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NEOEN

DECOMMISSIONING MANAGEMENT PLAN

Mount Hopeful Wind Farm

FINAL - ATTACHMENT I

August 2023

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Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Neoen Australia Pty Ltd

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1.0 Introduction

Umwelt was commissioned by Neoen Australia Pty Ltd (Neoen) to develop a Decommissioning Management Plan (DMP) for the Mount Hopeful Wind Farm (the Project). The preliminary DMP is a high-level document that addresses the requirements of Condition 26 of SARA 109-24892 SD below, as well as item 4.1.4 of the DCCEEW RFI (2021 - 9137):

a) Prepare a Decommissioning Management Plan (DMP)

b) The DMP required under part (a) of this condition must:

i) be prepared by a suitably qualified person

ii) address the actions to be undertaken where any or all turbines have permanently ceased operating including, but not limited to:

- removal of above ground non-operational equipment
- removal and clean-up of any contamination caused by the wind farm development as defined in the *Environmental Protection Act 1994*
- rehabilitation/revegetation of storage areas, construction areas, access tracks and other areas affected by the decommissioning of the turbines if those areas are not otherwise useful to the ongoing use of the land
- a consultation program with relevant parties including surrounding landowners

c) Submit the DMP required by part (a) of this condition to Department of State Development, Infrastructure, Local Government and Planning (windfarms@dsdilgp.qld.gov.au)

d) Decommission the wind farm in accordance with the DMP.

Note: Suitably qualified person means a person(s) who has professional qualifications, training, skills and / or experience relevant to area of expertise (decommissioning large scale industrial developments).

1.1 Purpose and Objectives

The purpose of this DMP is to provide a plan for the management of the decommissioning and rehabilitation phase of the Project including identification of:

- The existing environment and conditions of the site.
- Decommissioning methodologies for turbines and turbine infrastructure, removal of concrete footings, removal of site services including power, water and any supporting pipelines/infrastructure not proposed to be retained as part of the final land use for the site.
- Environmental impact management including management of traffic throughout the decommissioning process.
- Predicted waste streams and appropriate management measures.

- Rehabilitation objectives relating to landform, soil quality and biodiversity.
- Conceptual timeline for the decommissioning of site infrastructure and completion of the rehabilitation program.

This DMP has been developed based on the assumption that the Project will be decommissioned at the end of the anticipated 30 years operational timeframe. If repowering the wind farm is not considered to be a viable option, then the Project will be decommissioned in accordance with this DMP.

This plan aims to demonstrate a commitment to ensuring appropriate environmental management is undertaken during the decommissioning and rehabilitation phase in accordance with legislative requirements, conditions of consent, stakeholder interests and industry best practice. This plan will continue to be reviewed throughout the life of the Project.

1.2 Overview of the Development

1.2.1 The Proponent

The Proponent for the Project is Neoen. Founded in 2008, Neoen is an independent producer of sustainable energy. Neoen has a diverse power generation portfolio including solar and wind farms, biomass congregation plants and battery storage facilities. Neoen is one of the largest international private owner and operator of renewable energy assets and is looking to further expand this position by exploring a suite of low emission and renewable energy generation development opportunities across Australia.

