records of Commonwealth and State listed flora species

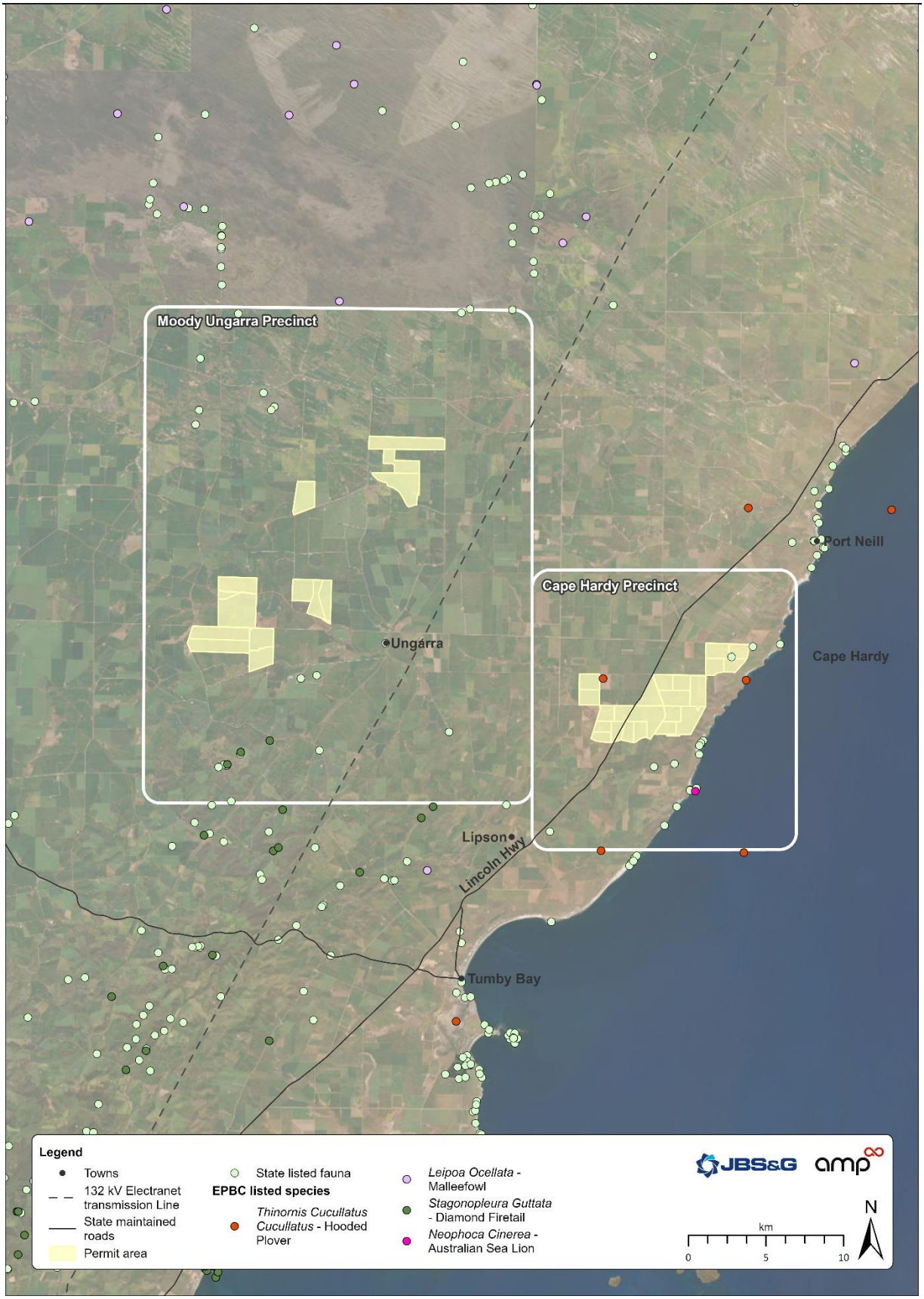

Figure 4-10: Database records of Commonwealth and State listed fauna species

Table 4-5: Commonwealth and State listed fauna species recorded in the Moody Ungarra Precinct

Species	Common Name	National Rating	State Rating
Aphelocephala leucopsis leucopsis	Southern Whiteface	Vulnerable	No
Corcorax melanorhamphos	White-winged Chough		Rare
Corcorax melanorhamphos whiteae	White-winged Chough (Gawler Ranges, EP, southern FR, MLR)		Rare
Falco peregrinus macropus	Peregrine Falcon		Rare
Gerygone fusca fusca	Western Gerygone (Eyre Peninsula)		Rare
Hylacola cauta cauta	Shy Heathwren (EP, YP, FR, MM, upper SE)		Rare
Leipoa ocellata	Malleefowl	Vulnerable	Vulnerable
Lichenostomus cratitius occidentalis	Purple-gaped Honeyeater (mainland SA)		Rare
Neophema elegans elegans	Elegant Parrot		Rare
Stagonopleura guttata	Diamond Firetail	Vulnerable	Vulnerable
Strepera versicolor	Grey Currawong		Endangered
Trichosurus vulpecula	Common Brushtail Possum		Rare
Turnix varius varius	Painted Buttonquail		Rare

Table 4-6: Commonwealth and State listed fauna species recorded in the Cape Hardy Precinct

Species	Common Name	National Rating	State Rating
Actitis hypoleucos	Common Sandpiper		Rare
Ardeotis australis	Australian Bustard		Vulnerable
Falco peregrinus macropus	Peregrine Falcon		Rare
Falco subniger	Black Falcon		Rare
Haematopus fuliginosus fuliginosus	Sooty Oystercatcher		Rare
Haliaeetus leucogaster	White-bellied Sea Eagle		Endangered
Neophema petrophila zietzi	Rock Parrot		Rare
Pandion haliaetus cristatus	Eastern Osprey		Endangered
Pluvialis fulva	Pacific Golden Plover		Rare
Thinornis cucullatus cucullatus	Hooded Plover	Vulnerable	Vulnerable

4.4.4 Migratory species

Within the Cape Hardy Precinct there are records of one Commonwealth listed migratory species: *Actitis hypoleucos* Common Sandpiper. There are no records of Commonwealth listed migratory species within the Moody Ungarra Precinct.

4.4.5 Weeds, pests and pathogens

Weeds of National Significance (WoNS) have been observed within the Cape Hardy GHP Area (Figure 4-11), including but not limited to *Asparagus asparagoides f. asparagoides* Bridal Creeper, *Cenchrus ciliaris/pennisetiformis* Buffel Grass and *Lycium ferocissimum* African Boxthorn. Records are more concentrated along roads however this may be reflective of where there is greater ease of access compared to within the land parcels.

There are no records of phytophthora in the locality (NatureMaps, 2024).

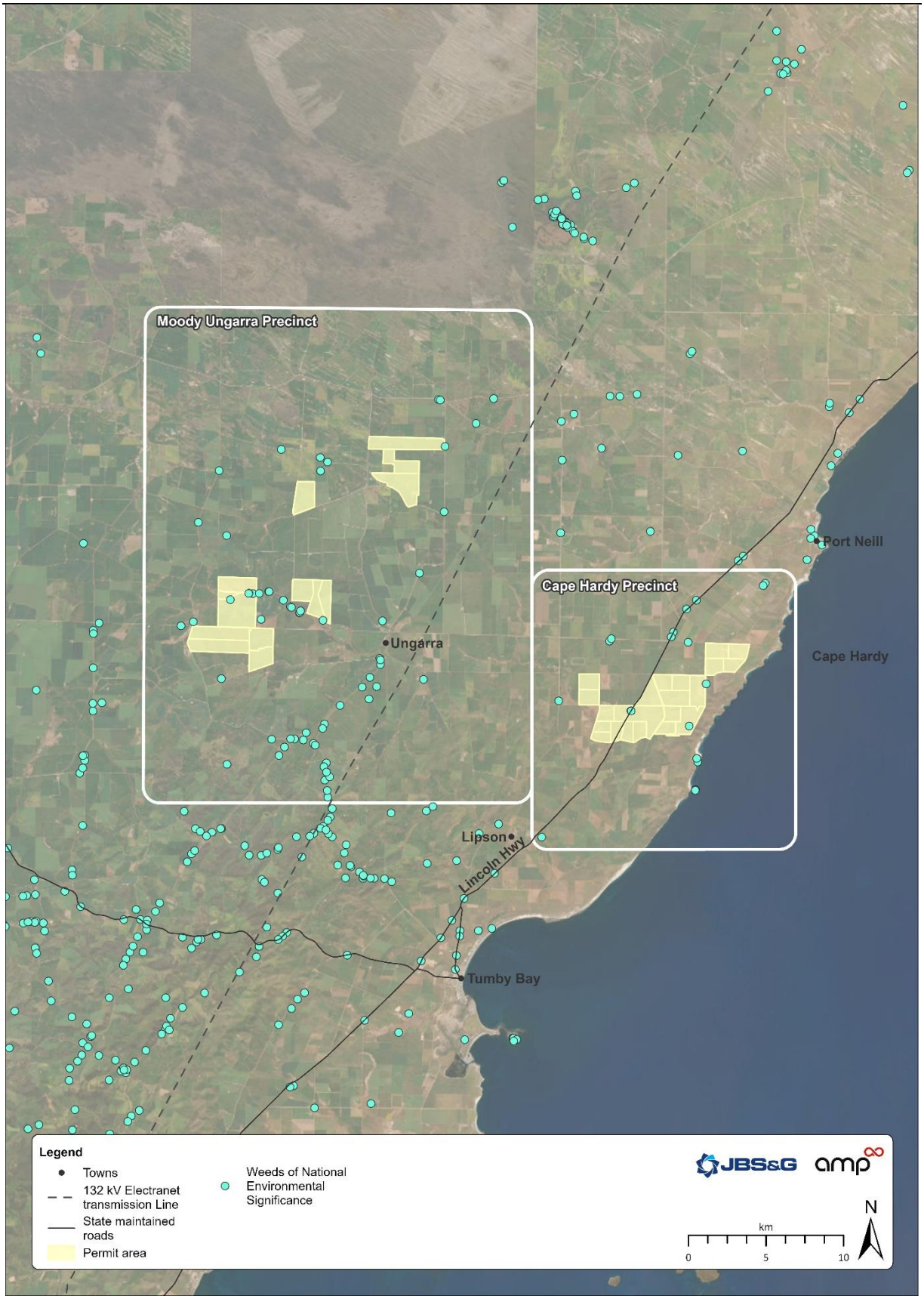

Figure 4-11: Weeds of National Significance

4.5 Land Use and Tenure

4.5.1 Agriculture

Much of the land within the locality has been cleared for agricultural purposes, including broadacre production of mixed cereals including wheat and canola and the grazing of livestock. In areas of higher rainfall, pulses and oilseeds are also cropped.

The land use within the Permit Area is broadacre agriculture.

4.5.2 Mining

There are various exploration (mineral and energy resources) tenures and mining leases across the Eyre Peninsula, some of which interact with the Cape Hardy GHP (Figure 4-12).

A deep-sea port and related infrastructure for export of iron from Iron Road's Central Eyre Iron Project were approved for the Cape Hardy area in 2018, but have not yet been constructed.

The Cape Hardy GHP falls within three petroleum/gas/gas storage exploration licences (PEL/GEL/GSEL) and six mineral exploration licences.

The Permit Area itself falls within three petroleum/gas/gas storage exploration licence, and three mineral exploration licences. The holders of these tenements are considered to be stakeholders for the purposes of this REFP, and will be consulted in line with the approved Stakeholder Consultation Plan.

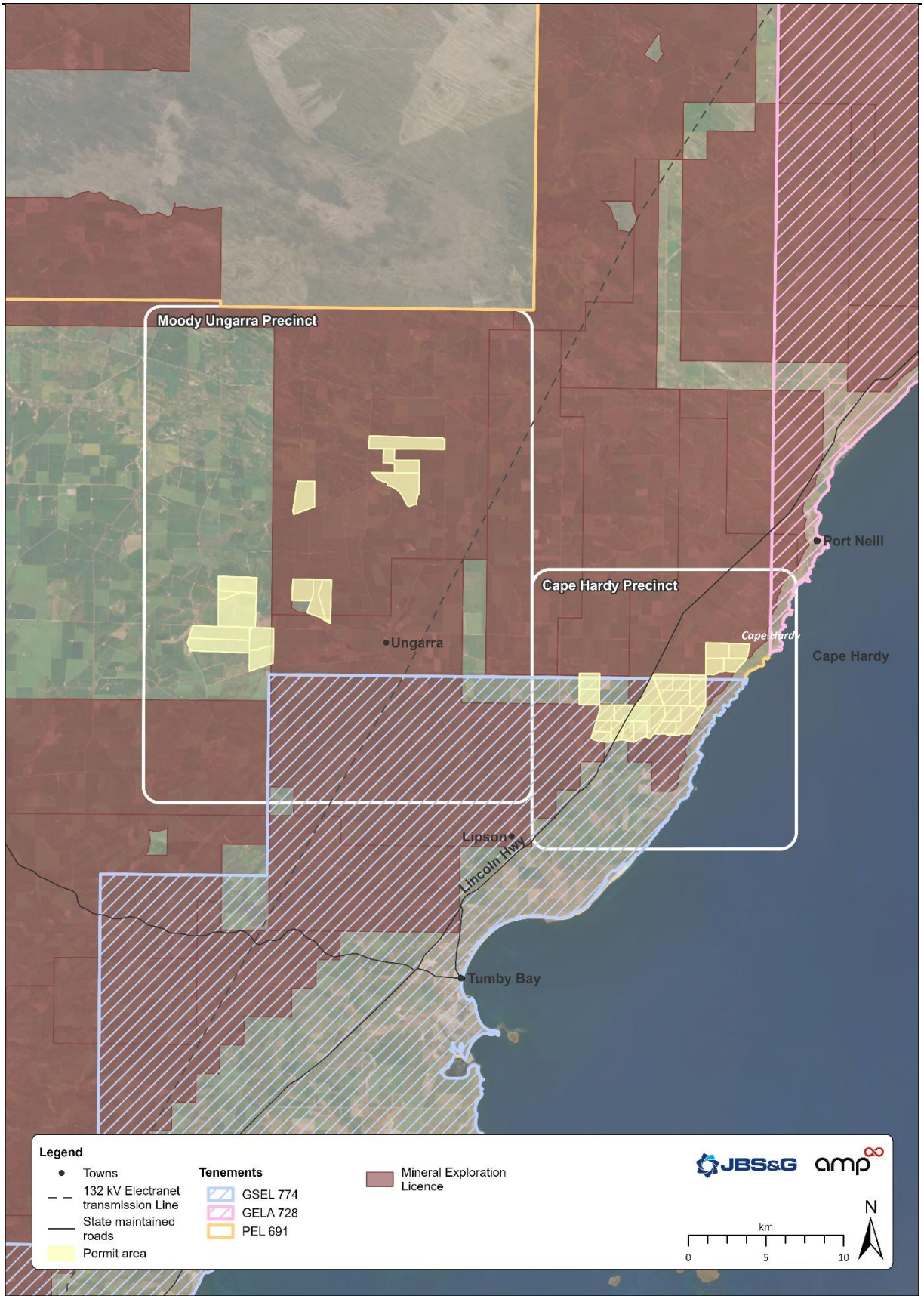

Figure 4-12: Existing tenements within the Cape Hardy GHP

4.5.3 Tourism

The Eyre Peninsula is a popular tourist destination known for its beaches, camping, surfing, swimming and recreational fishing. Port Neill and Tumby Bay are the nearest coastal townships to the Cape Hardy GHP and feature foreshores, jetties, a range of tourist accommodation, hospitality and retail facilities. The two largest cities on the Eyre Peninsula are Port Lincoln to the south, and Whyalla to the north, both of which enjoy an influx of tourists during summer, and which are connected by the Lincoln Highway, which traverses the Cape Hardy GHP.

The Permit Area, which comprises of privately held land, is not known to be a tourist destination.

4.5.4 Existing infrastructure

Existing electricity distribution infrastructure in the Cape Hardy GHP is reflective of the rural nature of the region, and includes numerous overhead transmission lines including high voltage and low voltage distribution lines, transformer stations and substations.

In the Moody Ungarra Precinct, there are overhead transmission lines that connect to multiple residential properties. There is a direct connection from within the Permit Area to the Lipson 11/19KV Transformer Station, Tumby Bay Substation, and the Cummins Substation.

The Lincoln Highway, the main thoroughfare between Port Lincoln and Whyalla. A number of local roads including but not limited to Richardson Road, Baldiserra Road, West Dog Fence Road, and Ungarra-Yeelanna Road exist within the Cape Hardy and Moody Ungarra Precinct. None of these roads traverse through the Permit Area, however, the Lincoln Highway does go through a small section on the Western Side of the Permit Area.

4.5.5 Conservation areas

The Moody Tank Conservation Park (CP) is located within the Moody Ungarra Precinct approximately 26 km north-east of Cummins. The CP was proclaimed by notice in the South Australian Government Gazette on 7 December 2006 under the NPW Act and is held under a Crown Record in the name of the Minister for Environment. The land comprising the Moody Tank CP is also subject to the State Significant Native Vegetation Overlay under the Planning and Design Code which seeks to protect, retain and restore significant areas of native vegetation. Given its protected status and importance with respect to native vegetation, the Moody Tank CP will not be accessed by Revera or otherwise utilised. The Moody Tank CP is not within the Permit Area.

The Hincks CP is located on the northern boundary of the Moody Ungarra Precinct. It will not be accessed by Revera or otherwise utilised.

The Cape Hardy Precinct includes parcels of land incorporated into a larger Land Management Agreement (LMA) which was originally established between the DCTB and a former landowner. Several of the land parcels comprising the LMA have been sold to other parties, including two parcels in relation to the Cape Hardy GHP, currently owned by Iron Road Limited, and additional land parcels to the south of Kiandra Road within the Cape Hardy Precinct. The District Council of Tumby Bay has waived the requirements under the Land Management agreement until at least 27 November 2029 for the Cape Hardy Port site, in accordance with clause 4.2 of Land Management Agreement 9447555 of the LMA.

There are no other parks, reserves or Wilderness Protection Areas within the Cape Hardy GHP.

4.6 Native Title

The eastern Eyre Peninsula is located on lands traditionally owned by the Barngarla People. The Barngarla Native Title Claim (SC1996/004) was determined by the Federal Court in June 2016 as native

title rights and interests existing in parts of the determination area (SCD2016/001). The Barngarla People's interests are managed by the Barngarla Determination Aboriginal Corporation (BDAC).

The majority of land within the Barngarla Native Title Claim comprises freehold land, perpetual leases and public road reserves which are tenures that have extinguished native title rights and interests. Other land tenures such as Crown Record have been individually considered for native title status by the Federal Court (as part of the Barngarla native title determination) and the National Native Title Tribunal has published maps indicating areas of extinguishment and areas where native title exists, either exclusively or non-exclusively.

The tenure within the Permit Area where the met masts will be located is freehold land where native title rights and interests have been extinguished.

4.6.1 Indigenous Land Use Agreements

The Barngarla People / BDAC have a registered Indigenous Land Use Agreement (ILUA) with Iron Road Limited in respect of its Central Eyre Iron Project that includes a small part of the Cape Hardy Precinct REFP area (SI2016/002 dated 2016 and varied SI2022/001 in 2022). There is also a coastal ILUA between the State of South Australia and the Barngarla in relation to a narrow strip of coastal land on the Spencer Gulf, extending from the south of Port Augusta to the south of Port Lincoln (SI2018/003).

The other registered Barngarla ILUA in the Cape Hardy Precinct Area is the Port Spencer ILUA with Free Eyre Limited north of Tumby Bay and Lipson Cove for a deep-sea port (SI2020/001). In addition, Revera understands that the State Government will enter into an ILUA with BDAC in respect of those elements of the Northern Water project that fall within the Barngarla Native Title Claim.

4.7 Aboriginal Cultural Heritage

A heritage register search sourced from the Register of Aboriginal Sites and Objects, part of the Central Archive maintained by Aboriginal Affairs and Reconciliation with the Attorney-General's Department has been undertaken.

The search results revealed that there are three registered archaeological sites, and one currently unregistered site, all located within the Cape Hardy Precinct and the three registered sites being along / adjacent to the Lincoln Highway. None of these known sites will be impacted by the Proposed Activities. There are no registered or recorded sites with the Moody Ungarra Precinct.

It is expected that there is a low risk in relation to developed areas away from creeks and the coastal margin, and a high risk along creek margins, the coastal margin and along the margins of waterways. However, prior to siting of any met masts, consultation with the Traditional Owners, the Barngala People via BDAC will be undertaken regarding Aboriginal Heritage matters, and this EIR and SEO to inform final siting and reduce the risk of any impacts to unknown Aboriginal values, sites, objects or remains.

It is also noted that all Aboriginal sites, objects and remains, whether known or unknown, are protected under the *Aboriginal Heritage Act 1988* and it is an offence to damage, disturb or interfere with an Aboriginal site, objects or remains unless written authorisation is obtained from the Minister for Aboriginal Affairs and Reconciliation. Additionally, any discovery of potential human remains must be immediately reported by SAPOL, as required by the *Coroner's Act 2003*. Revera will develop a Cultural Heritage Management Plan which is to be endorsed by BDAC prior to implementation to ensure appropriate procedures are in place to meet the requirements under this and the HRE Act.

4.8 Non-Aboriginal Heritage

A desktop assessment in relation to non-Aboriginal Heritage was undertaken to determine the presence of any known areas or places of heritage importance and included searches of the following databases:

- The Australian Heritage Database – for world heritage places, national heritage places and Commonwealth heritage places.
- The South Australian Heritage Places Database – for places of state and local heritage significance.
- The South Australian Register of Historic Shipwrecks
- Australasian Underwater Cultural Heritage Database.

There are two State Heritage places within the Moody Ungarra Precinct, being Moody Tanks and the Stokes Church at Ungarra.

The Moody Rocks Water Tank (also known as the Moody Reservoir) is located within the Moody Tank CP and was listed on the South Australian Heritage Register on 23 April 1992. It was initially constructed in 1913 to supply water to steam locomotives using the railway line on the south side of Yellana Road. This heritage place will not be accessed or otherwise utilised by Revera.

The Stokes Church, listed on 16 July 1998, will also not be accessed or otherwise utilised by Revera.

Local heritage places within proximity to the Permit Area includes various churches in Lipson, the Warrata Vale School and a dwelling in Lipson, and the Wallaby Sam Monument on the foreshore at Lipson Cove, none of which will be impacted by the Proposed Activities.

The Australasian Underwater Cultural Heritage Database search revealed that the Three Sisters Shipwreck, a ketch that was wrecked in 1899, lies just off the coast at Lipson Cove. This shipwreck will not be impacted.

4.9 Amenity

There are numerous potentially sensitive receptors present within the Permit Area. Based on aerial imagery, approximately 34 sensitive receptors were identified within the Permit Area and including a 1 km buffer, which primarily includes private residences. Sensitive receptors within and surrounding the Permit Area, would need to be verified through ground truthing.

The final installation locations for the met masts will be selected and refined to minimise the potential for amenity impacts on identified sensitive receptors.

4.9.1 Noise

The existing noise environment of the Cape Hardy GHP can be characterised as being influenced primarily by natural sources such the wind, insects and birds, and/or the ocean, and secondarily by local road traffic and agricultural activities.

4.9.2 Air quality

Ambient air quality across the Cape Hardy GHP is expected to be good, typical of a sparsely populated rural environment where the principal land uses are cropping and livestock grazing.

The most significant existing pollution sources in rural areas typically include wind-blown dust, including both natural and dust generated by agricultural activities and traffic on unsealed roads. Additional existing pollution sources typically include emissions from agricultural machinery and cars, and aerosols from pesticide and fertilizer spraying. Dust storms, bushfires or controlled burns could also sporadically impact the ambient air quality.

4.9.3 Landscape and visual amenity

The central Eyre Peninsula is dominated by sand dune covered plains with a generally undulating landscape. The land is predominantly cleared for agricultural purposes with areas of native vegetation throughout. At a height of up to 160 m, each met mast will be visible to directly impacted landowners, and potentially visible to neighboring properties and, depending on final location, users of local roads. Refer Plate 3-1 and Plate 3-2 for an example of a met mast within a typical rural setting.

While the residential receptors are distributed relatively evenly throughout the area, the only major road within the Cape Hardy GHP is the Lincoln Highway, in addition to numerous smaller local roads that are utilised by residents and other travellers alike.

Due to the rural nature of the locality, there are expected to be relatively few transient receptors (predominantly through traffic on highways), which may constrain the extent of any visual impacts arising from met masts. Residences within visual proximity of the met masts are considered to be the receptors most likely to experience a degree of visual impact.

An example of the visual impact of a 100 m tall met mast in a rural setting is provided in Plate 4-1.

Plate 4-1: Example of 100 m tall met mast. Picture taken ~750m from base
(Source: Vestas)

4.10 Socio-economic environment

The REFP is located entirely within the DCTB. At the 2021 Census, the DCTB region had a population of 2,817 residents with a median age of 52 years. The top two industries of employment were Other Grain Growing (10.9%), Grain – Sheep or grain – Beef Cattle Farming (7.6%) (Australian Bureau of Statistics (ABS), 2021a). Beyond agriculture, the areas are popular for commercial and recreational fishing and tourism (including camping and swimming).

The coastal towns of Port Neill and Tumby Bay, both of which are popular tourist destinations, in addition to seaside retreats for many inland farming families that own holiday homes in the vicinity. At the 2021 Census, Port Neill (suburbs and localities) had a small residential population of 218 people with a median age of 56 years (ABS, 2021b). Tumby Bay (suburbs and localities) is significantly larger than Port Neill with a reported population of 1,781 residents at the 2021 Census with a median age of 57 years (ABS, 2021c).

5 Environmental Impact Assessment

This section summarises the methodology and results of the environmental impact assessment for REFP activities.

5.1 Methodology

The impact assessment method has been developed in accordance with the Environmental Impact Assessment Criteria published under the HRE Act (DEM 2024a), using guidance provided in the Environmental Impact Assessment Criteria Guideline (DEM, 2024b).

The impact assessment was undertaken using the following steps:

- **Identifying environmental elements** that could be impacted by the proposed regulated activities (Criteria 1).
- **Identifying the potential impact events** that could impact elements of the environment during the construction, operation and decommissioning phases (Criteria 2).
- **Confirming the potential of impact events** to occur (Criteria 3).
- **Identifying relevant control and management strategies** for each potential impact event, needed to eliminate or otherwise reduce any potential environmental harm to as low as reasonably achievable (part Criteria 4).
- **Identifying uncertainties and assumptions** associated with the effectiveness of control and management strategies (part Criteria 4).
- **Assessing environmental significance** of each potential impact event, considering factors such as the frequency, duration, extent and severity of impacts and the sensitivity of the receiving environment (Criteria 5).
- **Using a risk assessment framework to evaluate uncertainty or unplanned events** where relevant (part Criteria 4).
- **Developing environmental objectives and assessment criteria** for all potential impacts were determined for the elements of the environment. These objectives will be carried through to the SEO (Criteria 6).

The results of the impact assessment were then captured in the impact assessment summary tables provided in Section 5.3.

The steps followed in the impact assessment are described below.

5.1.1 Identifying environmental elements

Elements of the environment that have the potential to be impacted by the regulated activities were first identified. All phases of the regulated activities including construction, operation and closure were considered.

The following elements of the environment were identified and considered in this environmental impact assessment:

- soil and land quality
- surface water
- groundwater
- flora and fauna and biodiversity

- Aboriginal and non-Aboriginal heritage
- air quality
- noise and vibration
- visual amenity
- social environment (including infrastructure and land use)
- public health and safety.

Further details on these elements are provided in Section 5.3.

5.1.2 Identifying potential impact events

Elements of the environment may be impacted in different ways by the regulated activities. All potential impacts from the regulated activities were identified and defined as potential impact events[4].

Each potential impact event was characterised by:

- the source of impact, defined as the activities associated with the proposed operation that could reasonably be expected to negatively impact a receptor for the environmental element (considering construction, operation or decommissioning and rehabilitation stages)
- the pathway of impact, defined as the mechanism by which a proposed activity may interfere with environmental elements
- the environmental receptor of impact, defined as the component of the environmental element that may be detrimentally affected by the proposed activity in the absence of control measures.

Any uncertainties in the identification and description of the sources, pathways and environmental receptors as a result of assumptions or knowledge gaps were identified for each potential impact event.

5.1.3 Confirming the potential of impact events to occur

For each potential impact event, the occurrence of the source, pathway and environmental receptor within the proposed regulated activities scope and at the proposed location was verified.

Potential impact events for which the full source, pathway and environmental receptor linkage was confirmed were considered as having the potential to occur and relevant control and management measures were then identified (refer Section 5.1.4).

Potential impact events for which the source, pathway and environmental receptor linkage was incomplete were not considered as having the potential to occur and were not considered further in this environmental impact assessment. These are summarised in Table 5-5.

This verification process also considered whether the impact event and the occurrence of the source, pathway and environmental receptor linkage was:

- planned and expected to occur (e.g. native vegetation clearance for site establishment), or
- unplanned and not expected to occur, but could occur as a result of factors such as extreme weather events, human error or failure of control strategies.

Where the source, pathway and environmental receptor linkage could only occur as a result of an unplanned event, this is noted in the impact assessment summary tables in Section 5.3.

[4] Both typical and atypical events were considered, in accordance with DEM (2024b).

5.1.4 Identifying relevant control and management strategies

Measures to control and manage potential impact events were identified. The hierarchy of controls approach was adopted consistently with the Environmental Impact Assessment Criteria Guideline (DEM, 2024b). Identification of control and management measures considered the following priority of order:

- **Elimination** measures that eliminate the source of a potential impact event, preventing the impact from occurring.
- **Substitution** measures that replace the material or process at the source of a potential impact event with a less hazardous one, significantly reducing the likelihood of a potential impact event to occur.
- **Design and engineering (physical) control** measures that act to separate the source from the pathway and environmental receptor to either:
    - avoid or reduce the likelihood of a potential impact event to occur, or
    - avoid or reduce the consequences of an impact event occurring.
- **Management system control** measures that implement a procedure to manage the activity at the source of a potential impact event to either:
    - avoid or reduce the likelihood of a potential impact event to occur, or
    - avoid or reduce the consequences of an impact event occurring.

5.1.5 Identifying uncertainties and assumptions

Uncertainties and assumptions related to the likely effectiveness of the proposed control and management strategies were identified. This included the assumptions underlying any analysis or modelling undertaken to assess potential impacts and effectiveness of proposed measures.

Where relevant, a risk assessment framework was used to evaluate uncertainty and unplanned events (refer to Section 5.1.7).

5.1.6 Assessing environmental significance

The level of significance of potential impacts was assessed, considering the following factors outlined in the Environmental Impact Assessment Criteria Guideline (DEM, 2024b):

- the level to which a potential impact can be avoided through elimination (prevention)
- the estimated frequency of the potential impact occurring
- the anticipated duration of the potential impact
- the extent of the potential impact
- the severity of the potential impact
- the cumulative effects (if any) of the potential impact when considered in conjunction with other impacts on the same receptor
- the sensitivity of the receiving environment.

The significance of the impact was categorised using the criteria in Table 5-1 and Table 5-2 (which were developed to broadly encompass the factors listed above). The category of significance[5] and more

[5] The impact summary tables categorise the expected impact (i.e. the planned or predicted impact) and, where there is potential for an unplanned event, also evaluate this using a risk assessment framework (refer Section 5.1.7).

detailed discussion of the factors listed above (where relevant) are provided in the impact assessment summary tables in Section 5.3.

Impacts were considered acceptable if they were in the 'Negligible' category, while impacts in the 'Minor' or 'Moderate' category were generally considered acceptable if they were as low as reasonably practicable (ALARP) following the application of mitigation measures. Major and catastrophic impacts were considered unacceptable necessitating redesign of the regulated activities. Commentary on whether the impacts are ALARP for 'Minor' or 'Moderate' impacts is provided in the impact assessment summary tables in Section 5.3.

The environmental significance assessment took account of any proposed controls or management measures.

Table 5-1: Categorisation of impact - biophysical environment

Category	Flora and fauna	Soil and land quality	Surface and groundwater	Land Use
Negligible	Local short-term (< 12 months) decrease in abundance of some species without reduction in local community viability. Impact level not measurable on listed species.	Localised and short-term (< 6 months) soil disturbance with low erosion potential. Soil contamination level is not measurable. No measurable impact on landform.	Minimal change with no measurable loss of water quality or quantity.	No measurable impact to current or future land uses
Minor	Local long-term decrease in abundance of some species resulting in little or no change to community structure. Local short-term (< 12 months) decrease in listed-species abundance with no lasting effects on their local population.	Small change in geomorphology within localised portions of landform.	Local short-term (< 6 months) reduction in water quality or quantity.	Minor repairable damage to land or disruption to land use with no compromise to ongoing or future land use
Moderate	Regional long-term decrease in abundance of some species resulting in some change to the community structure. Local long-term decrease in listed-species abundance without reduction in their regional population viability.	Soil disturbance with a high risk of offsite erosion potentially requiring months of remediation with short-term loss of land capability. Local contamination that can be remediated in less than 12 months. Widespread small changes in geomorphology.	Regional long-term decrease in abundance of some species resulting in some change to the community structure. Local long-term decrease in listed-species abundance without reduction in their regional population viability.	Damage to land and infrastructure that results in remediation costs and / or loss of income of up to $1 million
Major	Regional long-term decrease in abundance of numerous species and / or some loss of species diversity resulting in significant changes to community structure. Regional long-term decrease in listed-species abundance and / or local loss resulting in reduction in regional viability.	Soil disturbance with a high risk of erosion potentially requiring years of remediation with long-term loss of land capability. Widespread contamination that can be remediated in less than 12 months. Localised major changes in geomorphology.	Widespread (regional) short-term reduction in water quality or quantity.	Damage to land and infrastructure that results in remediation costs and / or loss of income of up to $10 million
Critical	Regional long-term loss of numerous species resulting in the dominance of only a few species. Regional extinction of at least one listed-species.	Extensive impacts to surface soils with irreversible soil erosion and significant and widespread permanent decline in land capability. Widespread contamination that requires a regional incident response and more than 12 months to remediate. Large changes in geomorphology resulting in effects beyond footprint	Widespread (regional) long-term reduction in water quality or quantity.	Extensive damage to land or disruption to land use that results in remediation costs and / or loss of income of over $10 million

Table 5-2: Categorisation of impact - people and amenity

Category	Heritage	Landscape and visual amenity	Noise and air quality	Public health and safety	Socio-economic
Negligible	No impact to matters of heritage significance.	Limited / no visual effect on the landscape, visible as a very minor feature in some locations. No discernible deterioration or improvement in the existing view at a sensitive receptor location.	Recognised standards meet at all times.	No injury or illness.	No impact or small reparable socio-economic impacts on local population.
Minor	Impact to locally significant heritage matters that is readily rectified.	Developments can be seen in the visual field and alter the landscape to a small degree. A barely perceptible deterioration in the existing view at sensitive receptor locations.	Isolated and localised exceedance of recognised standards. Complaints received about air quality that are resolved within days.	An injury or illness that does not require first aid or medical treatment.	Short-term (< 6 months) impacts on local businesses and / or wellbeing of local communities.
Moderate	Damage to State or nationally listed / significant natural, cultural or historic heritage that can be rectified so that it does not alter its heritage significance.	Developments are obvious but do not dominate the landscape. Noticeable deterioration in the existing view at sensitive receptor locations.	Local ongoing exceedance of recognised standards, or widespread short-term (< 1 month) exceedance of recognised standards, that do not result in hospitalisation of members of the public. Ongoing complaints.	Injury or illness requiring first aid or medical treatment.	Ongoing impacts on a limited number of local businesses and / or wellbeing of a limited number of local community members.
Major	Permanent damage to State or nationally listed / significant natural, cultural or historic heritage that results in a loss of heritage significance.	Developments are very obvious in the visual field and dominate the landscape. Significant deterioration in the existing view at multiple sensitive receptor locations.	Widespread short-term exceedance of recognised standards resulting in hospitalisation of members of the public.	Injury or illness that results in hospitalisation or disablement.	Ongoing impacts on the wellbeing of regional communities that results in a significant proportion of the community leaving the area and / or serious mental health issues across the affected communities
Critical	Destruction or permanent damage to State or nationally listed / highly significant natural, cultural or historic	Developments dominate the visual field and dramatically alter the landscape from	Public exposed to an exceedance of recognised standards that results in severely debilitating chronic	Injury or illness that results in fatality or long-term disability.	Ongoing impacts to regional businesses that result in closures and (direct and indirect) loss of employment for

Category	Heritage	Landscape and visual amenity	Noise and air quality	Public health and safety	Socio-economic
	heritage (resulting in the site no longer meeting the listing criteria where applicable)	multiple and widespread sensitive receptor locations.	health impacts or life-threatening hazards		more than 100 employees and / or towns in the region becoming unviable Suspension of important community services (e.g. transport, telecommunications, energy) for several weeks or more.

5.1.7 Risk assessment to evaluate uncertainty and unplanned events

A risk assessment framework was used to evaluate uncertainty and unplanned events (for those impact events where the assessment identified significant uncertainty in the likely effectiveness of control strategies and/or the potential for unplanned events to occur).

The risk assessment considered:

- the credible worst-case consequence (defined using the categories of impact in Table 5-1 and Table 5-2) that could occur if assumptions regarding the likely effectiveness of proposed control measures were incorrect
    - the likelihood of such a consequence occurring (as described below in) Table 5-3.

The level of risk was then categorised using the matrix in Table 5-4.

Brief discussion of the results of the risk assessment is provided in the impact assessment summary tables in Section 5.3 for relevant impact events.

Table 5-3: Description of likelihood

Likelihood	Description
Almost certain	This consequence is expected to occur in most circumstances.
	Expected to occur at least once each year.
Likely	This consequence may occur in some given circumstances.
	May occur during any given year.
Possible	This consequence might occur at some time.
	Not likely to occur in any given year but is possible.
Unlikely	This consequence could occur at some time.
	Very unlikely to occur in any given year.
Rare	This consequence may only occur in very exceptional circumstances.
	Examples of this have occurred historically but are not anticipated.

Table 5-4: Risk rating matrix

Risk matrix		Consequence				
		Negligible	Minor	Moderate	Major	Critical
Likelihood	Almost certain	Low	Medium	High	Extreme	Extreme
	Likely	Low	Medium	High	Extreme	Extreme
	Possible	Low	Low	Medium	High	Extreme
	Unlikely	Low	Low	Medium	High	High
	Rare	Low	Low	Low	Medium	Medium

5.1.8 Developing environmental objectives and assessment criteria

Environmental objectives and assessment criteria were developed for all potential impacts determined through the environmental impact assessment process. Objectives were developed to

align with the elements of the environment. These objectives are defined in the impact assessment summary tables provided in Section 5.3 and will be carried through to the SEO.

Leading performance criteria were also developed for impact events that rely significantly on a control strategy to reduce the potential environmental impact.

5.2 Confirmation of Impact Event S-P-R Linkage

As outlined in Section 5.1.3, only those potential impact events that have been confirmed as having a full source, pathway and environmental receptor linkage have been carried through the full impact assessment process.

Table 5-5 lists the potential impact events that have been considered for the activities and summarises the determination of the source-pathway-receptor linkage, including for potential impact events where the linkage has been assessed as incomplete (and which have consequently not been carried further through the impact assessment process).

Table 5-5: Confirmation of impact event S-P-R linkage for the meteorological mast activities

Potential Impact Event	Source	Pathway	Receptor	S-P-R Linkage - Confirmation and Justification	Assumptions / uncertainties and sensitivity to change	Impact ID
Soil and Land Quality						
Spills of fuel or chemicals result in localised soil contamination	Potential hydrocarbon spills from vehicles and construction equipment Potential spills from used and stored chemicals	Uncontrolled release	Soil quality	**Yes** (unplanned event) Small volumes of fuel and chemicals may be present on-site during construction. An unplanned event resulting in a release of hydrocarbons or chemicals could result in localised contamination of land.	See impact table in Section 5.3.1	SOI01
Vegetation clearance, earthworks and use of roads and tracks result in soil inversion, compaction or erosion and in reduced land quality	Vegetation clearance and earthworks for meteorological mast installation and construction of temporary access tracks	Direct disturbance	Landform Users of Land Vegetation	**Yes** Earthworks will be required during construction and decommissioning as such there is the potential for limited/small-scale soil impacts.	See impact table in Section 5.3.1	SOI02
Inappropriate waste management results in localised soil contamination	Generated wastes (solid and liquid)	Uncontrolled release	Soil quality	**Yes** (unplanned event) Small quantities of waste may temporarily be present on-site during construction and decommissioning. An unplanned event resulting in a release of solid or liquid waste could result in localised contamination of land.	See impact table in Section 5.3.1	SOI03
Disturbance of existing contaminated soil or acid sulfate soil (ASS) resulting in spread of contamination	Vegetation clearance and earthworks for meteorological mast installation and construction of temporary access track or laydowns	Soil disturbance	Soil quality	**No** The ASS potential, across the majority of the project area, is characterised as having a negligible potential for ASS development. Small patches are characterised as having more than 60% potential to develop ASS however these areas are restricted to ephemeral drainage lines, which will be avoided for siting of the meteorological masts. There are no registered contaminated sites (Section 83A sites) in the region. Meteorological masts will not be located in sites where contaminated soils or acid sulfate soils are identified during planning.	Assumes site selection and planning avoid existing contaminated soil (if present).	SOI04

Potential Impact Event	Source	Pathway	Receptor	S-P-R Linkage - Confirmation and Justification	Assumptions / uncertainties and sensitivity to change	Impact ID
Surface Water						
Spills of fuel or chemicals result in a deterioration of surface water quality	Potential hydrocarbon spills from vehicles and construction equipment. Potential spills from chemicals being used or stored.	Drainage	Surface water user	**No** Within the permit area, there are no significant surface water features, and limited ephemeral drainage lines. The geographical extent of the permit area allows for the micro siting of meteorological masts to avoid environmental features including ephemeral drainage lines. Meteorological masts will be located at least 100 m from any surface water receptor (double the 50 m standard). No bulk chemicals or fuel storage required during any phase of the Project, and so will not be stored on site. Quantities of waste temporarily stored on site will be small. Consequently, there is no credible pathway to surface water receptors.	Assumes sites are located at sufficient distance from surface water receptors.	SWR01
Sedimentation during the activities results in a deterioration of surface water quality	Soil disturbance during temporary access track or laydowns construction.	Soil disturbance	Surface water users			SWR02
Inappropriate waste management results in deterioration of surface water	Generated wastes (soil & liquid)	Uncontrolled Release	Surface water users			SWR03
Groundwater						
Spills of fuel or chemicals result in a deterioration of groundwater quality	Potential hydrocarbon spills from vehicles and construction equipment. Potential spills from chemicals being used or stored.	Seepage	Groundwater users Groundwater Water quality	**No** Available mapping indicates that the depth to the shallowest aquifer is variable across the locality and is generally deeper than 20 m below the soil surface. No bulk chemicals or fuel storage required during any phase of the Project and so will not be stored on site. Quantities of waste temporarily stored on site will be small. Consequently, there is no credible pathway to groundwater.	Groundwater depth may be shallower than predicted, but unlikely to be sufficiently shallow for credible pathway if a release occurred, particularly given small volumes of fuel and chemicals present.	GWR01
Flora and Fauna						
Incidental clearance or disturbance of native	Vegetation clearance for meteorological mast	Direct disturbance	Native flora and fauna	**Potential** (however siting is expected to remove SPR linkage)	See impact table in Section 5.3.4	BIO01

Potential Impact Event	Source	Pathway	Receptor	S-P-R Linkage - Confirmation and Justification	Assumptions / uncertainties and sensitivity to change	Impact ID
vegetation results in a loss of native vegetation and habitat	installation and construction of temporary access track or laydowns		including threatened flora	Sites will be selected with the aim of avoiding native vegetation, however it is possible that minor unavoidable clearance may be required (e.g. regrowth of colonising native species in paddocks that have not been recently ploughed).		
Introduction and spread of weed(s), pest(s) and/or pathogen(s) alter existing vegetation structure and composition, and outcompete native vegetation	Weed/pathogen introduction and spread	Vehicle, equipment and workers movement	Native Vegetation	**Potential** (unplanned event) (however siting is expected to remove SPR linkage) Sites will be selected with the aim of avoiding native vegetation, however it is possible that without controls in place, weed introduction or spread could occur and impact areas where minor unavoidable clearance has occurred or nearby areas of native vegetation.	See impact table in Section 5.3.4	BIO02
Direct mortality of fauna as a result of collision with vehicles and infrastructure	Collision with vehicles during construction Collision with meteorological masts	Vehicle movements, direct disturbance from masts	Native fauna including avifauna	**Yes** (unplanned event) Native fauna may be present at or near the site. Injury or death may occur as a result of an unplanned event collision with vehicles or meteorological masts (e.g, collision with vehicles or meteorological masts).	See impact table in Section 5.3.4	BIO03
The activities interfere with listed threatened or migratory fauna species, resulting in reduced abundance	Construction, operation noise Pest animals Collision with masts Vehicles	Noise and Vibration Competition, predation Direct disturbance Vehicle movements	Threatened / migratory fauna	**Unknown** (unplanned event) (however siting is expected to remove SPR linkage). Areas of habitat important to threatened or migratory fauna species will be identified and avoided during the planning/design phase. However, impacts as a result of interaction with the Project could occur as a result of an unplanned event (e.g, collision with vehicles or meteorological masts).	See impact table in Section 5.3.4	BIO04
Air Quality						
Dust generated during construction activities results in a deterioration of air quality at sensitive receptors	Generation of dust during: -Meteorological masts installation	Airborne dust deposition	Local community Visitors	**Yes** An increase in dust generation and deposition in the nearby vicinity of construction activities may occur, causing amenity issues for sensitive receptors within close proximity of the activities.	See impact table in Section 5.3.5	AIR01

Potential Impact Event	Source	Pathway	Receptor	S-P-R Linkage - Confirmation and Justification	Assumptions / uncertainties and sensitivity to change	Impact ID
	-Use of temporary access tracks, unsealed roads		Fauna including livestock			
Emissions from vehicles or other equipment results in a deterioration of air quality at sensitive receptors	Vehicles and equipment	Airborne emissions	Local community Visitors, Fauna including livestock	**No** Direct emissions from vehicles and equipment do not represent a material emission source due to the small scale and short duration of the activities and expected distance from construction sites to sensitive receptors.	None	AIR02
Noise and vibration						
Noise and vibration generated by the activities reduce local amenity.	Generation of noise and vibration during construction. Meteorological masts installation and de-installation	Noise and vibration	Local community Visitors	**Yes** Activities will generate short term and transient noise emissions from surface plant and mobile fleet during construction and has the potential to cause amenity issues for sensitive receptors in the vicinity.	See impact table in Section 5.3.6	NOI01
Landscape and visual amenity						
Activities result in reduced visual amenity for the local community	Visible structure including meteorological masts	Line of sight	Local community Visitors	**Potential** (siting is expected to remove SPR linkage) Met masts will be appropriately painted, lit and fitted out in line with CASA guidance to ensure the mast is visible to aviation personnel. While buffers are in place to site away from residences and public roads and at ground level, meteorological masts are not expected to be visually intrusive, there is the potential that their presence may cause queries and complaints from visitors and/or the local community.	See impact table in Section 5.3.7	VIS01
Aboriginal and non-Aboriginal heritage						
Activities result in damage, disturbance, interference or loss of known and unknown	Vegetation clearance and earthworks for meteorological mast installation and	Disturbance	Traditional owners	**Yes** (unplanned event) Construction activities have the potential to result in the disturbance of sites, objects or remains that were not	See impact table in Section 5.3.8	HER01

Potential Impact Event	Source	Pathway	Receptor	S-P-R Linkage - Confirmation and Justification	Assumptions / uncertainties and sensitivity to change	Impact ID
Aboriginal heritage sites, objects or remains	construction of temporary access track or laydowns		Aboriginal heritage and communities	identified in the desktop assessment or not registered in the AGD-AAR database.		
The activities result in damage or loss of known and unknown non-Aboriginal heritage places or artefacts	Vegetation clearance and earthworks for meteorological mast installation and construction of temporary access track	Disturbance	Heritage values and community	**Unknown** (siting may remove SPR linkage) Construction activities may result in the clearing and disturbance of places or artefacts of heritage significance that were not identified in the desktop assessment or not registered in relevant databases.	See impact table in Section 5.3.8	HER02
Social environment, land use and infrastructure						
The activities disturb landowner infrastructure or activities	Operational activities including vehicle/worker movements and earthwork	Direct disturbance	Landowners	**Yes** (unplanned event) Limited disturbance to landowner activities may occur and construction activities could potentially result in accidental damage to landowner infrastructure.	See impact table in Section 5.3.9	SOC01
Introduction and spread of weed(s), pest(s) and/or pathogen(s) impacts to land use	Weed / pathogen introduction and spread	Vehicle, equipment and workers movement	Livestock Third-party users Landowners	**Yes** (unplanned event) Construction activities have the potential to introduce or spread weeds or pathogens.	See impact table in Section 5.3.9	SOC02
Public health and safety						
Meteorological masts increase aviation hazard with potential for aircraft collision resulting in injuries or fatalities	Meteorological mast installation	Aircraft accident	Aircraft users	**Yes** (unplanned event) The height of the meteorological masts may present a risk for local aviation. Any collision would be a result of an unplanned event.	See impact table in Section 5.3.10	SAF01
Fires caused by the activities results in injuries or fatalities to members of the public	Use of equipment and machinery	Spread of fire	Local and regional community Vegetation Flora & Fauna Landowners / Land Users	**Yes** (unplanned event) There is the low potential for fires associated with ignition sources as a result of an unplanned event.	See impact table in Section 5.3.10	SAF02

Potential Impact Event	Source	Pathway	Receptor	S-P-R Linkage - Confirmation and Justification	Assumptions / uncertainties and sensitivity to change	Impact ID
Project-related traffic increases road safety risk for local residents and other road users	Increased traffic during: -Meteorological masts installation -Construction of temporary access tracks or laydown	Road accidents	Local community Road users	**Yes** (unplanned event) There will be a small increase in traffic volumes during construction, including some large loads and potential requirement to turn into site access tracks from public roads.	See impact table in Section 5.3.10	SAF03
The activities and associated infrastructure increase public safety hazard	Activities and associated infrastructure (e.g. meteorological masts)	Direct disturbance	Local and regional community	**Yes** (unplanned event) Construction activities and presence of masts could present a public safety hazard e.g. through unauthorised access to the site by members of the public.	See impact table in Section 5.3.10	SAF04

5.3 Environmental Impact Assessment Summary Tables

The results of the environmental impact assessment for each impact event are captured in the summary tables provided in the following sections.

Brief discussion of impact significance is provided for each environmental element before the summary tables. Due to the nature of REFP activities and the relatively low level of impact, the summary tables have been used to provide the majority of the relevant information, and additional detailed discussion was not considered to be necessary.

5.3.1 Soil and land quality

Setting the context

Table 5-6 summarises legislation and non-legislated standards, views of affected parties and lists the key environmental receptors relevant to soil and land quality.

Table 5-6: Context summary for soil and land quality

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
• *Landscape South Australia Act 2019* • *Environment Protection Act 1993* • Environment Protection (Waste to Resources) Policy 2010 (Waste to Resources EPP) • South Australian Public Health (Wastewater) Regulations 2013 • Environment Protection (Water Quality) Policy 2015 • Environment Protection (National Pollutant Inventory) Policy 2008.	• Guideline EPA 080/016 Bunding and Spill Management • AS 1940 - The storage and handling of flammable and combustible liquids • Australian Dangerous Goods Code • National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) • Guideline 638/07 Site contamination – acid sulfate soil materials • National Acid Sulfate Soils Guidance (2018) – National acid sulfate soils identification and laboratory methods and manual • SA Waste Strategy 2020-2025	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. No specific issues raised from DEM led consultation (Jun – Aug 2025) relating to this environmental element.	• Soil quality • Landform • Users of land

Impact events

The impact events relevant to soil and land quality are:

- spills of fuel or chemicals result in localised soil contamination
- vegetation clearance, earthworks and use of roads and tracks result in soil inversion, compaction or erosion and in reduced land quality
- inappropriate waste management results in localised soil contamination.

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Potential impacts from the proposed activities are localised and small scale and readily manageable using standard control measures. Events such as spills or inappropriate waste management are unlikely to occur due to the limited volumes of fuels, chemicals and waste expected to be present on site and control measures to be implemented.

Evaluation of unplanned events (spills or inappropriate waste management resulting in soil contamination or extreme weather events resulting in soil erosion) has indicated that the level of risk from unplanned events is **low**.

Environmental impact and significance assessment

The following tables detail the impact assessment for the identified impact events.

Soil and land quality: Impact ID #SOI01						
Impact Event	Spills of fuel or chemicals result in soil contamination					
Potential impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR uncertainties and assumptions**
	Potential hydrocarbon spills from vehicles and construction equipment. Potential spills from used and stored chemicals.	Uncontrolled release	Soil quality	Yes - if unplanned event occurs	Construction Operation Decommissioning	No significant uncertainties or assumptions

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Implementation of appropriate fuel and chemicals storage and handling procedures in accordance with relevant standards and guidelines, including AS 1940, EPA guideline 080/16 Bunding and Spill Management and the Australian Dangerous Goods Code (ADG). • Refuelling of vehicles will occur at service stations or other designated third-party off-site refuelling locations. • Personnel trained in correct procedures for storage and use of any on-site chemicals (including spill response). • Appropriate spill response equipment is available on site during staffed operations. • Spills or leaks are immediately reported (both internally and to State regulators as required) and clean up actions initiated. • Any contaminated materials generated in response to clean up of a minor spill or leak will be appropriately disposed off-site at an EPA licensed facility. • No bulk fuel or liquid chemical storage (greater than 200L) stored on site during construction or maintenance activities. • No bulk fuel or chemical storage during unstaffed operation.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are small scale and require limited quantities of fuel, oil and chemicals. Design and engineering controls, and management system controls are put in place to avoid spills of fuel or chemicals. If a spill occurred, impact would be localised and short term. Sensitivity of the receiving environment is moderate, given existing agricultural land use. Potential cumulative effects of spills on soil and land quality depends on scope of other projects in the Permit Area but generally expected to be low as there are limited activities involving fuel and chemical handling within the Permit Area and no other proposed activities known. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5-2) If an unplanned event (spill resulting in soil contamination) occurs, the impact could be **minor**, however this is **unlikely**. This represents a **low** level of risk (refer to Table 5-4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No significant changes in soil stability, structure or composition resulting from activities.	Records of audits / inspections carried out in accordance with the OMP demonstrate that any escape of chemical, fuel or oil to land is either immediately contained and removed or assessed in accordance with NEPM guidelines and remediated in a timely manner in line with relevant guidelines.	Fuel and chemicals are stored and handled in accordance with relevant standards and guidelines, including AS 1940, EPA guideline 080/16 Bunding and Spill Management and the Australian Dangerous Goods Code (ADG). Inspections demonstrate no evidence of soil contamination as a result of regulated activities.

Soil and land quality: Impact ID #SOI02						
Impact Event	Vegetation clearance, earthworks and use of roads and tracks result in soil inversion, compaction or erosion and in reduced land quality					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Vegetation clearance and earthworks for meteorological mast installation and construction of temporary access track or laydowns	Direct disturbance	Landform Users of Land Vegetation	Yes - potential for limited/small-scale soil impacts	Construction Operation Decommissioning	• Topography and soil type at met mast location • Siting may reduce SPR linkage

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Existing roads or tracks are used for access where possible, expected to only require three (3) new access tracks <1km long from existing roads to the met mast location. • Landowner consulted regarding land-disturbing activities to minimise potential for surface disturbance and facilitate rehabilitation (where required). • Wet weather operations are undertaken in consultation with the landowner to prevent property track damage. • Access tracks aligned to avoid steep slopes, use naturally clear areas and avoid clearance of native vegetation, particularly longer-lived shrubs and trees. • Area of excavation is restricted to the smallest practicable. • Rehabilitation of land disturbance to be approved by the landowner or in accordance with landowner's wishes should retention of specific parts of the site be requested (e.g. pad or access track). • Restoration of land disturbance to be undertaken through consultation with, and to the satisfaction of the landowner and DEM. Should retention of specific parts of the site be requested (e.g. pad or access track) by the landowner, relevant regulatory approvals will be obtained prior to the transfer of infrastructure.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event due to factors such as extreme weather.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are small scale and require limited vegetation (e.g. crop or stubble) clearance and earthworks. Design and engineering controls, and management system controls are put in place to avoid soil degradation and facilitate rehabilitation. If soils are affected by the proposed activities, impacts would be localised and short term. Sensitivity of the receiving environment is relatively low, given the broadacre agricultural land use which regularly involves soil-disturbing activities. Potential cumulative effects on soil quantity and quality generally expected to be low given the existing land use, limited infrastructure development within the Permit Area and absence of other known other proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5-2) If an unplanned event (extreme weather event resulting in soil erosion), the impact could be **minor**, however this is **unlikely**. This represents a **low** level of risk (refer to Table 5-4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No significant changes in soil stability, structure or composition resulting from activities	Records of audits / inspections carried out in accordance with the OMP demonstrate no evidence of significant soil disturbance (e.g. erosion, wheel ruts, heavily compacted areas, soil inversion), or where these occur, they are remediated in consultation with the landholder. Records demonstrate no reasonable complaints received about soil disturbance are left unresolved.	Inspections indicate that the extent of soil erosion in areas where activities have been undertaken is consistent with or less than surrounding land.
	Rehabilitate land adversely affected by authorised operations	Records of audits / inspections demonstrate that land has been rehabilitated in accordance with Land Access Agreements, including removal of surface structures and the re-contouring of the ground surface consistent with pre-existing contours (unless alternative agreement is reached with the regulator and landowner). Records demonstrate no reasonable stakeholder complaints regarding rehabilitation of land are left unresolved.	Inspections demonstrate no evidence of soil degradation as a result of activities. Restoration of land disturbance to be undertaken through consultation with, and to the satisfaction of the landowner and DEM. Should retention of specific parts of the site be requested (e.g. pad or access track) by the landowner, relevant regulatory approvals will be obtained prior to the transfer of infrastructure. Final decommissioning and rehabilitation activities to be undertaken in accordance with a decommissioning plan approved by DEM.

Soil and land quality: Impact ID #SOI03						
Impact Event	Inappropriate waste management results in localised soil contamination					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Generated wastes (solid and liquid)	Uncontrolled release	Soil quality	Yes – if unplanned event occurs	Construction Operation Decommissioning	No significant uncertainties or assumptions

Control measures	Uncertainties regarding likely effectiveness of control strategies
• EPA's Waste Hierarchy model (avoid, reduce, reuse, recycle, recover, treat, dispose) complied with and waste management undertaken with regard to the Environment Protection (Waste to Resources) Policy 2010. • Waste streams segregated on site where practicable to maximise opportunities for waste recovery, reuse and recycling. • Waste removed off-site and disposed of at appropriately licensed waste handling facility. • Liquid wastes stored in accordance with relevant standards and guidelines, including AS 1940, EPA guideline 080/16 Bunding and Spill Management and the Australian Dangerous Goods Code (ADG). • No waste to be stored on site during unstaffed operations. • Any intermittent maintenance activity required during operations will remove any generated wastes at the end of the activity, or at the end of each week (whatever occurs earlier). • High standards of 'housekeeping' implemented. • Secure systems used for collection, storage and transport of waste. • Hazardous wastes (if generated) handled in accordance with relevant legislation and standards. • Licensed contractors used for waste transport.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are small scale and produce limited quantities of waste during construction and decommissioning. Management system measures are put in place to ensure waste are handled appropriately. If a release occurred, impact would be localised and short term. Sensitivity of the receiving environment is moderate, given the broadacre agricultural land use. Potential cumulative effects of a waste release on soil and land quality depends on scope of other projects in the Permit Area but generally expected to be low as there are limited activities involving waste handling within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5 2). If an unplanned event (inappropriate waste management resulting in soil contamination) occurs, the impact could be **minor**, however this is **unlikely**. This represents a **low** level of risk (refer to Table 5 4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	Optimise (in order of most to least preferable) onsite waste management: avoidance; reduction; reuse; recycling; treatment; and disposal.	Records of audits / inspections carried out in accordance with the OMP demonstrate that wastes have been segregated and transported to an EPA licensed waste disposal facility for recycling or disposal.	Records/inspections demonstrate waste has been securely contained prior to removal from site. Waste management is undertaken in accordance with the EPA's Waste Hierarchy model, the *Environment Protection (Waste to Resources) Policy 2010*.
	Rehabilitate land adversely affected by authorised operations.	Records of audits / inspections demonstrate that all waste has been removed from site following completion of activities unless alternative agreement is reached with the regulator and landowner. Records demonstrate no reasonable stakeholder complaints regarding rehabilitation of land are left unresolved.	Inspections demonstrate no evidence of soil contamination or waste remaining as a result of activities. Final decommissioning and rehabilitation activities (including management of any wastes) to be undertaken in accordance with a decommissioning plan approved by DEM.

5.3.2 Surface water

Setting the context

Table 5-7 summarises legislation and non-legislated standards, view of affected parties and lists the key environmental receptors relevant to surface water.

Table 5-7: Context summary for surface water

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Environment Protection Act 1993 Environment Protection (Water Quality) Policy 2015 *Landscape (South Australia) Act 2019*	Stormwater Pollution Prevention – Code of Practice for the Building and construction industry (EPA, 1999) Guideline EPA 080/16 Bunding and Spill Management AS 1940 - The storage and handling of flammable and combustible liquids Australian Dangerous Goods Code National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) Guideline for stockpile management (updated Oct 2020)	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. No specific issues raised from DEM led consultation (Jun – Aug 2025) relating to this environmental element.	Surface water users Surface water

Environmental impact and significance assessment

Potential impact events relevant to surface water were assessed and determined to not have a S-P-R linkage (refer Table 5-5). Consequently, they have not been carried further through the impact assessment process.

5.3.3 Groundwater

Setting the context

Table 5-8 summarises legislation and non-legislated standards, view of affected parties and lists the key environmental receptors relevant to groundwater.

Table 5-8: Context summary for groundwater

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Environment Protection Act 1993 Environment Protection (Water Quality) Policy 2015	Stormwater Pollution Prevention – Code of Practice for the Building and construction industry (EPA, 1999) Guideline EPA 080/16 Bunding and Spill Management AS 1940 - The storage and handling of flammable and combustible liquids Australian Dangerous Goods Code National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) Guideline for stockpile management (updated Oct 2020)	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. No specific issues raised from DEM led consultation (Jun – Aug 2025) relating to this environmental element.	Groundwater Groundwater users

Environmental impact and significance assessment

Potential impact events relevant to groundwater were assessed and determined to not have a S-P-R linkage (refer Table 5-5). Consequently, they have not been carried further through the impact assessment process.

5.3.4 Flora, fauna and biodiversity

Setting the context

Table 5-9: summarises legislation and non-legislated standards, view of affected parties and lists the key environmental receptors relevant to flora, fauna and biodiversity.

Table 5-9: Context summary for flora, fauna and biodiversity

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Native Vegetation Act 1991 *National Parks and Wildlife Act 1972* *Landscape South Australia Act 2019* *Fire and Emergency Services Act 2005* Environment Protection (Commercial and Industrial Noise) Policy 2023 South Australia's Biosecurity Policy 2020-2023 Controlled Substances (Pesticides) Regulations 2017 *Environment Protection and Biodiversity Conservation Act 1999* (Cth) *Biodiversity Act 2025 (once commenced)*	National Light Pollution Guidelines for Wildlife Australian Weeds Strategy 2017-2027 (Commonwealth of Australia, 2017) AS1940-2004 The storage and handling of flammable and combustible liquids APPEA Code of Environmental Practice	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. Confirmation that the appropriate professionals will be utilised to undertake in-field ecological surveys, and that species and habitats not found in initial desktop database searches will be covered by the SEO & EIR controls. Clearance permits will be supported by appropriate assessments and obtained if native vegetation requires clearing.	Native flora and fauna Threatened flora Threatened and migratory fauna

Impact events

The impact events relevant to flora, fauna and biodiversity are:

- Incidental clearance or disturbance of native vegetation results in a loss of native vegetation and habitat
- Introduction and spread of weed(s), pest(s) and/or pathogen(s) alter existing vegetation structure and composition, and outcompete native vegetation
- Direct mortality of fauna as a result of collision with vehicles and infrastructure
- The activities interfere with listed threatened or migratory fauna species, resulting in reduced abundance.

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Potential impacts from the proposed activities are localised and small scale and readily manageable using standard control measures. Events such as incidental clearance of native vegetation and fauna mortality are unlikely to occur due to the micro-siting of infrastructure and control measures to be implemented.

Evaluation of unplanned events (human error resulting in native vegetation clearance outside any approved areas, or fauna collision with vehicles or infrastructure) has indicated that the level of risk from unplanned events is **low**.

Environmental impact and significance assessment

The following tables detail the impact assessment for of the identified impact events.

Flora, fauna and biodiversity: Impact ID #BIO01						
Impact Event	Incidental clearance or disturbance of native vegetation results in a loss of native vegetation and habitat.					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Vegetation clearance for meteorological mast installation and construction of temporary access track or laydowns	Direct disturbance	Native flora and fauna including threatened flora	Potential – siting is expected to remove SPR linkage	Construction Operation Decommissioning	Occurrence of significant and/or threatened flora (occurs where not detected / predicted) Location of met mast (siting is expected to remove SPR linkage)

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Undertake ecological assessment prior to work and identify any areas of sensitivity or "no-go" areas or inform native vegetation clearance application (if required). • Areas of vegetation associations or plant species of conservation significance will be identified by suitably qualified ecologist and will not be disturbed, removed or traversed by vehicles. • During met mast operation, presence of birds and nests will be inspected during maintenance works and site inspections and this requirement will be incorporated into the OMP. • Intact or significant native vegetation will be avoided. • Any native vegetation clearance avoided if existing cleared areas can be utilised or clearance limited to minimum required. • Where unavoidable native vegetation clearance is required, prior approval under the Native Vegetation Act is obtained. • Any areas of clearance will be rehabilitated where necessary.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Proposed activities are small scale and siting will not require significant vegetation clearance or disturbance. In the unlikely event that clearance is required (e.g. regrowth of colonising native species in paddocks that have not been recently ploughed) this will only be undertaken where any required native vegetation approval has been granted. Design and engineering controls, and management system controls are put in place to avoid clearance and disturbance of native vegetation and biodiversity.	Expected impact: **Negligible** (refer to Table 5-2) If an unplanned event (human error resulting in native vegetation clearance outside any approved areas) occurs, the impact could be **minor**, however this is

Environmental significance assessment	Environmental significance assessment outcome
Sensitivity of the receiving environment is relatively low given the agricultural nature of the proposed met mast locations (noting that higher sensitivity areas will be avoided). Potential cumulative effects of native vegetation clearance depend on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities. Controls in place manage impacts to ALARP by prioritising avoidance and where unavoidable, approvals required from DEW, offset contributions made (on-ground or payment to the fund), and site rehabilitated as required.	**unlikely**. This represents a **low** level of risk (refer to Table 5-4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No loss of abundance or diversity of native vegetation and/or fauna unless prior approval under the relevant legislation is obtained	All biodiversity data collected by an appropriately qualified professional and reported to the Biological Databases of South Australia and DEM, pursuant to HRE Regulation 32(2)(c). Records demonstrate that necessary approvals for vegetation clearance under the Native Vegetation Act have been obtained and 'significant environmental benefit' obligation has been satisfied. Records of audits/inspections (e.g. ecological assessments) demonstrate no listed threatened flora species removed (unless appropriate approval has been obtained). Records of audits/inspections carried out in accordance with the OMP demonstrate there has been no unauthorised clearing of native vegetation.	Prior to undertaking activities, appropriately trained and experienced personnel have assessed or scouted proposed project area and have identified and flagged significant (or rare, vulnerable or endangered) species and communities. Visual inspections are undertaken to ensure that project areas are appropriately rehabilitated. (Refer also to Objective 9) Demonstration that the mitigation hierarchy has been followed.

Flora, fauna and biodiversity: Impact ID #BIO02						
Impact Event	Introduction and spread of weed(s), pest(s) and/or pathogen(s) alter existing vegetation structure and composition, and outcompete native vegetation					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**Uncertainties and assumptions**
	Weed / pathogen introduction and spread	Vehicle, equipment and workers movement	Native vegetation	Potential (if unplanned event occurs) however siting is expected to remove SPR linkage	Construction Operation Decommissioning	Weed presence at time of construction

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Appropriate consultation regarding weeds, pathogens and pests is carried out with landowners and PIRSA / DEW / Landscape Board (where relevant). • Environmental assessment undertaken during the planning stage to identify specific issues. • Management procedures in place to prevent the spread of identified weeds / diseases / pathogens, including limiting off road/track driving to only when necessary. • Notification of authorities (e.g. Landscape Board) on identification of WoNS in accordance with Landscape SA Act requirements. • Education of staff to identify WoNS in inductions. • Include in Operational Management Plan appropriate weed management and control strategies (Weed Management Plan) • Biosecurity measures in line with Land Access Agreement and Land Access Protocols	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event (introduction or spread of weeds) due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Proposed activities are small scale and involve limited vehicle movement and equipment. Siting will not require significant native vegetation clearance or disturbance which minimises the potential for weed introduction or spread in native vegetation. Management system measures are put in place to prevent the introduction of any weed, pest and pathogens at the survey location. If weeds and/or pathogens are introduced, impacts would localised and with control measures implemented, would generally be short term (however longer term impacts are possible). Sensitivity of the receiving environment is moderate as native vegetation could be affected by introduction or spread of weeds (however it is not likely that intact or significant native vegetation would be impacted by the activities or weed introduction/spread if it occurs).	Expected impact: **Negligible** (refer to Table 5 2) If an unplanned event (introduction or spread of weeds) occurs, the impact could be **minor**, however this is **unlikely**. This represents a **low** level of risk (refer to Table 5 4).

Potential cumulative effects of the spread of weeds and pests depend on scope of other projects in the Permit Area but generally expected to be low as there limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No introduction or spread of weeds, pest animals and pathogens as a consequence of the activities.	Records of audits/inspections carried out in accordance with the OMP demonstrate that the presence of weeds, pest animals or pathogens is consistent with or better than pre-disturbance conditions and adjacent land or where this is not the case, a management plan is implemented promptly. Declared plants occurring within/adjacent to operational areas are reported and managed in accordance with relevant legislation and Regional Landscape Plan.	Where introduced weeds are detected on the work site/area of operation, records demonstrate that weed management activities are undertaken in accordance with Weed Management Procedures. Records demonstrate that where deemed as required vehicle and equipment inspections and cleaning has been undertaken prior to mobilisation to site

Flora, fauna and biodiversity: Impact ID #BIO03						
Impact Event	Direct mortality of fauna as a result of collision with vehicles and infrastructure					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Collision with vehicles during construction. Collision with meteorological masts	Vehicle movements, direct disturbance from masts	Native fauna including avifauna	Yes – if unplanned event occurs	Construction Operation Decommissioning	• Occurrence and abundance of fauna at or near met mast location

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Existing access roads and turn-arounds used where possible. • Traffic and journey management procedures followed. • Significant areas for native fauna (including but not limited to nesting areas for water birds) are identified during the planning process and are avoided, either spatially or temporally. • Excavations (e.g. foundations for meteorological masts) are kept open for the minimum amount of time and are regularly checked for trapped fauna. • Activities restricted to daytime hours and avoid travel at night where possible. • Painting the top third of the mast in alternating contrasting bands of colour • Marker balls , high visibility flags or other surface finish to increase the visibility of the mast • Marker balls or high visibility flags / sleeves placed on outside guy wires (minimum upper third, as recommended by CASA) • Ensuring guy wire ground attachment points have contrasting colours to the surrounding ground/ vegetation • Low intensity steady hazard/warning obstacle light (as recommended by CASA)	Moderate to high certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event (fauna collision) to occur.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Proposed activities are small scale and require limited vehicle movements, at a small number of meteorological mast locations. Management system measures are put in place to ensure there are no direct mortality of fauna due to activities. Sensitivity of the receiving environment is relatively low given the agricultural nature of the proposed met mast locations (noting that higher sensitivity areas will be avoided). Potential cumulative effects of fauna mortality from project activities depend on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5-2) If an unplanned event (fauna collision resulting in mortality) occurs, the impact could be **minor**, however this is **unlikely**. This represents a **low** level of risk (refer to Table 5-4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No loss of abundance or diversity of native vegetation and/or fauna unless prior approval under the relevant legislation is obtained.	Records of audits/inspections carried out in accordance with the OMP demonstrate there are no native fauna casualties that could have reasonably been prevented through the management measures described in the EIR.	Fauna casualties recorded and investigated to assess the effectiveness of the controls in place to prevent occurrences.

Flora, fauna and biodiversity: Impact ID #BIO04						
Impact Event	The activities interfere with listed threatened or migratory fauna species, resulting in reduced abundance					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Construction, operation noise. Pest animals. Collision with masts. Vehicles.	Noise and Vibration. Competition, predation. Direct disturbance. Vehicle movements.	Threatened / migratory fauna	Unknown – siting may remove SPR linkage	Construction Operation Decommissioning	• Occurrence of threatened or migratory fauna at or near the met mast location • Siting may remove SPR linkage

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Areas of habitat important to threatened or migratory fauna species will be identified and avoided. • If habitat with significant conservation value is present in the vicinity of survey activities, it will be flagged and / or fenced off where necessary to prevent disturbance. • The conservation needs of species will be considered and appropriate management strategies implemented where necessary.	High certainty that proposed control measures will be effective.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Proposed activities are small scale and siting will avoid habitat of importance to threatened or migratory species. Design and engineering controls are put in place to avoid threatened and migratory species and their habitats as much as reasonably practicable. Sensitivity of the receiving environment is relatively low given the agricultural nature of the proposed met mast locations (noting that higher sensitivity areas will be avoided). Activities restricted to daytime hours and avoid travel at night where possible. Potential cumulative effects of impacts to threatened and migratory species depend on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities. Controls in place manage impacts to ALARP by prioritising avoidance and development of additional management strategies where necessary.	Expected impact: **Negligible** (refer to Table 5-2)

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No significant impacts to threatened or migratory fauna	Records of audits/inspections carried out in accordance with the OMP (e.g. ecological assessments and clearance data) demonstrate significant habitat for listed threatened or migratory species has been avoided.	Any sites of rare, vulnerable or endangered species or threatened communities have been identified, flagged (where appropriate) and subsequently avoided.

5.3.5 Air quality

Setting the context

Table 5-10 summarises legislation and non-legislated standards, view of affected parties and lists the key environmental receptors relevant to air quality

Table 5-10: Context summary for air quality

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Environment Protection Act 1993 Environment Protection (Air Quality) Policy 2016 *Climate Change and Greenhouse Gas Emissions Reduction Act 2007* *National Greenhouse and Energy Reporting Act 2007*	National Environment Protection (Ambient Air Quality) Measure 2021 National Environment Protection (Diesel Vehicle Emissions) Measure 2001 National Environment Protection (Air Toxics) Measure 2004 Guideline for stockpile management (updated Oct 2020)	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. No specific issues raised from DEM led consultation (Jun – Aug 2025) relating to this environmental element.	Local community Visitors Fauna Stock

Impact events

- Dust generated during construction activities results in a deterioration of air quality at sensitive receptors

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Potential impacts from the proposed activities are localised, small scale and short term, and readily manageable using standard control measures.

Environmental impact and significance assessment

The following tables detail the impact assessment for of the identified impact events.

Air Quality: Impact ID #AIR01						
Impact Event	Dust generated during construction activities results in a deterioration of air quality at sensitive receptors					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Generation of dust during: Meteorological masts installation Use of temporary access tracks, unsealed roads	Airborne dust deposition	Local community Visitors Fauna including livestock	Yes	Construction Decommissioning	Proximity to residences (siting could potentially remove SPR)

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Dust control measures (e.g. water spraying) implemented if dust generation becomes a problem (e.g. near sensitive receptors). • Vehicles are driven at speeds slow enough to minimise generation of dust, in line with traffic and journey procedures. • Dust generating activities to be scheduled to avoid adverse weather conditions (e.g. periods of high winds). • The extent of new exposed and stripped surface area is minimised. • Cleared areas and soil stockpiled are managed through stabilisation, light watering or covers during dry conditions, as required. • System is in place for ongoing landholder communication, and logging landowner complaints to ensure that and identified amenity issues are recorded, addressed as appropriate and complaints are resolved in a timely manner.	Moderate to high certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Proposed activities are small scale and involve limited and short-term dust generating construction activities. Management system measures are put in place to reduce dust generation to as low as reasonably practicable. If a dust generation occurs above ambient levels, impacts would be localised and short term. Sensitivity of the receiving environment is relatively low, given the proposed distance from residences and the existing agricultural land use (which regularly involves soil-disturbing activities). Potential cumulative effects of dust generation during construction depend on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities.	Expected impact: **Negligible** (refer to Table 5-2)

Environmental significance assessment	Environmental significance assessment outcome
Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	Minimise disturbance to stakeholders, land use and associated infrastructure.	Records demonstrate that no reasonable complaints received about air quality are left unresolved.	Where potentially sensitive sites and/or dust generating activities or weather conditions are identified, dust suppression equipment (e.g. water carts or sprays) is made available onsite and deployed in the event dust generation becomes a problem.

5.3.6 Noise and vibration

Setting the context

Table 5-11 summarises legislation and non-legislated standards, views of affected parties and lists the key environmental receptors relevant to noise and vibration.

Table 5-11: Context summary for noise and vibration

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Environment Protection Act 1993 *Local Nuisance and Litter Control Act 2016*	Environment Protection (Commercial and Industrial Noise) Policy 2023 EPA guideline 425/23 Construction noise	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. No specific issues raised from DEM led consultation (Jun – Aug 2025) relating to this environmental element.	Local community Visitors

Impact events

The impact events relevant to noise and vibration are:

- Noise and vibration generated by the activities reduce local amenity.

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Potential impacts from the proposed activities are localised and small scale and readily manageable using standard control measures. Events such as excessive noise and vibration are unlikely to occur due to the limited and short-term construction activities and control measures to be implemented.

Environmental impact and significance assessment

The following tables detail the impact assessment for of the identified impact events.

Noise and vibration: Impact ID #NOI01						
Impact Event	Noise and vibration generated by the activities reduce local amenity.					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Generation of noise and vibration during: Meteorological masts installation and deinstallation Construction of laydowns or access	Noise and vibration	Local community Visitors	Yes	Construction Decommissioning	Proximity of activities to sensitive receptors

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Generation of noise during construction and operation is consistent with the EPA 425/23 Construction Noise Information Sheet (EPA, 2023) and the Environment Protection (Commercial and Industrial Noise) Policy 2023. • Location of sensitive receptors (e.g. residences) considered when planning activities, and avoidance or mitigation measures implemented where required. • Equipment operated and maintained in accordance with manufacturer specifications. • Vehicles and equipment are turned off when not in use, if likely to result in noise impact. • Activities restricted to daytime hours and avoid travel at night where possible. • System is in place for logging landowner complaints to ensure that any noise amenity issues are recorded, addressed as appropriate and complaints are resolved in a timely manner.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Noise generating activities are occasional and short-term in nature (during construction and decommissioning). Management system measures are put in place to reduce noise levels to as low as reasonably practicable.	Expected impact: **Negligible** (refer to Table 5 2).

Environmental significance assessment	Environmental significance assessment outcome
Sensitivity of the receiving environment is low to moderate, given the proposed distance from residences and the existing agricultural land use (which occasionally involves noise-generating activities). If excessive noise (above ambient) occurs, impact would be localised and short term. Potential cumulative effects of noise on local community depends on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	Minimise disturbance to stakeholders, land use and associated infrastructure.	Records demonstrate that no reasonable complaints received about noise levels are left unresolved	Compliance with the *Environment Protection (Commercial and Industrial Noise) Policy 2023.*

5.3.7 Landscape and visual amenity

Setting the context

Table 5-12 summarises legislation and non-legislated standards, views of affected parties and lists the key environmental receptors relevant to landscape and visual amenity.

Table 5-12: Context summary for landscape and visual amenity

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
n/a	n/a	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. PIRSA requested consideration/clarity that visitors include tourists to the region visiting conservation areas.	Local community Visitors to the region

Impact events

The potential impact events relevant to landscape and visual amenity are:

- Equipment used during construction and decommissioning activities (e.g. cranes) interfere with the visual landscape and amenity for sensitive receptors
- Met mast structure interferes with the visual landscape and amenity for residents, local communities and visitors to the region.

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Potential impacts from the proposed activities are temporary and small scale and readily manageable using standard control measures, including incorporation of minimum buffer distances to potential sensitive receptors. Visual impacts due to construction and decommissioning activities are unlikely due to their limited and short-term nature. Visual impacts during operation and use of met masts are also temporary in nature, as they are expected to be in place for the term of the licence and removed once data collection activities are complete.

Environmental impact and significance assessment

The following tables detail the impact assessment for of the identified impact events.

Visual: Impact ID #VIS01						
Impact Event	Activities result in reduced visual amenity for the local community and/or visitors to the region.					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Visible structure including meteorological masts	Line of Sight	Local community Visitors to the region	Potential (siting is expected to remove SPR linkage)	Construction Operation Decommissioning	Proximity of activities to sensitive receptors, including main roads and residences (siting could potentially remove SPR)

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Location of sensitive receptors (e.g. residences) considered when planning activities, and avoidance measures including minimum buffer distances to residential buildings, public roads and heritage sites implemented during the design phase. • If a met mast is planned to be constructed in land adjacent to a conservation area (e.g. Moody Tanks Nature Reserve), a minimum setback of 500m will be required. • Continued implementation of Stakeholder Engagement Strategy and Plans relating to the Project, including the notification of landowners, local Council and other potentially interested parties of the planned dates of construction, operation and decommissioning/dismantling. • System is in place for logging any complaints or queries to ensure that any amenity issues are recorded, addressed as appropriate and complaints are resolved in a timely manner.	High certainty that proposed control measures will be effective.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Construction and decommissioning activities are short-term in nature, and the met mast is a temporary structure that is expected to remain in place for the term of the licence – any potential visual amenity impacts to sensitive receptors are therefore finite in nature. Sensitivity of the receiving environment is low, given the inclusion of minimum buffers from residences (1000m), public roads (100m) and conservation zoned land (500m) to avoid placement of met masts in areas which would significantly reduce visual amenity to residents, the local Community and visitors. A maximum of three (3) met masts are proposed to be constructed across the entire Permit area Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5 2).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	Minimise disturbance to stakeholders, land use and associated infrastructure.	Records demonstrate that appropriate stakeholders (landowners, neighbours, local Council) are consulted and advised in line with Stakeholder Engagement Strategy and Plans prior to survey, construction and decommissioning/rehabilitation activities. Landowner/stakeholder complaints are documented, and reasonable steps taken to resolve them can be demonstrated.	Compliance with minimum buffer distances to identified potential receptors.

5.3.8 Aboriginal and non-Aboriginal heritage

Setting the context

Table 5-13 summarises legislation and non-legislated standards, views of affected parties and lists the key environmental receptors relevant to Aboriginal and non-Aboriginal heritage.

Table 5-13: Context summary for Aboriginal heritage and non-Aboriginal heritage

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Aboriginal Heritage Act 1988 *Aboriginal and Torres Strait Islander Act 2005* *Native Title Act 1993* *Coroners Act 2003.*	n/a	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. BDAC has advised that a separate Heritage Agreement will be required to ensure that confidentiality requirements regarding Aboriginal heritage are adequately covered addressed. Refer to Appendix A.	Aboriginal sites, objects and remains Traditional owners
Heritage Places Act 1993	n/a	Final update post-DEM led consultation	Heritage values Community

Impact events

The impact events relevant to Aboriginal and non-Aboriginal heritage are:

- Activities result in damage or loss of known and unknown Aboriginal heritage sites, objects or remains
- Activities result in damage or loss of known and unknown non-Aboriginal heritage places or artefacts

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Potential impacts from the proposed activities are localised and small scale and readily manageable using standard control measures. Events such as damage or loss to heritage are unlikely to occur due to the siting of infrastructure and control measures to be implemented.

Evaluation of unplanned events (damage, disturbance, interference or loss of undetected Aboriginal heritage sites, objects or remains) has indicated that the level of risk is **low**.

Environmental impact and significance assessment

The following tables detail the impact assessment for of the identified impact events.

Aboriginal and non-Aboriginal Heritage: Impact ID #HER01						
Impact Event	Activities result in damage, disturbance, interference or loss of known and unknown Aboriginal heritage sites, objects or remains					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Vegetation clearance and earthworks for meteorological mast installation and construction of temporary access track or laydowns	Disturbance	Traditional owners Aboriginal heritage and communities	Yes - if unplanned event occurs	Construction Decommissioning	Occurrence of Aboriginal sites, objects or remains not detected in pre-construction assessment.

Control measures	**Uncertainties regarding likely effectiveness of control strategies**
• Ensure AGD-AAR database search is conducted and the area for construction is clear of any known/registers sites, objects or artefacts. • Infrastructure and ground disturbing activities sited in already disturbed areas. • Where access agreed with the landowner, undertake a Cultural Heritage survey prior to proposed works to ensure any potential new, unregistered sites not recorded on the AGD-AAR database are appropriately identified. • Where access agreed with the landowner, appropriate Cultural Heritage monitors are present for any land clearing/ground disturbance during met mast construction. • Engage with BDAC in line with Consultation Plan. • Develop and implement a Cultural Heritage Management Plan in consultation with BDAC. • Procedures consistent with the relevant obligations under the *Aboriginal Heritage Act 1988* are in place to appropriately report and respond to any areas of significance discovered during activities. • Any Aboriginal heritage sites, objects and remains discovered during operations are appropriately reported and responded to, consistent with the *Aboriginal Heritage Act 1988* and the *Coroners Act 2003*. • Known heritage sites are identified and protected from operations. Where necessary and appropriate, cultural heritage sites or exclusion zones in the vicinity of the activities are flagged and / or fenced off to prevent disturbance, in line with the CHMP. • Proponents and their contractors have a suitable reporting system in place for cultural sites discovered during activities, in line with the CHMP.	High certainty that proposed control measures will be effective. Limited potential for unplanned event due to possible presence of undetected sites, objects or remains.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are small scale and require nil or limited vegetation clearance and earthworks. Design and engineering controls, and management system controls are put in place to avoid disturbance to Aboriginal heritage. Sensitivity of the receiving environment is generally low given the highly modified and agricultural nature of the Permit Area. Site specific Aboriginal heritage assessments are required to further define the sensitivity for the siting of the met masts. Potential cumulative effects of disturbance to Aboriginal heritage depends on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5 2) If an unplanned event (disturbance to undetected Aboriginal heritage) occurs, the impact could be **moderate**, however the likelihood of this is **rare**. This represents a **low** level of risk (refer to Table 5 4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No damage, disturbance or interference to Aboriginal and non-Aboriginal heritage sites, objects, remains and places unless it is authorised under the relevant legislation.	Records of audits/inspections carried out in accordance with the OMP demonstrate no damage, disturbance or interference to any Aboriginal sites, objects and remains (all as defined under the *Aboriginal Heritage Act 1988*) unless authorisation has been obtained under the *Aboriginal Heritage Act 1988*.	In the event the conditions of a cultural heritage assessment or work area clearance(s) are not complied with, the incident is appropriately reported, investigated and remediated in consultation with the relevant Traditional Owners.

Aboriginal and non-Aboriginal Heritage: Impact ID #HER02						
Impact Event	The activities result in damage or loss of known and unknown non-Aboriginal heritage places or artefacts					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Vegetation clearance and earthworks for meteorological mast installation and construction of temporary access track or laydowns	Disturbance	Heritage values and community	Unknown – siting may remove SPR linkage	Construction Decommissioning	Location of met mast (siting may remove SPR linkage)

Control measures	Uncertainties regarding likely effectiveness of control strategies
• No impact to heritage places and related objects protected under the Heritage Places Act 1993 unless approval has been obtained under the Act. • Heritage site registers (and Heritage Branch, DEW, where appropriate) are consulted regarding the location of heritage sites and any identified sites are avoided. • Any heritage sites or objects discovered during operations have been appropriately reported and responded to, consistent with the requirements of the Heritage Places Act 1993. • Known heritage sites are identified and protected from operations. Where necessary, cultural heritage sites or exclusion zones in the vicinity of the activities are flagged and / or fenced off to prevent disturbance. • Proponents and their contractors have a reporting system in place for heritage sites discovered during activities.	High certainty that proposed control measures will be effective.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are small scale and will avoid non-Aboriginal heritage sites. Design and engineering controls, and management system controls are put in place to avoid disturbance to non-Aboriginal heritage. Sensitivity of the receiving environment is low given the highly modified and agricultural nature of the Permit Area. Site specific heritage review is required to further define the sensitivity for the siting of the met masts. Potential cumulative effects are low given the avoidance measures that are in place. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5 2)

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No damage, disturbance or interference to Aboriginal and non-Aboriginal heritage sites, objects, remains and places unless it is authorised under the relevant legislation.	Records of audits / inspections carried out in accordance with the OMP demonstrate no impact to non-Aboriginal heritage places and related objects protected under the *Heritage Places Act 1993* unless approval has been obtained under the *Heritage Places Act 1993*.	Records demonstrate that heritage site registers (and Heritage Branch, DEW, where appropriate) have been consulted regarding the location of non-Aboriginal heritage sites and any identified sites have been avoided.

5.3.9 Social environment, land use and infrastructure

Setting the context

Table 5-14 summarises legislation and non-legislated standards, views of affected parties and lists the key environmental receptors relevant to social environment, land use and infrastructure.

Table 5-14: Context summary for social environment, land use and infrastructure

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Landscape South Australia Act 2019 *Biosecurity Act 2015* (Cth) *Livestock Act 1997*	Guideline EPA 080/16 Bunding and Spill Management AS 1940 - The storage and handling of flammable and combustible liquids Australian Dangerous Goods Code National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013)	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. PIRSA indicated a clearer reference to biosecurity risks is required, and consideration/reference to the *Livestock Act 1997.*	Third party users Landowners Livestock

Impact events

The impact events relevant to social environment, land use and infrastructure are:

- The activities disturb landowner infrastructure or activities
- Introduction and spread of weed(s), pest(s) and/or pathogen(s) impacts to land use or to livestock on the land

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Potential impacts from the proposed activities are localised and small scale and readily manageable using standard control measures. Events such as disturbance to landowner infrastructure and introduction of weeds and pests are unlikely to occur due to the control measures to be implemented.

Evaluation of unplanned events (exceedance of agreed disturbance or introduction of weeds and pests) has indicated that the level of risk from unplanned events is **low**.

Environmental impact and significance assessment

The following tables detail the impact assessment for of the identified impact events.

Social Environment, Land Use and Infrastructure: Impact ID #SOC01						
Impact Event	The activities disturb landowner infrastructure or activities					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Operational activities including vehicle/worker movements and earthwork	Direct disturbance	Landowners	Yes	Construction, Operation Decommissioning	Infrastructure location Timing of activities

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Land Access Agreement and Land Access Protocols in place to manage aspects such as: • Sites/routes are selected to minimise potential impacts to landowners and land use activities. Activities restricted to daytime hours and avoiding periods critical to the agricultural business cycle such as harvesting, lambing, unless otherwise agreed with the relevant landowner. • Leaving gates as found. • Fences are not modified without landowner permission and are restored to a level satisfactory to the landowner. • Adhering to speed limits when travelling off farm roads or paddocks • System is in place for logging landowner complaints to ensure that issues are recorded, addressed as appropriate and complaints are resolved in a timely manner. • Restoration of land disturbance to be undertaken through consultation with, and to the satisfaction of the landowner and DEM. Should retention of specific parts of the site be requested (e.g. pad or access track) by the landowner, relevant regulatory approvals will be obtained prior to the transfer of infrastructure.	High certainty that proposed control measures will be effective. Limited potential for unplanned event (exceedance of agreed disturbance) due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are short-term and small scale and require limited disturbance Management system and design control measures are put in place to ensure disturbance to landowners and local community is kept as low as reasonably practicable. If excessive disturbance occurs, impact would be localised and short term. Sensitivity of the receiving environment is low to moderate, given that agreements covering the activities will be in place.	Expected impact: **Negligible** (refer to Table 5 2) If an unplanned event (agreed disturbance is exceeded due to human error) occurs, the impact could be **minor**, however this is **unlikely**. This represents a **low** level of risk (refer to Table 5 4).

Environmental significance assessment	Environmental significance assessment outcome
Potential cumulative effects of operational activities on local community depends on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	Minimise disturbance to stakeholders, land use and associated infrastructure.	Landowner / stakeholder complaints are documented, and reasonable steps taken to resolve them can be demonstrated.	Landowners are consulted prior to survey activities, and relevant control and management measures consistent with those identified are implemented. No adverse impact (outside agreed disturbance areas) on land use as a result of activities. Adverse impacts of accidental or unforeseen damage to infrastructure or disturbance to land use resolved to the reasonable satisfaction of the landowner.
	Rehabilitate land adversely affected by authorised operations.	Records of audits / inspections demonstrate that land has been rehabilitated in accordance with Land Access Agreements, including removal of surface structures and the re-contouring of the ground surface consistent with pre-existing contours (unless alternative agreement is reached with the regulator and landowner). Records demonstrate no reasonable stakeholder complaints regarding rehabilitation of land are left unresolved.	Restoration of land disturbance to be undertaken through consultation with, and to the satisfaction of the landowner and DEM. Should retention of specific parts of the site be requested (e.g. pad or access track) by the landowner, relevant regulatory approvals will be obtained prior to the transfer of infrastructure.

Social Environment, Land Use and Infrastructure: Impact ID #SOC02						
Impact Event	Introduction and spread of weed(s), pest(s) and/or pathogen(s) impacts to land use or to livestock on the land					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**Uncertainties and assumptions**
	Weed / pathogen introduction and spread	Vehicle, equipment and workers movement	Livestock, Third-party users, Landowners	Yes	Construction Operation Decommissioning	Weed presence at time of construction

Control measures	Uncertainties regarding likely effectiveness of control strategies

• Appropriate consultation regarding weeds, pathogens and pests is carried out with landowners and PIRSA / DEW / Landscape Board (where relevant).
• Environmental assessment undertaken during the planning stage to identify specific issues.
• Management procedures in place to prevent the spread of identified weeds / diseases / pathogens, including limiting off road/track driving to only when necessary.
• Notification of authorities (e.g. Landscape Board) on identification of WoNS in accordance with Landscape SA Act requirements.
• Education of staff to identify WoNS in inductions.
• Include in Operational Management Plan appropriate weed management and control strategies (Weed Management Plan).
• Biosecurity measures in line with Land Access Agreement and Land Access Protocols including aspects such as:
  • Cleaning of equipment and vehicles before arrival to site (wash down where appropriate) and between properties where required
  • Disturbance of significant weeds, (e.g. Weeds of National Significance) is avoided unless for their control.
	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event (introduction or spread of weeds) due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Proposed activities are small scale and involve limited vehicle movement and equipment. Management system measures are put in place to prevent the introduction of any weed, pest and pathogens at the survey location. If weeds and/or pathogens are introduced, impacts would localised and with control measures implemented, would generally be short term (however longer term impacts are possible). Sensitivity of the receiving environment is moderate as existing agricultural land use could be affected by introduction or spread of weeds.	Expected impact: **Negligible** (refer to Table 5 2) If an unplanned event (introduction or spread of weeds) occurs, the impact could be **minor**, however this is **unlikely**. This represents a **low** level of risk (refer to Table 5 4).

Environmental significance assessment	Environmental significance assessment outcome
Potential cumulative effects of the spread of weeds and pests depend on scope of other projects in the Permit Area but generally expected to be low as there limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No introduction or spread of weeds, pest animals and pathogens as a consequence of the activities.	Records of audits/inspections carried out in accordance with the OMP demonstrate that the presence of weeds, pest animals or pathogens is consistent with or better than pre-disturbance conditions and adjacent land or where this is not the case, a management plan is implemented promptly. Declared plants occurring within/adjacent to operational areas are reported and managed in accordance with relevant legislation and Regional Landscape Plan.	Where introduced weeds are detected on the work site/area of operation, records demonstrate that weed management activities are undertaken in accordance with Weed Management Procedures. Records demonstrate that where deemed as required, vehicle and equipment inspections and cleaning has been undertaken prior to mobilisation to site

5.3.10 Public health and safety

Setting the context

Table 5-15 summarises legislation and non-legislated standards, views of affected parties and lists the key environmental receptors relevant to public health and safety.

Table 5-15: Context summary for public health and safety

Applicable legislation	Applicable non-legislated standards	Views of affected parties	Environmental receptors
Civil Aviation Act 1988 and *Regulations 1988* *Fire and Emergency Services Act 2005* *Public Health Act 2011* *Work Health and Safety Act 2012* *Road Traffic Act 1961*	AS1940-2004 The storage and handling of flammable and combustible liquids Advisory Circular 139.E-05v1.1 – Obstacles (including wind farms) outside the vicinity of a CASA certified aerodrome National Airports Safeguarding framework – Guideline E: Managing the risk of distractions to pilots from lighting in the vicinity of airports	No comments or issues raised by property or tenement holders during Revera led consultation (Jan-Feb 2025) relating to this environmental element. Additional detail (to be provided once known) regarding confirmed types and volumes of traffic, and noted approval requirements for oversize and overmass vehicles (though these are not envisaged as required). The requirement for an Aviation Impact Assessment by a suitably qualified professional, and confirmation that the construction is in accordance with CASA guidance. Recommendation to incorporate confirmation of setback compliance within conditions of permit.	Aircraft users Local and regional community Road users Public

Impact events

The impact events relevant to public health and safety are:

- Meteorological masts increase aviation hazard with potential for aircraft collision resulting in injuries or fatalities
- Fires caused by the activities results in injuries or fatalities to members of the public.
- Project-related traffic increases road safety risk for local residents and other road users
- The activities and associated infrastructure increase public safety hazard.

Impact assessment outcomes

The impact assessment detailed in the following tables indicated that expected impacts were generally in the **Negligible** category. Evaluation of unplanned events has indicated that the level of risk is **medium** (collisions or other incidents affecting the public are extremely unlikely to occur, however they have a high level of potential consequence and therefore a higher risk rating). These potential impacts and unplanned events are readily manageable using standard control measures proposed.

Environmental impact and significance assessment

The following tables detail the impact assessment for of the identified impact events.

Public Health and Safety: Impact ID #SAF01						
Impact Event	Meteorological masts increase aviation hazard with potential for aircraft collision resulting in injuries or fatalities.					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Meteorological mast installation	Aircraft accident	Aircraft users	Yes – if unplanned event occurs	Operation	Meteorological mast location and design Distance to aerodrome, aeroplane landing areas and airstrips Occurrence of aerial agriculture operations

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Identification of nearby aerodromes, landing areas and airstrips. • Consultation with nearby aerodrome / landing areas / airstrip owners and local pilots. • Assessment of potential issues will be undertaken to inform siting of meteorological masts. • Aeronautical (aviation) impact assessment will be undertaken for meteorological masts taller than 150 m. • Notification to relevant CASA and other Commonwealth agencies (e.g. Department of Defence, RAAF, Air Services Australia) where required prior to construction. • Registration of the meteorological masts on the RAAF Aeronautical Information Service database where required. • Painting the top third of the mast in alternating contrasting bands of colour • Marker balls , high visibility flags or other surface finish to increase the visibility of the mast • Marker balls or high visibility flags / sleeves placed on outside guy wires (minimum upper third, as recommended by CASA) • Ensuring guy wire ground attachment points have contrasting colours to the surrounding ground/ vegetation • Low intensity steady hazard/warning obstacle light (as recommended by CASA) • Certification of the met mast design by a structural engineer prior to construction, along with any relevant building certifications.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): Design and engineering controls are put in place to ensure meteorological masts are visible and avoidable to aircraft. Management system controls are put in place to avoid aircraft accidents. Sensitivity of the receiving environment is expected to be moderate.	Expected impact: **Negligible** (refer to Table 5-2) If an unplanned event (aircraft collision with mast) occurs, the impact could be **critical**, however the likelihood is **rare**. This

Environmental significance assessment	Environmental significance assessment outcome
Potential cumulative effects of the proposed activities and infrastructure depends on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	represents a **medium** level of risk (refer to Table 5-4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No injuries, deaths or health impacts to the public or third parties from activities that could have been reasonably prevented by the operator.	Any notifiable incidents (as per s35 of the *Work Health and Safety Act 2012*) involving the public investigated by a suitably qualified independent third party and the results of the investigation show that the accident could not have been reasonably prevented by the operator.	Records of implemented measures to ensure visibility of meteorological masts to aircraft are maintained and their condition monitored. Records of safety incidents (or near misses) per the requirements of Revera's H&S Management Plan. Records of investigation into the incident, internal and external reporting (where required) and corrective actions to prevent recurrence. Aviation Impact Assessment conducted by a suitably qualified person, and submitted to Airservices Australia and Tumby Bay Council.

Public Health and Safety: Impact ID #SAF02						
Impact Event	Fires caused by the activities results in injuries or fatalities to members of the public.					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Use of equipment and machinery	Spread of fire	Local and regional community Flora & Fauna Landowner/ Land Users	Yes – if unplanned event occurs	Construction Operation Decommissioning	Location of activities and behaviour of fire in relation to receptors

Control measures	Uncertainties regarding likely effectiveness of control strategies

• Met Masts are installed with lightning rods, so that in the unlikely event of lightning strike, the energy generated by lightning is directed to a grounding system in the earth and away from the structure and ignitable materials.
• Emergency Management Plan (incorporating bushfire management plan) developed (and revised when required) in consultation with the relevant SACFS Regional office via the OMP.
• Land Access Agreement and Land Access Protocols in place to manage aspects such as:
  • Response Plan for the safety of crew personnel should a fire approach or be initiated by field crew with appropriate firefighting equipment available for use.
  • No access to site on Catastrophic fire danger days.
  • Ensuring all vehicles are fitted with appropriate fire-fighting equipment and spark arrestors. Avoiding driving over long dry grass.
  • *Fire and Emergency Services Act 2005* requirements complied with (e.g. procedures in place for permits for 'hot work' on total fire ban days and high winds).
	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event due to factors such as human error.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): There is limited potential for bushfires to be initiated by vegetation coming into contact with proposed activities and infrastructure, as the vegetation density in the region is typically low. Clearance distances between vegetation and infrastructure will be established and maintained. Management system measures are put in place to prevent initiation of wildfire and ensure propagation of potential wildfire is quickly managed.	Expected impact: **Negligible** (refer to Table 5 2) If an unplanned event (fire caused by the activities) occurs, the impact could be

Environmental significance assessment	Environmental significance assessment outcome
Sensitivity of the receiving environment is moderate. Potential cumulative effects of operational activities on local community depends on scope of other projects in the Permit Area but generally expected to be low as there limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	**critical**, however the likelihood is **rare**. This represents a **medium** level of risk (refer to Table 5 4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No injuries, deaths or health impacts to the public or third parties from activities that could have been reasonably prevented by the operator.	No uncontrolled fires as a result of activities.	Emergency Management Plan (incorporating a bushfire management plan) included in the OMP for approval and complied with. Fire prevention and firefighting equipment is present, certified and maintained in accordance with applicable standards. Fire and Emergency Services Act 2005 requirements are complied with.

Public Health and Safety: Impact ID #SAF03						
Impact Event	Project-related traffic increases road safety risk for local residents and other road users					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**SPR Uncertainties and assumptions**
	Increased traffic during: Meteorological masts installation Construction of temporary access tracks or laydown	Road accidents	Local community and road users	Yes –if unplanned event occurs	Construction Decommissioning	Location of Project sites and access points

Control measures	Uncertainties regarding likely effectiveness of control strategies
• Existing access roads and turn-arounds used where possible. • Drive at appropriate speed to avoid undue disturbance and in line with Access Protocols. • Traffic and journey management procedures followed. • Warning signage erected during activities where necessary (e.g. where there is significant traffic accessing sites from public roads). • Traffic management procedures developed in consultation with Tumby Bay Council and incorporated into the OMP.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event due to factors such as human soc.

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are short-term and small scale and require minimal additional traffic to the local road network. Management system measures are put in place to avoid traffic-related accidents. Sensitivity of the receiving environment is moderate. Potential cumulative effects of project related traffic on local community depends on scope of other projects in the Permit Area but generally expected to be low as there is limited infrastructure development within the Permit Area and no other proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5 2) If an unplanned event (traffic accident) occurs, the impact could be **critical**, however this is **rare**. This represents a **medium** level of risk (refer to Table 5 4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No injuries, deaths or health impacts to the public or third parties from activities that could have been reasonably prevented by the operator.	Traffic-related incidents investigated by a suitably qualified independent third party show that the accident could not have been reasonably prevented by the Operator.	Driver awareness training for all personnel. Approved OMP, including any Traffic and journey management procedures complied with.

Public Health and Safety: Impact ID #SAF04						
Impact Event	The activities and associated infrastructure increase public safety hazard					
Potential Impact	**Source**	**Pathway**	**Receptor**	**Confirmation of SPR**	**Project Phase**	**Uncertainties and assumptions**
	Activities and associated infrastructure (e.g. met masts)	Direct disturbance	Public	Yes – if unplanned event occurs	Construction Operation Decommissioning	• Location of infrastructure Proximity to areas accessible by members of the public

Control measures	Uncertainties regarding likely effectiveness of control strategies
Construct meteorological masts in accordance with relevant standards. Restriction of public access (e.g. fencing where appropriate, anti-climb design). Signage to indicate restricted access to discourage third party access to infrastructure.	High certainty that proposed control measures will be effective. Industry standard control measures that are well understood and that have been successfully implemented. Limited potential for unplanned event (injury to public from unauthorised access).

Environmental significance assessment	Environmental significance assessment outcome
Impact significance summary (avoidance, frequency, duration, extent, severity, cumulative, sensitivity, ALARP): The proposed activities are short-term and small scale and involve minimal additional public safety hazard to the local community. Engineering and management system measures are put in place to avoid increase in public safety hazard. Sensitivity of the receiving environment is moderate. Potential cumulative effects of project related hazards local community depends on scope of other projects in the Permit Area but generally expected to be low as there limited infrastructure development within the Permit Area and no other known proposed activities. Control strategies in place to manage impacts to ALARP are well understood and are regularly implemented.	Expected impact: **Negligible** (refer to Table 5 2) If an unplanned event (injury to public from unauthorised access) occurs, the impact could be **critical**, however this is **rare**. This represents a **medium** level of risk (refer to Table 5 4).

SEO	Proposed environmental objective	Assessment criteria	Leading performance criteria
	No injuries, deaths or health impacts to the public or third parties from activities that could have been reasonably prevented by the operator.	Any notifiable incidents (as per s35 of the *Work Health and Safety Act 2012*) involving the public investigated by a suitably qualified independent third party and the results of the investigation show that the accident could not have been reasonably prevented by the operator.	Safety audit does not identify additional actions that could reasonably be taken to reduce risks to the public. Records of safety incidents (or near misses), investigation into the incident, internal and external reporting (where required) and corrective actions to prevent recurrence via Revera's H&S management system. Records of the certification of the met mast design by a structural engineer and of building certification.

6 Environmental Management Framework

Construction and installation of met masts and their operation will be undertaken in accordance with Revera's Environment Policy as articulated through the Environmental Management Plan (ACH-F1-HSE-PLN-001) which was written to apply to all proposed activities occurring as part of the broader Cape Hardy GHP.

The objectives of the Environmental Management Plan are to:

- Provide a framework to identify and manage environmental risks, to reduce potential impacts to ALARP
- Provide a method to monitor, review and report performance against the management of risks
- Provide a continuous feedback mechanism to allow identification and recording of non-conformances and corrective actions to improve controls and to prevent or limit reoccurrence
    - Ensure effective systems for recovery after unexpected events and improvement of controls to prevent or limit impacts on reoccurrence
    - Provide a written document communicating the environmental management practices to Revera personnel and its contractors for training and raising awareness.

6.1 Environmental commitment

Revera's operations are governed by its Environment Policy , which details the commitment to ensure that reductions to environmental impacts are identified and implemented in its Projects and operations.

6.2 Environmental objectives

The Cape Hardy GHP's Environmental Objectives are therefore to:

- Incorporate environmental constraints and requirements into the design process, with the aim to avoid any potential risk to environment in the first instance
- establish effective environmental mitigations to protect the environment within, and around the Project site and its assets, where avoidance is not possible,
- Continue to consult and co-operate with local stakeholders and Project teams to identify hazards, respond to concerns, and create processes to protect environmental values
- provide and undertake environmental training relevant to the Project so that works are undertaken in compliance with the locally established environmental work practices
- Comply with all environmental requirements in all jurisdictions where Revera operates
- Implement effective monitoring and reporting methods through the Environmental Management Plan specific to assess and determine environmental compliance, and to ensure that opportunities for improvement are identified and implemented.

6.3 Roles and Responsibilities

Indicative roles and responsibilities for the Revera team are summarised in Table 6-1.

Table 6-1: Indicative Roles and Responsibilities

Role	Responsibilities
Revera Head of Australia	• Oversight and support of Revera Energy's commitment to the Revera Environmental Policy ('the Policy') • Monitor the performance of Revera's compliance with the Policy across Australia
Project Director	• Resource the implementation of the Project Environmental Management Plan and any supporting documents to ensure Policy commitments are being achieved • Lead management reviews and report environmental performance to Revera Head of Australia and Revera Board of Directors
Senior Development Manager	• Implement the Project specific environmental plans and procedures • Evaluate and report on Revera's environmental performance • Ensure contractor's environmental plant and procedures are appropriate and are in place prior to undertaking works • Ensure regulatory reporting is undertaken in line with legislative requirements
Approvals Manager	• Development and implementation of Project specific environmental plans and procedures • Provide environmental training and inductions, and maintain environmental training records • Ensure environmental non-conformances identified have been appropriately recorded and corrective actions closed out • Ensure a regular cycle of audits against environmental plans and procedures is occurring • Update environmental plans and procedures when required
All Revera Staff and Contractors working on the Project	• Undertake relevant induction and training • Implement actions and requirements identified in any environmental plans and procedures to manage environmental risks • Report non-conformances and identify opportunities for improvements • Stop works if environmental risks cannot be effectively managed to an acceptable level

6.4 Environmental management procedures

Environmental Management Procedures will be developed for the Proposed Activities subject to the REFP, as appropriate.

Procedures will be in place, whether Revera's own, or its contractors to avoid, minimise or offset any environmental and/or other impacts identified through the impact assessment process as documented in this Environment Impact Report. These procedures will outline the specific management and mitigation measures, performance monitoring, reporting and regulatory obligations requirements to ensure the Statement of Environment Objectives are met.

6.5 Contractor environmental management

Contractors will be undertaking works pursuant to the construction, installation, commissioning, maintenance and decommissioning of met masts. Any contractor engaged by Revera is responsible for applying existing, or developing and implementing job specific site environmental management plans or procedures as required to be implemented for the locations and activities where work is to be undertaken. These may include site specific maps and controls. Any contractor environmental management plans or procedures are required to be at least as stringent as those developed by

Revera. These plans may also require approval from Revera, and in some cases will require regulatory approval by the relevant government agency prior to the works relevant to that plan commencing. Contractor's undertaking works on Revera projects will also be subject to any inspection and auditing of compliance with Revera's Environment Management Plan, associated procedures and regulatory requirements.

6.6 Induction and training

Revera has an electronic record of induction and training. All Revera staff working on the Cape Hardy GHP are required to undertake training in line with approval documents and, if working on site, a site induction.

When a new, specific environmental procedure is developed, relevant staff (or contractors) requiring training will be identified and recorded in the electronic record, against their profile.

The nature of the met mast feasibility works is temporary, however, refresher training will be required if or when the Plan or Procedure is significantly updated during the term of this REFP.

Records of training will be kept for a minimum of five years.

6.7 Emergency response and contingency planning

An emergency environmental incident is considered to be a sudden and immediate threat to the environment that requires immediate action to minimise the risk of adverse environmental impacts. An environmental emergency may be natural (e.g. flood, bushfire) or due to Cape Hardy GHP activities (e.g. major equipment fault, significant or uncontrolled release of hazardous chemicals).

In the event of an incident, a Non-conformance procedure is to be followed with the incident assessed against the emergency specific triggers and the Revera Risk Matrix to confirm the Emergency Response Plan to be followed.

Contingency planning, in the form of specific Emergency Response Plans will be developed for the Cape Hardy GHP in order to (in order of priority):

- Reduce the threat to human life or injury
- Protect against environmental damage
- Preserve infrastructure and product

All plans will include the following:

- Emergency personnel roles and responsibilities
- Emergency Response Procedures
- Resources such as emergency equipment and procedures
- Communication protocols internally and externally with emergency services, local and state government
- Monitoring and reporting requirements
- Emergency Situation Checklist – specific to the situation the Emergency Plan is applicable to.

The Emergency Response Plans will be reviewed on a regular basis (minimum every 12 months) and updated. If an opportunity for improvement is identified, this will be entered into TOTUM and actioned via an update to the Plan as required. Copies of these Plans (and any revisions) will be supplied to the relevant SACFS Regional office.

6.8 Environmental monitoring and auditing

Monitoring programs will be implemented to monitor compliance with the environmental mitigation measures detailed in Environmental Management Procedures and any regulatory approvals requirements. This will include periodic inspections of Cape Hardy GHP areas during feasibility activity construction and operation against the relevant Procedures, conditions of approvals and applicable legislation.

Inspection parameters will be set prior to any inspection works, and all records of inspections will be kept in Revera's electronic compliance system, TOTUM. A summary of inspection will be reported to the Senior Development Manager and Project Director within 10 days of the inspection occurring, which will include a comparison to previous inspections of the same type, to identify any repeated non-conformances or performance trends.

These monitoring programs would also be subject to review to verify that the monitoring frequency is sufficient to identify potential non-conformance(s) with the identified inspection parameters, the range of parameters being monitored are adequate and the program of monitoring is appropriate for the activities occurring.

6.9 Incident management, recording and corrective actions

Any environmental incident or non-conformance must be reported to the Revera Approvals Manager or the Revera Senior Development Manager as soon as reasonably practicable (within 12 hours) verbally and entered into TOTUM within 24 hours.

The Cape Hardy GHP's Non-conformance Procedure must be followed, including an assessment against the Revera Risk Matrix to determine the risk of environmental harm. Where external reporting of the incident is required, refer to Section 10 of this document, and follow the relevant steps of the Non-conformance procedure regarding internal escalations.

Once recorded in TOTUM, any corrective action identified to resolve the non-compliance should also be entered and assigned to an Revera staff member or delegate, and a due date set for completion. Once resolved, a summary, including the date of the action, who undertook the action and what was done must be entered into TOTUM.

The action must then be assigned to Revera Approvals Manager (or delegate) to assess the actions undertaken before the non-conformance can be closed.

A review of non-conformances, including any trends and comparisons to the previous quarters must be prepared on a quarterly basis and reported to the Senior Development Manager and Project Director.

6.10 Complaints management

Any complaints from the community regarding potential uncontrolled environmental impacts during the construction, feasibility, commissioning or operational activities will be acknowledged, then recorded in the Cape Hardy GHP's electronic stakeholder communications database (SEAMS).

The complaint will then be assigned to an appropriate Revera staff member for investigation via an action through this database, and a due date set for completion. Once investigated, the complaint must be responded to, and any activity and correspondence will be recorded in this same electronic system.

Once resolved, a summary, including the date of the action, who undertook the action and what was done must be entered into TOTUM.

The action must then be assigned to the Revera Approvals Manager (or delegate) to assess the actions undertaken before the non-conformance can be closed.

A review of complaints, including any trends and comparisons to the previous quarters must be prepared on a quarterly basis and reported to the Senior Development Manager and Project Director.

6.11 Reporting

Any environmental or regulatory non-conformance that is identified through the environmental monitoring program or otherwise must be immediately (within 24 hours) be assessed against the Revera Risk Matrix and the Cape Hardy GHP's Non-conformance Procedure, must be followed. This will include an assessment against the relevant SEO and Revera's Obligations Register, to ensure that any mandatory regulatory reporting is undertaken in accordance with legislative requirements.

Revera must notify DEM as soon as reasonably practicable, but within the time period prescribed regarding any Serious Incident, as defined by the SEO relevant to the Proposed Activities. Where required, any environmental incident that meets the definition of causing material or serious environmental harm, as defined by the *Environment Protection Act 1993*, must also be notified to the EPA as soon as reasonably practicable.

Further incident details, impacts and corrective actions must also be reported to the relevant authority/ies, in line with legislative requirements.

7 Stakeholder Consultation

7.2 Context for Consultation

There were two different consultation processes required under the HRE Act to support Revera's application for the installation of up to three met masts within the Permit Area.

The first was consultation undertaken by Revera in accordance with a consultation plan approved by the Minister at least 10 days before the commencement of consultation activities began, as required under Regulation 33 of the HRE Regulations. The consultation plan aligns with Revera's overall stakeholder engagement strategy to deliver best practice engagement and provides a list of identified stakeholders, an overview of consultation methods to engage with stakeholders on the EIR and SEO and a description of how feedback will be considered.

The second consultation process commenced after Revera's consultation has been completed and the EIR and SEO updated as required and formally submitted. Once satisfied that the EIR and SEO meet all relevant provisions of the HRE Act and Regulations, DEM (on behalf of the Minster) undertook public consultation for at least 30 business days. Consultation includes referring the EIR and SEO to prescribed bodies and publishing a notice advising where the EIR and SEO can be obtained. Refer Section 7.5 for further information.

7.3 Stakeholder Consultation

Revera's stakeholder consultation process (conducted January – February 2025) included targeted consultation for directly impacted stakeholders with the purpose of receiving feedback on the EIR and SEO. In addition, general information about the process and met mast infrastructure was shared more broadly with the local community and potentially indirectly impacted stakeholders to facilitate community understanding. This process was undertaken prior to the commencement of DEM's formal consultation process.

Activities to support Revera's consultation included the following:

- DEM and relevant agency engagement will be undertaken, including presentation of Revera's overall Stakeholder Engagement and Communications Strategy, guidance on consultation requirements and ongoing communication during the REFP process.
- Identification of stakeholders, their potential interest and method of consultation as well as contact details and responsible Revera contact.
- Using existing planned engagement sessions such as scheduled landowner discussions and council and local interest group project introductions to introduce the REFP, met masts and associated timeframes.
- Seek interest from community groups about the potential to partner with the Port Neill Progress Association, Ungarra Progress Association, Tumby Bay Progress Association and / or Tumby Bay Community Consultative Group (TBCCG) to deliver an informal community information session in early 2025.
- Proactively inform local media via a project briefing with relevant contacts at the Port Lincoln Times and The Advocate.
- Development of communication materials including:
- Met mast factsheet with summary of the purpose, indicative structure design, monitoring period and timeframe. Include other related feasibility activities occurring.

- Regulatory process overview factsheet including intent of the permit, regulatory requirements under the HRE Act and EIR / SEO documents.
- Update to Revera website including overview of current activities and links to the met mast and REFP regulatory process factsheets.
- The e-news project update including current activities with short summary of REFP and met mast details.

E-news, factsheet and website will include contact details for stakeholders to find out more.

7.3.1 Stakeholder identification and consultation methods

Stakeholders have been identified as having an interest in or potentially being affected by the proposed met masts. Stakeholder groups are presented in Table 7-1.

Table 7-1: Stakeholder groups

Stakeholder group	Description
*Directly impacted landowners	landowners proposed to host met mast infrastructure **Moody Ungarra Precinct** Up to 7 x potential landowners **Cape Hardy Precinct** Up to 3 x potential landowners **Resource Tenement Holders within the Permit Area** Up to 6 x tenement holders
Indirectly impacted landowners	landowners directly neighbouring met mast infrastructure **Moody Ungarra Precinct** Up to 21 x potential neighbours **Cape Hardy Precinct** Up to 16 x potential neighbours
Potential Cape Hardy Industrial Port Precinct Proponents	Northern Water / Department of Infrastructure and Transport (DIT)
*Local Council	District Council of Tumby Bay
Local interest groups	Port Neill Progress Association Ungarra Progress Association Tumby Bay Progress Association Tumby Bay Community Consultative Group
Local Community	Communities including: Tumby Bay Port Neill Ungarra
*State Government Agencies	Department for Environment and Water (DEW)
	Eyre Peninsula Landscape Board
	Department for Energy and Mining (DEM)
	Department for Housing and Urban Development - Planning and Land Use Services
	Environment Protection Authority (EPA)
	Aboriginal Affairs and Reconciliation

	Department of Primary Industries and Regions South Australia (PIRSA)
	SA Country Fire Service (CFS)
*Traditional Owners	Barngarla Determination Aboriginal Corporation (BDAC)
Local Member	Member for Flinders
Federal Member	Member for Grey
Media	The Advocate The Port Lincoln Times

*Stakeholders identified as directly affected by the met mast REFP and will receive the EIR and SEO documents for review and feedback.

7.4 Consultation on Draft EIR and SEO

In line with the approved consultation plan, a range of consultation methods were implemented to ensure engagement with relevant stakeholders was undertaken and opportunities to give feedback were provided. Consultation and engagement incorporated both targeted (e.g. for directly impacted landowners and stakeholders) and general information sharing for broader project stakeholders (e.g. neighbours and local communities).

For example, directly impacted landowners were introduced to the potential option to host a met mast on their property and provided with initial information during land access discussions. Following, draft copies of the EIR and SEO were also shared with them during Revera's formal consultation period, ahead of the formal DEM consultation period. This will enable an immediate forum for the landowners to ask questions during the face-to-face land access meetings which will be followed by the provision of direct access to relevant information, direct contact points to ask questions and time required to further consider the met mast proposal and provide feedback.

Neighbours of potential met mast sites received direct emails advising them on the feasibility activities, regulatory process and the supporting factsheets for their information as well as direct contact details to ask any questions.

Communication materials to assist with providing relevant information to targeted stakeholders included:

- Draft EIR and SEO documents
- Wind resource monitoring / met mast specific factsheet
- REFP regulatory process overview factsheet

Revera Energy also attended "Under the Pines" , a local community event in Port Neill in early 2025 to assist with raising the profile of the project and activities in the region. This would allowed interested people to meet with Revera personnel in an informal setting.

7.4.1 Stakeholder feedback and outcomes of early engagement

Revera has a Stakeholder Engagement and Approvals Management System (SEAMS) used by all staff and consultants for the capturing of comments, feedback and engagement interactions. All feedback received was entered into SEAMS, an acknowledgement of receipt forwarded to the stakeholder via return email, with formal responses to follow.

The outcomes of early engagement activities have been addressed in the EIR and SEO prior to submission to DEM and the commencement of its formal consultation process.

7.5 Formal HRE Act consultation process

As noted in Section 7.2, the formal DEM consultation (on behalf of the Minister) process on the draft EIR and SEO was undertaken for at least 30 business days (30 June – 15 August 2025). This process included the publication of notices on the DEM website, within a local newspaper and The Advertiser and the referral of EIR and SEO documentation to relevant prescribed referral bodies. DEM also contacted all directly impacted landowners and the DCTB.

At the conclusion of the consultation period, DEM provided Revera with copies of all submissions received, which were entered into SEAMS.

Revera has consider all submissions and updated the EIR and SEO as appropriate. A consultation report is appended to the EIR and SEO as Appendix B, and includes all feedback received, relevant stakeholders and how any relevant issues have been addressed in the EIR and SEO.

7.6 Ongoing Consultation

Revera is committed to ongoing consultation with stakeholders in relation to the Cape Hardy GHP and for other potential development opportunities on the Eyre Peninsula. This commitment is supported by Revera's overarching Stakeholder Engagement Strategy which seeks open and transparent, flexible, accurate and responsive engagement that builds trust with its stakeholders and the communities in which Revera operate.

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Appendix A Summary of issues raised – stakeholder consultation undertaken by Revera Energy under Regulation 33 (January – February 2025)[6]

Table B-1: Summary of stakeholder comments and Revera responses

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
H2Ex (Resource Tenement)	General	Based on the indicative project areas shown in Figure 1-1 of the Environmental Impact Report (page 4), there should be no impact on H2Ex's near-term natural hydrogen and helium exploration activities in PEL-691. Therefore, no further discussion will be required at this stage. When available, we would appreciate it if Amp Energy could provide H2EX with the exact locations (including safety buffer) of the planned meteorological monitoring masts so we can consider any future impact on longer-term exploration plans.	We will be sure to share the exact locations of the planned meteorological monitoring masts, including the safety buffer, as soon as that information becomes available.	N/A
Renascor (Resource Tenement)	General	Your proposed Cape Hardy Green Hydrogen Project appears to conflict with our plans to explore and mine within Exploration Licences 6911 and 6423.	Thanks for your responses in relation to our correspondence regarding Amp's overall Cape Hardy Green Hydrogen Project, and to the draft EIR and SEO we provided to support our application for a Renewable Energy Feasibility Permit.	N/A

[6] Comments and responses refer to Amp Energy (or Amp), as consultation was undertaken prior to the change to Revera Energy in May 2025.

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
			While it is noted that this specific feedback doesn't relate to the draft EIR and SEO documents themselves, Amp would like to [meet and] better understand Renascor's view on how their planned exploration and mining of Exploration Licences 6911 and 6423 and Mining Lease 6495 (noted as North of the Proposed Project area) conflicts with overall Amp's proposed Project.	
AAR DPC	EIR	In relation to reporting requirements under the Heritage Act, the EIR should explicitly state that any discovery of potential human remains must be immediately reported to SAPOL, as required by the Coroner's Act 2003 (SA).	Amended Section 4.7 to include this reporting requirement.	EIR:4.7 Aboriginal Cultural Heritage. Included statement regarding immediate reporting, per feedback.
	SEO	Table 3-1 on pg.12 – AAR recommends that reporting the discovery of potential human remains to SAPOL should be listed under 'immediately reportable incidents' and reporting the discovery of sites and objects to AAR as soon as practicable should be listed under 'reportable incidents'	These requirements have not been added to Table 3-1, as it is strictly relevant to reporting to the Department of Energy and Mining under the HRE Act 2023, not other agencies. Reference to reporting requirements under other State legislation, including to SAPOL has been incorporated into 3.2.	3.2.4 has been added to the SEO
	SEO	Section 3.2 on pg.12 – AAR recommends that in addition to the reporting requirements under the HRE Act, EPA and SafeWork SA legislation, reference to section 20 of the Heritage Act should also be included.	Amended Section 3.2.	3.2.4 has been added to the SEO

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
CFS	General	[The CFS is]… supportive of the project which will see minimal impacts to the SA Country Fire Service, however as the towers will be located with the Lower Eyre Primary Response Zone (LEP PRZ), which is serviced by our aviation resources are your able to details how you will provide the locations and tower heights to the relevant stakeholders? Attached is Guideline D of the National Airports Safeguarding Framework, which references Marking and lighting of wind monitoring towers (section 40) and Reporting of structures less than 150m in height (section 41). Of note, there is no regulation to enforce these, it states that "Measures to be considered should include…".	Amp will be notifying any immediate neighbours, the CFS, relevant government agencies who have requested exact locations and the Aeronautical Information Service (AIS) provider and the RAAF AIS, via Airservices Australia (as recommended by CASA) of the location and final confirmed met mast height in writing (via email) once these details are confirmed. Amp also confirms that it has considered this guideline in the development of the draft EIR and SEO documents and has referred directly to it in the EIR Section 3.2.1, and the measures detailed within it, which Amp is planning to implement. This section has been updated to include additional information provided by CASA when following up directly regarding the planned met masts in February 2025.	**EIR: 3.2.1 Met Mast Installation** – additional clarifications t recommendations, as advised by CASA February 2025.
DEW – Conservation Parks Mgt	General N/A	Further to our discussion on 22 January 2025, I write to thank you for making us aware of your plans. It is good to know that you have no intention of placing a meteorological mast in Moody Tanks Conservation Park, or in any native vegetation. As discussed, if you do decide to locate a meteorological tower in any of the land parcels that abut Moody Tanks Conservation Park please let us know.	The final selection of the two (up to three) parcels will require the relevant technical, environmental, social and cultural heritage agreements and surveys to be complete and in place. In the case of proximity to the Moody Tanks Conservation Park (CP), in the case that a met mast will be located in the land adjacent to the park, all parts of the met mast will be, at a minimum, 500m from the CP, in line with the relevant Planning and Development code. This has been incorporated into the EIR.	**EIR:3.1.1 – Selection of locations for the permit area: siting of met masts:** 500m separation distance to any conservation zoned land

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		I have forwarded your information to our regional office in Port Lincoln so that they can advise me of the ecological values of Moody Tanks Conservation Park. I will send this information on to you when I receive it so that you can take these into account during the planning phase for your meteorological mast.		
DHUD	General.	We note that the current referral applies to the establishment of up to three (3) Meteorological Monitoring Masts in the Moody Ungarra and Cape Hardy Precincts to support a future renewable energy development as part of a wider project by AMP Energy on the Eyre Peninsula. Under previous planning rules, met masts were considered routine developments when assessed under the PDI Act, and *generally* envisaged in rural/primary production type zones. The permit areas identified in Figure 1.1, generally accord with a Rural Zone under the P&D Code. The only conservation zoned land in close proximity to a permitted area is located north-west of Ungara (sic), being the Moody Tank Nature Reserve. We see no particular issues involved in the construction and eventual decommissioning of a met mast in rural areas, subject to appropriate consideration of other environmental and locational issues (i.e. vegetation	Engagement with the Council of Tumby Bay, CASA and Airservices Australia has been undertaken & will continue to ensure any setbacks and requirements throughout the design, siting, construction, operation and eventual decommissioning and rehabilitation of the met masts are addressed.	**EIR:3.1.1 – Selection of locations for the permit area: siting of met masts:** 500m separation distance to any conservation zoned land

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		clearance, threatened species, natural and built heritage, safety etc. Given the height of the met masts (generally being the proposed hub height of future wind turbines), the metal structure and guidewires can be difficult to visualise and identify by light aircraft – including CFS fire bombers and aerial spraying aircraft of crops/insects/vermin - and can pose an aviation safety risk if not appropriately recorded and identified (coloured guide wire sleeves and marker balls, mast lighting etc). We note the EIR covers this aspect in some detail. We note certain setback minimums have been applied in section 1.3 in the SEO /3.1.1 in the EIR, this should also include setback minimums from private airstrip or landing fields which can also be found on larger land holdings, and setbacks to conservation areas (which under the P&D code seek a 500m minimum). The setbacks required to landing fields/private airstrips (and the location of taller obstacles more generally) can be found in relevant CASA guidance. We would expect some form of risk assessment to be undertaken. Given the nature of development and likely impacts, no objection is raised from DHUD-PLUS in respect to		

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		the proposal – noting that no precise locations for their installation have been identified within the permitted area, so is difficult from a development assessment perspective, to be definitive.		
BDAC	General N/A	Legal Counsel has advised that BDAC will not be providing specific comment regarding the SEO and EIR as confidentiality arrangements regarding places will not be in place. To ensure compliance with the Heritage Act [1988], BDAC considers an appropriate cultural heritage assessment, undertaken under a preliminary heritage agreement would be appropriate.	[Amp] understands and respects the position that an EIR or SEO is not a method BDAC can use to assess locations. However, the draft EIR and SEO does outline our commitment to ensure compliance with the Act by: a. developing and implementing a Cultural Heritage Management Plan in consultation with BDAC; b. ensuring cultural heritage surveys prior to proposed works are conducted (where access is agreed with the landholder); and c. nominating that appropriate cultural heritage monitors are present as required for any land clearance or disturbance (where access is agreed with the landholder). Amp agrees entering into a short-form preliminary heritage agreement is an appropriate way forward to ensure the above feasibility work can occur in accordance with an agreed cultural heritage framework and to meet the commitments outlined in our draft EIR and SEO. (Amp) understands and respect the position that an EIR or SEO is not a method BDAC can use to relay heritage	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
			information, including due to confidentiality concerns. Amp believes that the measures outlined above in points 2 and 3, will demonstrate compliance with the Act, in addition to ensuring heritage information is protected.	
DEW NVC	General	Given the locations of the met masts are unknown at this stage, Amp's statement that the met masts will be constructed within cleared paddocks cannot be verified.	Noted. However, as the parcels of land that make up the REFP comprise freehold land with a primary use as broadacre agricultural, Amp's intention to construct within cleared paddocks where native vegetation is verified as not being present is realistic. Combined with the setbacks outlined in the SEO and EIR, avoiding native vegetation clearance and impacts at the yet to be finalised met mast location/s is achievable.	N/A
	General	It is possible that native vegetation will be impacted in some form to install a met mast, including tracks to get to the location for installation. Until the locations of the met masts are known as well as the method of installation, the NVB cannot advise that there will be no impact on native vegetation. If there is any impact to native vegetation, Amp will need to engage an Accredited Consultant to prepare Data Reports for any application to clear native vegetation.	Noted. However, Amp will take all reasonable measures to avoid impacting native vegetation including clearance by appropriate siting of the met mast. Refer to EIR Section 5.3.4 Flora, Fauna and Biodiversity for the assessment of risk, identification of impact events, and control measures to be undertaken to minimise the risk of impact to native vegetation While all reasonable measures will be undertaken to try ensure native vegetation clearance as a result of ancillary activities (e.g. road/track widening for heavy) vehicles during construction of met masts does not occur, Amp acknowledges in the draft EIR that if unavoidable, that appropriate clearance approvals must be in place. Amp also nominates in the draft SEO that if this occurs without the appropriate approval, that this is an impact event	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
			that is reportable to the Regulator. Refer SEO Table 3-1 which defines incidents involving impacts to native vegetation pursuant *to Native Vegetation Act 1991* (flora) and *National Parks and Wildlife Act 1972* (fauna) to ensure that in the unlikely event of unplanned impacts to native vegetation, that this is appropriately reported.	
	General	The project area is large and there is existing native vegetation within the identified project area.	Noted. However, as the final footprint of the met mast location/s within this Project area will only be a comparatively small area, it is realistic and achievable to avoid impacts and clearance of native vegetation as outlined in the responses provided above.	N/A
	SEO	Page 12 of the draft SEO: it is suggested that Table 3-1: Incident definitions for construction and operation of met mast include “Any additional removal of native vegetation without appropriate approval (accidental or intentional)” pursuant to Native Vegetation Act 1991 (flora). Currently the table is limited to reporting for “Any removal of rare, vulnerable or endangered flora and/or fauna without appropriate permits and approvals” – the NV Act definitions are broader than what is reflected here.	There is a footnote to the draft incident definition quoted from Table 3-1, specifying that it is "Pursuant to Native Vegetation Act 1991 (flora) and National Parks and Wildlife Act 1972 (fauna)", which covers the request to include the reference to the Act. This incident definition, including the footnote is consistent with other SEOs in rural and regional locations and it is proposed that the wording remains the same.	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
DEW Coastal Protection Board	General	The Cape Hardy Precinct is made up of 27 allotments, only 4 of which are coastal (CT 6263/807 D60630 A1, CT 5884/453 D60630 A2, CT 6263/814 D60630 A4 and CT 6263/815 D60630 A6).	Note that the submitted REFP had outlined that the Cape Hardy Precinct contained the following 4 coastal allotments (CT6263/807 D60630 A1, CT 6263/815 D60630 A6, CT 6263/814 D60630 A4 and CT 6262/997 D60630 A3). CT 5884/453 D60630 A2 does not form part of the application. Notwithstanding, all coastal parcels will be removed from the REFP application, as these have been ruled out as potential met mast locations, and the draft EIR and SEO updated to reflect this change.	General update of the EIR and SEO, including associated maps to remove all REFP land parcels that abut the coast.
	General	Coast Protection Board (CPB) policy seeks that development minimises impacts on the visual amenity of the coast. The proposed met masts are unlikely to impact on important coastal landscapes from a CPB policy perspective given the remoteness of the site from coastal visitor (tourism) nodes and lookouts. Further, it is understood that the met masts would be temporary and removed once wind turbine construction activities commence.	Noted. Please be advised that all coastal land parcels that were in the REFP application have now been ruled out as met mast locations and have thus been removed from the submission (March 2025). Please also note that while temporary, met masts may remain in place post-turbine construction to verify performance and gather wind data, and thus the EIR outlines the met masts be in place for the term of the Permit.	As above
	General	Coastal issues or values that occur within, or adjacent, the four coastal allotments: o Sand dunes are present. Neither the landscape and ecological value nor the coastal hazard risk of the sand dunes are addressed in the draft EIR; o The area is frequented by coastal raptors; o Native coastal vegetation is present;	Noted. Please be advised that all coastal land parcels that were in the REFP application have now been ruled out as met mast locations and have thus been removed from the submission (March 2025).	As above

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		o A number of State and Nationally threatened species have been recorded on or adjacent four coastal allotments, including the Hooded Plover.		
		Should it be proposed that any of the three met masts be located on any of the four coastal allotments, it is recommended that further comment and advice be sought from DEW. Further investigations, surveys and/or mitigation measures may be required - for example it is recommended that Amp engage a coastal raptor expert if the proposed met masts are to be located on the four coastal allotments.	Noted. Please be advised that all coastal land parcels that were in the REFP application have now been ruled out as met mast locations and will be removed from the submission (March 2025).	As above
DEW (Water Science Unit)	General	Spatial layers of the project area are requested with follow up consultation processes to overlay DEW assessment layers. DEW also requests that relevant spatial layers are provided where possible in future stages of this consultation to assist with assessment.	Noted and shapefiles of the proposed REFP land parcels have been provided via email 6 March 2025.	N/A
	EIR	Specific locations of met mast installations are not provided, only a number of 'suitable' installation parcels within the project area. o Several ephemeral drainage lines are shown to pass through identified suitable parcels (Figure 4-3 of the EIR). Sites for the masts should avoid these drainage lines should be avoided. o Met masts are proposed to be located a minimum of 100m from surface water features.	Noted. Masts will avoid surface water features and ephemeral drainage lines. The met masts are proposed to be located a minimum of 100 m from surface water features, double the understood standard for these types of structures to further reduce the likelihood of any impacts to surface waters.	N/A
	General	Met masts have a small base footprint area of only a few metres square.	Amp confirms that per 3.2.1 of the EIR that "Met masts have a small footprint at their base with a larger guy wire span that is proportional to the met mast height.",	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
			however the exact footprint size will be determined on the final location and site characteristics (e.g. geotechnical).	
	EIR	Minor risk of shallow groundwater contamination from construction works however it is noted this is the remit of the EPA.	Noted. Refer to Table 55, Impact ID GWR01 for Amp's assessment of this risk.	N/A
DEW (Conservation and Biodiversity)	EIR	Consistent with comments by the Eyre Peninsula Landscape Board, stronger consideration of control measures for the spread of weeds is suggested. Specifically: Criteria 2 - Identification of potential impact events - BIO02- spread of Weeds of National Significance (WoNS) should be described as an impact event on page 65 as Possible. Described as social environment, land use and infrastructure impact but also a threat to biodiversity. Could be cross referenced with SOC02. Criteria 3 - Confirming the potential of impact events - Table 5-5 ID BIO02 has weed/pathogen spread as 'No' for confirmation. WoNS in permit areas and should be classed as Possible. Assuming site selection will avoid this potential impact. However, it is stated that WoNS including Buffel Grass and African Boxthorn are likely to occur in the permit area. Both of these WoNS can be spread by vehicle movement and risk to biodiversity. Described as social environment, land use and infrastructure impact but	Noted. EIR Table 5-5 - The S-P-R linkage has been updated to Potential for BIO02, and a new impact table developed and added for BIO02 to cover risk to biodiversity. This new impact table is considered to more appropriately cover this potential risk, rather than cross-referencing to SOC02.	EIR Table 5-5 ID BIO02 to 'potential'. - Amended EIR to include impact table for BIO02

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		also a threat to biodiversity. Could be cross referenced with SOC02.		
	EIR	Criteria 4 - Identifying relevant control and management strategies - SOC02 Language regarding vehicle wash down 'where appropriate' and between properties 'when required' could be strengthened to be the standard especially for clearing new access tracks as roadworks a likely mechanism of spread. Notification of authorities on identification of these weeds and education of staff in inductions would be beneficial. Could also limit off road/track driving to only when necessary. For BIO01 and BIO03 identification of known and likely biodiversity values could be done through consultation with DEW.	Updates to EIR to incorporate: • "Notification of authorities (e.g. Landscape Board) on identification of WoNS in accordance with *Landscape SA Act 2019* requirements" • "education of staff e.g.through inductions"; and • "limiting off road/track driving to only when necessary" as control measures to SOC02. Updated SEO Section 3.2.5 to note notification/reporting requirements to the EP Landscape Board, per the requirements of the *Landscape SA Act 2019.* Thank you - Amp has requested to meet with the broader DEW team to further discuss in March 2025.	EIR Section 5.3.9 / SOC02 – updated to incorporate notification requirements and limiting bio SEO Section 3.2.5 Added
	General	DEW's preliminary biodiversity values analysis shows that the area does contain several biodiversity values including Nationally and State listed species. DEW can support early discussion on biodiversity considerations to inform Amp's project siting and design.	Thank you - Amp has requested to meet with the broader DEW team to discuss in March 2025.	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
	EIR	HRE Regulation 32(2)(c) requires that an EIR must contain: data relating to biodiversity within the area of land to which the report relates that can reasonably be expected to be affected by authorised operations. Amp, via on-ground surveys, will be required to submit biodiversity data collected throughout the project to DEW. Again, DEW is able to support Amp to satisfy this new legislative requirement.	Noted. The EIR and SEO assessment criteria includes a requirement to report all biodiversity data, which will be provided to DEM after it is collected – Amp will work with DEM and DEW in order to ensure that the data is supplied in the method and format needed to satisfy the requirements of HRE Regulation 32(2)c in line with recent feedback from DEM.	N/A
	General	DEW welcomes future engagement regarding this project by Amp and the Department for Energy and Mining. We reiterate that on request, relevant DEW officers can work with Amp to support the identification of biodiversity values/considerations to assist Amp to meet its legislative obligations under the HRE Act and other relevant legislation.	Noted - Amp has requested to meet with the broader DEW team to discuss in March 2025.	N/A
Eyre Peninsula Landscape Board	EIR	The draft EIR would be strengthened by proposing an effective Weed Management Plan, especially considering that WoNS have been observed in the project area, as per statement below: Section 4: Overview of existing environment / 4.4.5. Weeds, pests and pathogens (pg. 32) Weeds of National Significance (WoNS) have been observed within the Cape Hardy GHP Area (Figure 4-11), including but not limited to Asparagus asparagoides f. asparagoides Bridal Creeper, Cenchrus	Amended.	EIR 5.3.9 Revera will ensure appropriate weed management strategies and control measures are incorporated into an Operational Management Plan that will be submitted for approval to the Minister, in line with legislative requirements.

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		ciliaris/pennisetiformis Buffel Grass and Lycium ferocissimum African Boxthorn. Records are more concentrated along roads however this may be reflective of where there is greater ease of access compared to within the land parcels.		
	EIR	Amp should reconsider the described expected consequence associated with the Impact ID #SOC02 (Introduction and spread of weed(s), pest(s) and/or pathogen(s) to land use) from Negligible to Minor. Pest plants (for example Buffel grass) can spread quickly, particularly in construction sites where traffic of vehicles and earth movement increases compared to undisturbed sites. It is considered that the proposed change would not alter the level of risk attributed by Amp (low risk) but could warrant the development of mitigation strategies such as an appropriate weed management plan.	Agreed that the consequence of an unplanned event could be Minor, which is reflected in the risk assessment in this table. The expected impact (i.e. the planned or predicted) has been retained as Negligible, as controls will be in place and weeds are not predicted to be spread by the activities.	EIR 5.3.9. Revera will ensure appropriate weed management strategies and control measures are incorporated into an Operational Management Plan that will be submitted for approval to the Minister, in line with legislative requirements.
Heritage South Australia	General	The State heritage-listed Water Tank, Moody Rocks, Moody Tank Conservation Park (SHP 14249), west of Ungarra, (Confirmed in the SAHR on 23 April 1992) appears to be located adjacent to one of the proposed Permit Areas (refer to enclosed map). The heritage significance of this Water Tank is as follows: *The Water Tank at Moody Rocks was built to provide water for steam trains passing by at the foot of the granite slope. It is an ingenious construction with a huge catchment area. By using a geomorphological feature much success has been obtained in providing*	N/A	No specific request in this feedback, however, noting in line with DHUD's response that an update to EIR:3.1.1 – Selection of locations for the permit area: siting of met masts: 500m separation distance to any conservation zoned land.

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		a continual supply in an area where water is scarce. It is also of much importance to the local community, which uses it as a recreational area. On the basis that the 'met masts' will be located within cleared paddocks, Heritage South Australia is of the opinion that there will be 'no heritage impact' on this State Heritage Place.		

Appendix B Summary of issues raised – HRE Act consultation undertaken under Sections 72 and 73 (June – August 2025)

Table C1: Summary of Stakeholder comments post-public Consultation and Revera responses

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
PIRSA	EIR	The consideration of social values in the EIR is limited, focusing only on non-Aboriginal heritage. While Revera outlines stakeholder consultation and social licence (pg. ix), broader social and regional impacts are not addressed. Noting, the immediate proposal has minimal effects on employment, community infrastructure, local businesses/industries, and community wellbeing, these aspects should still be acknowledged. This is particularly important given the potential longer-term social impacts associated with the broader Cape Hardy GHP project.	Aboriginal Cultural Heritage and Non-Aboriginal Cultural Heritage are both covered in the EIR in separate sections (4.7 and 4.8), and have both been assessed using the Environment Impact framework, under Section 5.3.8 (Impact IDs #HER01 and #HER02 respectively). While outside the scope of this immediate proposal due to the noted minimal impacts, Revera has in place a specific stakeholder engagement strategy and plan for the broader Cape Hardy GHP. This outlines how Revera addresses the aspects noted over the lifetime of the broader project. Revera acknowledge the long-term nature of the proposed broader Cape Hardy GHP, and is in regular contact with Council and key community stakeholders to ensure they are aware of any activities, including this proposal, that are underway.	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
PIRSA	EIR	Section 5.3.9 - Social impacts are considered only as a landholder. Given the proximity of the met masts to a Conservation Park, potential impacts on tourism values should be addressed. A clear timeline for decommissions is important.	The met masts' potential visual amenity impacts to the local community and visitors to the region (including tourists) are contemplated in Table 5-5 and Section 5.3.7, and considered/assessed under #VIS01. To highlight the specific consideration of these stakeholders and the Conservation Park, the Impact Event has been amended to also include 'visitors to the region'.	Impact ID #VIS01
PIRSA	N/A	The documentation addresses biosecurity risks related to plant pests and pest animals, it does not reference or consider risks associated with livestock diseases. Given that the property is used for livestock grazing, it would be appropriate to include consideration of livestock biosecurity risks—particularly considering the mandated referral under the *Livestock Act 1997*.	Impact ID #SOC2 assesses livestock biosecurity risks, proposes control measures and specifically lists livestock as a potential receptor to biosecurity issues (weeds, pests, pathogens). To make the consideration of this potential receptor clearer, Impact Events in Section 5.3.9 of the EIR has been amended to include: *Introduction and spread of weed(s), pest(s) and/or pathogen(s) impacts to land use or to livestock on the land*. Additionally, Table 5-14 has been updated to include the *Livestock Act 1997* to Applicable Legislation.	EIR Table 5-14 EIR Section 5.3.9
Tumby Bay Council	EIR	The Council notes the following two areas, as already identified within Section 5.3.10 of the Environment Impact Report, where	Noted and confirming that Revera is actioning the Council's requests and the assessment and requested information will	SEO Objective 7; EIR Section 5.3.10 #SAF01

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		additional information is sought or Council permits may be required. 1. Tumby Bay Aerodrome The proposed meteorological masts may impact on published Instrument Flight Procedures for theTumby Bay Aerodrome. These Flight Procedures are critical for the safe and effective operation of the Aerodrome. The Council has requested Revera Energy to prepare and provide an Aviation Impact Assessment for consideration of the Council, as owner of the Aerodrome, along with evidence of engagement with CASA Airspace, Protecon and Airservices Airport Development and Instrument Flight Procedure Teams. The Council understands that this documentation is under preparation at the date of this submission	be submitted to its satisfaction prior to the final placement of the met mast/s.	
Tumby Bay Council	EIR	2. Local Area Traffic Management The Environmental Impact Report notes the potential impacts of project traffic, including on noise, air quality and road safety. Project related traffic is identified as a '*small increase in traffic volumes during construction, including some large loads and potential requirement to turn into site access tracks from public roads*'. The Council requests additional detail on anticipated types and volumes of vehicles to be generated by the installation of the meteorological masts. It is noted that any requirement for access by restricted access vehicles i.e. oversize or over mass vehicles will require specific consultation with and approval	While subject to final design and site conditions and the pre-construction assessment noted in Section 3.2.2 of the EIR, it is expected that there will be less than 12 vehicles required per met mast on a daily basis for 4 -6 weeks. For the met mast, these will nominally be 4WD vehicles, trailers and a 6-tonne truck and crane, as well as concrete trucks. Revera will need to prepare and supply an Operational Management Plan (OMP) to DEM for approval prior to any construction works, which will contain the confirmed vehicle requirements and detailed site plans. A copy of the OMP can	SEO Objective 7; EIR 5.3.10 #SAF03

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		from the Council, via application through the National Heavy Vehicle Portal.	also be supplied to Tumby Bay Council, and any traffic management procedures will be developed in consultation with Tumby Bay Council. It is not anticipated that oversize or overmass vehicles will be required for the met mast construction, operation or decommissioning. However, in the case over mass or oversize vehicles are required, Revera confirms that it will apply for the relevant approval through the National Heavy Vehicle Portal, as noted by Council.	
Eyre Peninsula Co-operative Bulk Handling (EPCBH)	N/A	We are a farmer co-operative based on Eyre Peninsula with active farmer members located across the region. We are providing our support to the application by Revera Energy (formally AMP Energy) to install Met Masts within the Cape Hardy, Moody/Ungarra district. Our cooperative has signed an access agreement with Revera for our land located nearby to the Cape Hardy proposed port on Eyre Peninsula. A number of our cooperative members are also within the Met Mast and environmental monitoring zone. We have been working closely with Revera Energy (formally Amp Energy) over the past couple of years and have found their conduct to be very respectful. Their team has made a concerted effort to engage with farmers and understand our industry and any concerns we have	Revera appreciates the acknowledgement of its team conduct/engagement with the local Eyre Peninsula farmer co-operative (and future neighbours) at Cape Hardy.	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		surrounding their renewable energy and hydrogen development plans.		
Airservices: Airspace Development and Protection	N/A	Airservices Australia has no comments at this stage regarding the proposed Cape Hardy GHP meteorological masts. Please note that proposals involving meteorological masts may require an Aviation Impact Assessment (AIA). It is recommended that the applicant engage an aviation consultant to facilitate submission of the application to Airservices for the assessment of any potential impacts on Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) and Communication, Navigation, and Surveillance (CNS) systems.	Noted – in line with Tumby Bay Council's requirements, Revera will submit an Aviation Impact Assessment, which will be prepared by an aviation consultant.	SEO Objective 7; EIR Section 5.3.10 #SAF01
Department for Housing and Urban Development – Crown & Impact Assessment Team	EIR	The EIR does not identify specific locations for the met masts; however, both the Moody Ungarra and Cape Hardy Precincts are located entirely within the Rural Zone. The Rural Zone of the Planning and Design Code (the Code) anticipates a range of primary production activities and renewable energy facilities. The Zone seeks to protect and maintain the productive value of rural land, with renewable energy facilities and ancillary development sited to minimise significant fragmentation or displacement of existing primary production. Temporary met masts are considered relatively low impact (with respect to land use) and not expected to prejudice existing or envisaged land uses in zone. <u>Recommendations:</u> NA	Noted.	N/A
Department for Housing and Urban	EIR	The final siting of the met masts will be critical to avoiding / minimising environmental impacts, in particular the clearance of native vegetation and disturbance of native fauna. The control	Noted.	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
Development – Crown & Impact Assessment Team		measures identified in the EIR and SOE are generally appropriate, however actual impacts cannot be assessed at this time and will depend on the micro-siting process. With respect to visual, interface and aviation impacts, the P&D Code identifies set back requirements for wind turbines and solar infrastructure, but not specifically for met masts. The setback criteria listed in section 3.1.1 of the EIR / section 3.1 of the SOE are considered reasonable and appropriate, noting the following: ▪ The minimum setback of 500m from conservation areas is appropriate to mitigate impacts to the Moody Tank Nature Reserve which is directly adjacent the Ungarra permit area. ▪ As noted in DHUD's 18 Feb 2025 stakeholder feedback to AMP Energy, is it recommended that the EIR / SOE include a setback to landing areas / private airstrips. Notwithstanding, the control measures listed in #SAF01 of the EIR (which include identification of private landing areas / airstrips, consultation with owners, and an aeronautical risk assessment for met masts taller than 150), are generally acceptable. The suite of control measures provided in the EIR (#SAF01) are expected to mitigate risk to low-lying aircraft, including CFS fire bombers and aerial spraying craft. The met masts should be designed and constructed in accordance with relevant CASA guidelines, including the *National Airports Safeguarding Framework Guideline D* (DITRDCA 2012). <u>Recommendations</u>	Revera acknowledges DHUD's advice that the set-back criteria proposed (including the minimum set-back of at least 500m from conservation areas such as the Moody Tank Nature Reserve) is considered appropriate, and that the suite of controls noted are expected to mitigate potential risks to low-lying aircraft. Revera confirms that the met masts will be designed and constructed in accordance with the relevant CASA guidelines, including the referred to *National Airports Safeguarding Framework Guideline D* (DITRDCA 2012). Revera also acknowledges that final siting of the met masts, and confirmation that the setbacks proposed have been complied with is formalised in a condition of Permit. Revera has no objection to this recommendation.	

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		If a permit is granted, a condition relating to the final siting of the met masts is recommended to confirm compliance with the setback criteria listed in the EIR, and to demonstrate that relevant Environmental Objectives are achieved.		
Department for Housing and Urban Development – Crown & Impact Assessment Team		The subject site is within the Eyre and Western Region planning area. The current policy framework relevant for the subject site is the Eyre and Western Region Plan (April 2012). The proposal is generally consistent with the principles of the plan, to protect the region's energy resources, and encourage the development of renewable energy and supporting infrastructure. As required by s64(1) of the PDI Act, the State Planning Commission has initiated the process to prepare a new regional plan. The draft Eyre and Western Regional Plan confirms the region as a significant generator of renewable energy. Recommendations: NA	Noted.	N/A
Department for Housing and Urban Development – Crown & Impact Assessment Team		The proposal directly relates to State Planning Policy 12 (Energy) which seeks the facilitation of renewable energy facilities where the impact on surrounding land uses, regional communities and the natural and built environment can be minimised. Recommendations: NA	Noted.	N/A
		The northeastern portion of the Cape Hardy Precinct is on land owned by IRD Port Assets Pty Ltd and subject of an approved Major	Noted.	N/A

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		Development initially issued to Iron Road Ltd under the *Development Act 1993* (repealed) – refer image below. Iron Road's current approval is for a deep-sea port associated with the Iron Road Central Eyre Iron Project and would be capable of loading various bulk sized carriers. Supporting infrastructure includes a 150km infrastructure corridor (transmission line, sea water supply pipeline and rail line), and an accommodation village at the township of Wudinna. This development was approved on 3 May 2017 by the Governor of South Australia. Iron Road Ltd has until 3 May 2027 to commence construction. Further information on the project is available on the PlanSA website (Cape Hardy - Deep-Sea Port | PlanSA). If the Iron Road and/or Revera Energy projects proceed, amendments may be required to the existing Iron Road development approval to accommodate the project footprint(s). Recommendations: NA		
AAR – AGD	SEO	AAR provided the attached feedback to Revera Energy (formerly Amp Energy) in February 2025 in relation to the above-referred EIR and SEO. AAR notes that Revera Energy has considered AAR's recommendations in that correspondence. Minor comment – regarding section 3.2.4 of the SEO, reference to "*Department of Premier and Cabinet – Aboriginal Affairs and Reconciliation (DPC AAR)"* should be changed to *"Attorney-General's Department – Aboriginal Affairs and Reconciliation (AGD-AAR)"*.	Noted and updated the SEO with corrected reference.	SEO Section 3.2.4
SA CFS Development	N/A	The SACFS recommends establishing and maintaining an Asset Protection Zone (APZ) to create a setback/buffer to any infrastructure using mineral earth breaks, roadways and/or areas of managed	Noted. No substations, inverter stations and/or control buildings are proposed as part of these activities. Notwithstanding,	N/A

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Assessment Services		vegetation to prevent or prohibit the spread of bushfires to and from the site, minimising the risk to life and or damage to buildings and property and maintain a fuel reduced zone for safe movement of occupants and firefighters. SACFS recommends all buildings and infrastructure such as Substation, Inverter stations, and Control Buildings or alike should be located no less than 10 metres from the property boundaries or existing remnant vegetation being retained, for the purposes of maintaining an APZ.	Revera will include site specific details incorporating the recommendations noted here into the Operational Management Plan that will require approval by DEM prior to any construction works, as required.	
SA CFS Development Assessment Services	N/A	Any future internal road networks should be designed to achieve compliance with the 'Roads' Performance Outcome relevant to the hazard overlay. Perimeter roads with a minimum formed road width of 6 metres should be incorporated to achieve adequate separation between infrastructure and areas of bushfire hazard to support safer access for the purposes of firefighting or provide mineral earth breaks for passive protection from spread of fire to and from the site.	Noted. While it is not envisaged that future internal roads will be established for the construction or operation of met masts, as Revera will need to supply an Operational Management Plan to DEM for approval prior to any construction works. This will include site specific details incorporating the recommendations noted, if required.	N/A
SA CFS Development Assessment Services	N/A	All access/egress roads on the project site: • Shall be constructed with a formed, compacted, self-draining, all-weather surface. • Roads shall have a minimum formed road width of 6 meters, or if constructed less than 6 metres wide, access shall include appropriately sized passing bays or turning areas, spaced no more than 200 meters apart to support safer access for the purposes of fire fighting: o Passing bays minimum width of 6 metres and length of 17 metres, or	Noted. It is not envisaged that roads will need to be established for the construction or operation of met masts, as the intention is to utilise existing road networks. However, if required, Revera will include these noted recommendations noted into the Operational Management Plan that will require approval by DEM prior to any construction works.	N/A

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		o 'T' or 'Y' shaped turning area with a minimum formed length of 11 metres and minimum internal radii of 9.5 metres. • Incorporating cul-de-sac endings or dead end roads has either: o A turning area with a minimum formed surface radius of 12.5m, or o 'T' or 'Y' shaped turning area with a minimum formed length of 11 metres and minimum internal radii of 9.5 metres. • Shall be constructed with a minimum external radius of 12.5m for all road curves. • Shall not exceed a gradient of 16 degrees (29%). • Shall incorporate solid all-weather crossings over any water-course capable of supporting firefighting vehicles with a gross vehicle mass (GVM) of 21 tonnes. • Vegetation overhanging the access road shall be pruned to achieve a minimum vehicular clearance of not less than 4 metres width and a vertical height clearance of 4 metres. • Shall allow fire-fighting vehicles to safely enter and exit the site in a forward direction by incorporating a loop road around the site. • All access gates to be readily accessible to attending fire service units, this maybe with the use of a Lockwood 003 type padlocks. Note: Other fire safety measures pertaining to roads may be prescribed by the National Construction Code.		
SA CFS Development Assessment Services	EIR	Emergency Response Planning The Bushfire Management Plan and the Emergency Management Plan will need to be established and reviewed and updated every 12 months by the company and/or its operators. Revised versions to be	Confirming that Emergency Management Plans (including Bushfire Management) will be in place. Section 6.7 of the EIR details that these will be reviewed every 12 months at a minimum, which aligns with the review	EIR Section 6.7; EIR 5.3.10 #SAF02; SEO Objective 7.

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		forwarded to the relevant SACFS Regional Office to use as a reference. During the construction and decommissioning phases and whilst undertaking maintenance, proponents should provide the provision of basic fire-firefighting equipment at each site, including fire extinguishers, knapsacks, and other equipment suitable for initial response actions. SACFS as the referral agency, reserves the right to request additional information and provide further comment, under the Planning Development and Infrastructure Act and Regulations, in particular, but not limited to Regulation 45 (3) during the Building Rules approval process.	period nominated by the SA CFS. Control measures in Impact #SAF02 of the EIR and Objective 7 has been updated to reflect this. The requirement to supply these plans to the relevant SACFS Regional office (including any revisions) is noted, and has been included under Section 6.7 of the EIR. Incorporation of basic fire-fighting equipment at each met mast location during construction, decommissioning and maintenance activities will be included in the Operational Management Plan.	
DEW	EIR/SEO	DEW advises that it had the opportunity to provide Revera Energy with comments on an early draft of the EIR and SEO. DEW confirms that these comments have been addressed by the applicant in these latest draft documents.	Noted	N/A
DEW	EIR (pp10 - 11)	The exact locations, clearance requirements and number of met masts is yet to be determined by the applicant. Until this information is known DEW cannot fully assess the potential impact or whether the proposed mitigation measures are appropriate. The applicant has advised in the EIR that met masts sites are proposed to be sited within cleared paddocks to avoid native vegetation where possible. The EIR also references that an inspection for native vegetation will be carried out at each proposed met mast site and clearance applications sought from the Native Vegetation Council if required. DEW seeks clarity on whether this inspection will	While micro-siting of the met masts is yet to occur, the EIR document (and permit application) confirms that between 1 -3 met masts will be sited within the land parcels identified in the application and EIR. Revera confirms that per the SEO and EIR Impact #BIO01: "*All biodiversity data collected by an appropriately qualified professional and reported to the Biological Databases of South Australia and DEM*	N/A

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		be carried out by a suitable qualified professional and that this inspection will include impacts on flora and fauna? DEW can provide support to the applicant in considering biodiversity values for the final siting of the met masts and can further assess potential impacts and appropriateness of mitigation measures once these details are known. DEW requests detailed site plans and information in order to assess this further prior to construction approval.	*pursuant to HRE Regulation 32(2)(c)..*", and this data will be assessed and include potential impacts on flora and fauna . Noted. Revera will need to prepare and supply an Operational Management Plan (OMP) to DEM for approval prior to any construction works, which will contain the confirmed final location/s and site assessments, including ecological assessments and surveys. A copy of the OMP can also be supplied to DEW.	
DEW	N/A	Biodiversity Values DEW's preliminary biodiversity values analysis shows that the area contains several biodiversity values including nationally and state listed species. DEW suggest early discussion on biodiversity considerations to inform the final siting of the met masts. Further survey work is required to inform the siting and design of the wider Cape Hardy Green Energy Project whose footprint will have a much greater area of disturbance. HRE Regulation 32(2)(c) requires that an EIR must contain: data relating to biodiversity within the area of land to which the report relates that can reasonably be expected to be affected by authorised operations. DEW advises that the applicant will be required to submit	Noted.	N/A

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		biodiversity data collected throughout the project, via on-ground surveys.		
DEW	N/A	DEW has previously advised the applicant that DEW can assist with biodiversity mapping in order to consider siting of met masts and invited the applicant to make contact with DEW's Science and Information team on [redacted]	On 21 February 2025, DEW advised: "*DEW welcomes future engagement regarding this project by Amp and the Department for Energy and Mining. We reiterate that on request, relevant DEW officers can work with Amp to support the identification of biodiversity values/considerations to assist Amp to meet its legislative obligations under the HRE Act and other relevant legislation.*" Subsequent to this advice in early 2025, Revera, through the DEW assigned contact in Planning & Assessment has contacted and met with the wider DEW teams regarding the met masts on 4 April 2025. Revera would be pleased to meet with DEW again once micro-siting of the met masts is further progressed – whether this is with the wider DEW teams, or with the Science and Information team directly.	N/A
DEW	EIS – Impact ID B1003 72	DEW is supportive of the control measure: "*Significant areas for native fauna (including but not limited to nesting areas for water birds) are identified during the planning process and are avoided, either spatially or temporally*."	Noted.	N/A

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		With regard to this control measure, DEW would like to mention the following birds of prey: Wedge-tailed eagle (NPW Act protected), Square-tailed kite (NPW Act endangered) and Little eagle (NPW Act vulnerable) in particular. While these species have not yet been identified within the threatened fauna searches of the two precinct areas (EIR, Table 4-4, Figure 4-10, Tables 4-5 and 4-6) they are known to occur in nearby areas. Applying what is known about the species distribution and/or typical breeding home ranges needs, it's foreseeably that some or all these species overlap parts of the two project precincts. Similarly, however with less understanding of their movements, DEW raises Grey headed flying foxes (EPBC Act vulnerable and NPW Act protected), a species which in recent months has been observed across Eyre Peninsula (e.g. SA Power Networks have control measures in place for infrastructure they manage). DEW suggests the Grey Headed Flying Fox is considered in the EIR given this recent activity in the region.	The species mentioned are noted but at this stage are not considered specifically for inclusion in the EIR as it is considered the Environmental Significance Assessments for Flora, Fauna and Biodiversity adequately cover the management of potential risks of species that have not (or not yet) been found in the region. Impact #BIO04 of the EIR related to Flora, Fauna and biodiversity specifically contemplates migratory species and is not exclusive of species that have not (or not yet) been observed in the two precinct areas. Revera reiterates that per Impact ID #BIO01 and the proposed leading criteria: "*Prior to undertaking regulated activities, appropriately trained and experienced personnel have assessed or scouted proposed project area and have identified and flagged significant (or rare, vulnerable or endangered) species and communities";* and assessment criteria regarding #BIO04: *"Records of audits/inspections carried out in accordance with the OMP (e.g. ecological assessments and clearance data) demonstrate significant habitat for listed threatened or migratory species has been avoided."*	

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
			In summary, Revera will need to prepare and supply an Operational Management Plan (OMP) to DEM for approval prior to any construction works, which will contain the confirmed final location/s and site assessments, including ecological assessments and surveys in line with the above. A copy of the OMP can also be supplied to DEW.	
DEW	EIS – Impact ID BIO04 Pg 72	DEW is supportive of the control measure: "*Design and engineering controls are put in place to avoid threatened and migratory species and their habitats as much as reasonably practicable*." While not 'a result of collision' directly, DEW questions whether consideration is being given to the design on how to prevent birds of prey from establishing nests on the met masts? Met masts may make for attractive nest sites. Within the region DEW is aware of examples of Osprey nests being built on communication towers, a range of birds of prey nests been built on high voltage transmission lines, all of which become problematic for the proponent and the birds involved. If possible, avoiding this type of new infrastructure being used by birds as a new nest site in the first instance would be desirable.	While nesting has not been an issue with met masts, based on prior experience of Revera staff in other regions, this has been considered in the design and operation of the mast/s. Revera has confirmed with our met mast supplier, who has had noted knowledge regarding ospreys and nesting requirements that the planned design of "*our masts do not have enough room inside the lattice for them to be comfortable to make a nest inside. The mast top has a riser in the middle so there is not enough flat area for an osprey to nest"*. If required, Revera's met mast supplier can supply either physical or optical bird deterrents as control measures to reduce the risk of potential birds nesting in the mast. Inspection of the temporary masts for the	N/A

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			presence of birds and nests will also be incorporated into maintenance checks and site inspections of the area throughout the permit period, and will be noted in the Operational Management Plan (OMP) which will be supplied to DEM. A copy of the OMP can also be supplied to DEW.	
DEW	EIR Table 4-4, 4-5, 4-6, Section 4.4.2, Figure 4-8	Threatened Fauna General comment related to threatened fauna (EIR, Table 4-4, Figure 4-10, Tables 4-5 and 4-6) and flora EPBC threatened ecological communities (Section 4.4.2, Figure 4-8): Due to the low survey effort and low number of opportunistic records held within databases for the project precinct areas it is likely that, as environmental survey work is undertaken these lists will expand. By way of example, DEW anticipates potentially wombat, microbat, and reptile species richness to be higher with the precincts than what appears currently in the desktop data retrieval	Noted. Please refer to EIR - Impact Assessment #BIO01 and the proposed leading criteria: "*Prior to undertaking regulated activities, appropriately trained and experienced personnel have assessed or scouted proposed project area and have identified and flagged significant (or rare, vulnerable or endangered) species and communities";* and assessment criteria regarding #BIO04: *"Records of audits/inspections carried out in accordance with the OMP (e.g. ecological assessments and clearance data) demonstrate significant habitat for listed threatened or migratory species has been avoided."* Revera will need to prepare and supply an Operational Management Plan (OMP) to DEM for approval prior to any construction	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
			works, which will contain the confirmed final location/s and site assessments, including ecological assessments and surveys in line with the above. A copy of the OMP can also be supplied to DEW.	
DEW	N/A	Native Vegetation In relation to any clearance of native vegetation that is associated with this project, approval will need to be sought from the Native Vegetation Council in accordance with the Native Vegetation Act 1991, and its regulations.	Noted. Revera advises that the EIR contains the commitment to avoid constructing the met masts within areas which require native vegetation clearance, in the first instance. In the unlikely event this cannot be avoided, these documents (EIR Impact ID #BIO01) and the SEO (Objective 2) also include the commitment to ensure that the relevant approvals/permits from the Native Vegetation Council will be sought and in place prior to any native vegetation clearance works, in line with the request noted here.	N/A
DEW	EIR Pg 17, Appendix A – pg 122	Surface water It is noted that the Hincks Conservation Park is located on the north boundary of the project area and won't be accessed as part of this project. The project area is not within any prescribed surface water area or contains any prescribed watercourses. The Tod River catchment is south-west of the project area and includes a defined 'Water Protection Area'. Based on Figure 4-2 of the EIR, the Moody Ungarra Precinct and Cape Hardy Precinct appear outside the Tod River catchment Water Protection Area.	N/A	N/A

Stakeholder	Draft Document	Stakeholder Comment	Revera Response	Document Section Amended
		No surface water monitoring sites are located within the Project Area. Tod River gauging station (A5120500) is around 30km south-west of the Project Area. As the final met mast locations are not known DEW notes that only a number of 'suitable' installation parcels within the Project Area are identified. It is further noted that the applicant will avoid surface water features ephemeral drainage lines (Pg 122 EIR Appendix A) for met mast locations as well as a minimum of 100m from surface water features and have a small base footprint area of only a few metres square.		
DEW	EIR, Pg 20	Groundwater DEW advises that there is a minor risk of shallow groundwater contamination from construction works that will be required to be monitored. DEW notes that there is no detail on the source of water for concrete batching, the source of water needs to be included in the EIR	Section 4.3.2 of the EIR notes that the "*depth to the shallowest aquifer is variable across the locality and is generally deeper than 20 m below the soil surface (SARIG, 2024)*" and based on the construction works and materials to be used for construction, there is no S-P-R linkage between construction and groundwater. Notwithstanding, once micro-siting of the met masts has occurred, the known groundwater depths in the area, and in areas within the vicinity will be checked to confirm this understanding and incorporated in to the OMP. Section 3.2.1 of the EIR notes that concrete batching (and therefore a water source for it) may/may not be required depending on the final site conditions. Concrete batching may	N/A

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			occur on site, or pre-fabricated concrete forms may be used. Notwithstanding, if concrete batching is to occur during construction, water will be responsibly and legally sourced, and will be fully detailed in the subsequent Operational Management Plan (OMP) submitted for approval to DEM prior to construction. A copy of this OMP can also be supplied to DEW.	
DEW - Freshwater aquatic ecology	N/A	No comment in regard to aquatic ecology although DEW requests the applicant make contact with the Department's Water Science and Monitoring Branch on email: [redacted] to this area of the project in more detail and for the applicant to provide updated spatial layers of the project	Shapefiles of the proposed REFP land parcels have already been provided via email to the DEW Water Science unit on 6 March 2025 through Revera's nominated DEW contact, in follow up to the initial request in February 2025. There are no additional or updated spatial layers at this point in time. If the spatial layers are updated in future, Revera will advise DEW and would be pleased to provide these to the email address nominated.	N/A
DEW – Heritage Unit	EIR, 38	DEW reiterates previous comments provided to the applicant at the pre-lodgement stage that on the basis that the met masts will be located within cleared paddocks there will be no heritage impact on the Water Tank at Moody Rocks, Moody Tank Conservation Park (SHP 14249).	Noted	N/A

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DEW – Coast Unit		DEW notes and supports that following the previous round of consultation at pre-lodgement stage, the four coastal parcels originally identified have been removed from the REFP application, resulting in no met masts on the coastal parcels and no application of the Coast Protection Act. As a result DEW has no further comment in relation to coastal matters.	Noted	N/A
Native Vegetation Council	N/A	Under the NV Act, the Council cannot act in any manner that is Seriously at variance with the Principles of clearance, and, therefore, it cannot give approval to proposed clearance that is Seriously at variance. As there is no Data Report, the Council is unable to verify whether the proposed clearance would be Seriously at variance with the Principles of clearance.	Noted. Revera highlights met masts are to be constructed within freehold agricultural paddocks, and the EIR contains the commitment to avoid constructing the met masts within areas which require native vegetation clearance, in the first instance. In the unlikely event this cannot be avoided, these documents (EIR Impact ID #BIO01) and the SEO (Objective 2) also include the commitment to ensure that the relevant approvals/permits from the Native Vegetation Council will be sought and in place prior to any native vegetation clearance works, so that an assessment of the proposed clearance works can be undertaken.	N/A
Native Vegetation Council	N/A	There are three Native Vegetation Heritage Agreements in the Moody Ungarra Precinct. A buffer area of at least 50 m is to be provided around the land covered by these agreements. As the Precinct is adjacent to public protected areas, the Council recommends noting the public protected area buffer as well.	Noted – and the public protected area adjacent to the Moody Ungarra Precinct (Moody Tanks Conservation Park) has a listed buffer of 500m, which is included in 3.1.1 of the EIR. The Native Vegetation	3.1.1 EIR

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			Heritage Agreement buffer area of 50m has now also been included in Section 3.1.1 of the EIR.	
Native Vegetation Council	N/A	While the proponent intends to construct met masts in cleared paddocks, this development may still have direct and indirect as well as cumulative impacts on biodiversity. These need to be addressed in the Data Report.	Noted.	N/A
Native Vegetation Council	N/A	When submitting applications for clearance under the Native Vegetation Regulations 2017, the proponents must have regard to, and give effect to, the mitigation hierarchy. In line with the mitigation hierarchy, and as part of the clearance application, the Council will consider whether to include restoration/rehabilitation of temporary tracks and construction zones as a condition of approval.	Noted.	N/A
Native Vegetation Council	N/A	Significant Environment Benefit (SEB) is a condition of approval to clear native vegetation, whereas the SEB must outweigh the value of keeping the native vegetation. As part of the clearance application, the Council will require information about the proposed offset, noting that the Council whenever practical prefers on-ground offsets over payments into the Native Vegetation Fund. The proponent may also wish to consider using services of an accredited third party provider or broker. The proponents are also encouraged to check the Native Vegetation Credit Register to offset the clearance.	Noted.	N/A

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		Under Regulation 12 of the Native Vegetation Regulations 2017, infrastructure applications are risk assessed.		
Native Vegetation Council	EIR Table 5.1, 5.9 and pg 66	The Council is concerned over the assessment in Table 5.1 that 'Regional long term decrease in abundance of some species and / or local loss of some species diversity resulting in some change to the community structure. Local long-term decrease in listed-species abundance without reduction in their regional population viability.' as 'moderate' impact. The Council recommends removing the text 'and / or local loss of some species diversity' as loss of one or more species cannot be assessed as a 'moderate' impact. Please consider adding the Biodiversity Act 2025 to Table 5.9. On page 66, control measures, please consider changing 'Any areas of clearance will be rehabilitated where necessary' to 'Any areas of clearance will be rehabilitated where reasonably possible'.	EIR Table 5 -1 Removed text : '*and / or local loss of some species diversity' as* suggested. Table 5-9 *Biodiversity Act 2025* (once commenced) has been added. The control measure regarding areas of clearance on pg 66 of the EIR has been considered, and wording has remained the same to align with the need to take into account landholder requests and the need to meet all applicable regulatory and legal requirements under legislation and land access and use agreements.	EIR, Table 5-1 EIR, Table 5-9
Native Vegetation Council	SEO, Table 2.1	On page 4, under 2.1 Objectives, the proposed objective is: '*No loss of abundance or diversity of native vegetation and/or fauna unless prior approval under the relevant legislation is obtained*'. As the current wording implies that the objective is to solely comply with the legislation, this could be improved by having adding an objective to adhere to the mitigation hierarchy.	Noted and considered. However, the wording of the environmental objectives, without direct reference to the mitigation hierarchy is consistent with other approved SEOs. However, this has been added to	SEO Table 2-1 : Objective #2, Leading Performance Criteria

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		It is recommended to change: '*No significant impacts to threatened or migratory fauna*' to read '*No significant impacts to threatened flora, or threatened or migratory fauna*'. The Council recommends referring to the mitigation hierarchy in Table 2.1 as well. The Council also recommends adding a reference to rehabilitation in the Environmental objective and assessment criteria, especially since it is referenced within the Leading performance indicator ('Visual inspections are undertaken to ensure that project areas are appropriately rehabilitated.).	Table 2-1, Objective #2's Leading Performance Criteria. Impact to threatened flora is already covered by the existing proposed Objective #2 "*No loss of abundance or diversity of native vegetation and/or fauna unless prior approval under the relevant legislation is obtained*", as the specific assessment criteria covers "*Records (e.g. ecological assessments) demonstrate no listed threatened flora species removed (unless appropriate approval has been obtained).*" Rehabilitation is an aspect specifically covered under Objective #9 on page 10 of the SEO. A note to the Leading Performance Criteria, under Objective #2 has been added for clarity.	