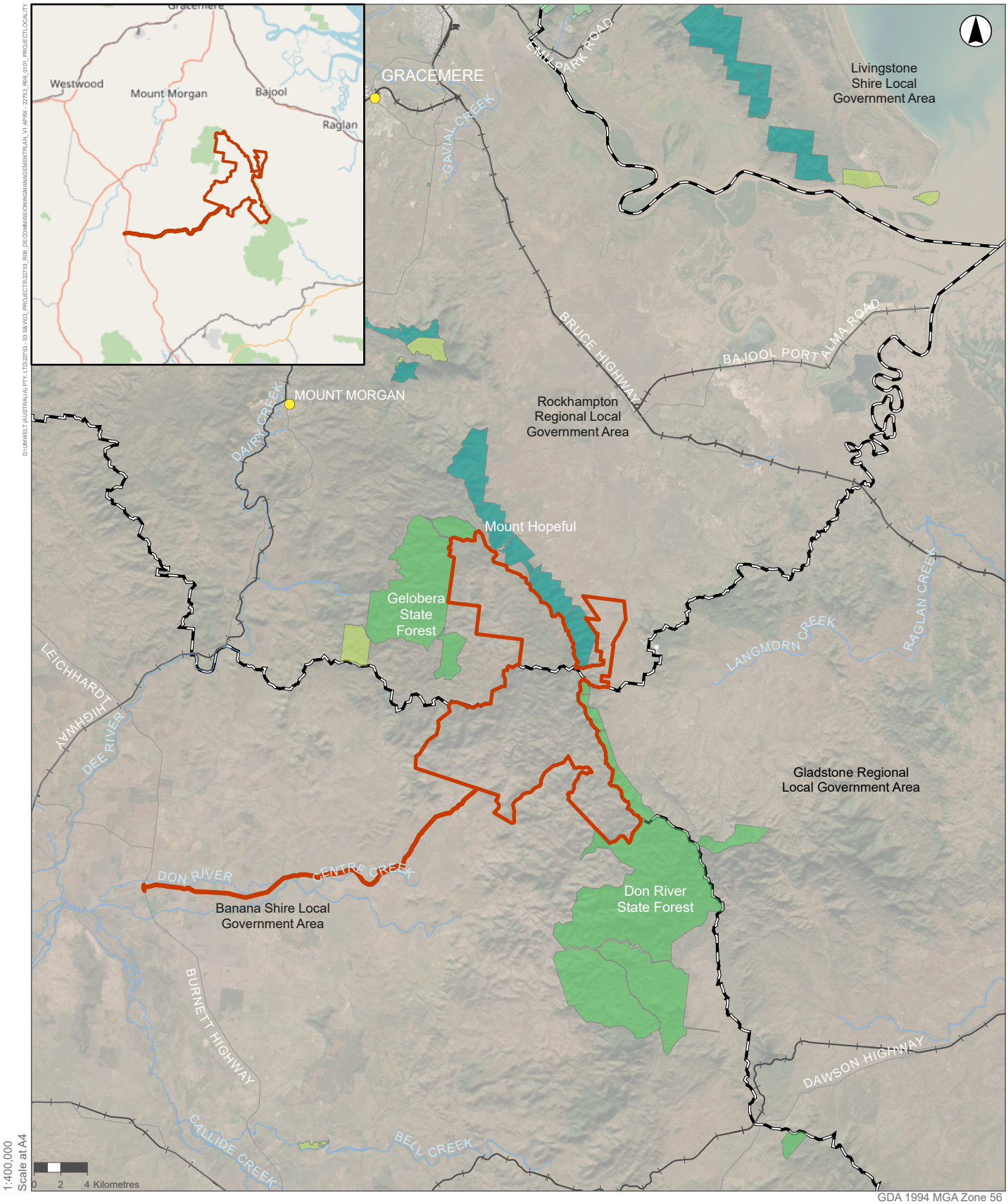
1.2.2 Project Description

The Mount Hopeful Wind Farm is a large-scale renewable energy Project proposed in Central Queensland, within the Rockhampton and Banana Shire areas. It is located 13 km southeast of Mount Morgan and is situated within the localities of Bajool and Ulogie (refer to **Figure 1.1**). The Project will be developed on 17 freehold land parcels and will also utilise a number of local road reserves and a small portion of an adjacent land parcel, having a combined area of approximately 16,975.8 hectares (ha). These areas are collectively referred to herein as the 'Study Area'.

The Project involves the development of a wind farm that contains 63 wind turbine generators (WTGs), gravel capped roads and ancillary infrastructure including up to ten temporary and ten permanent wind monitoring masts, substations, battery energy storage systems (BESS), a temporary worker's accommodation camp, temporary construction compound/laydown areas, high voltage (275 kV) overhead powerlines, as well as underground and/or overhead power and communication cables. The Project includes an access road corridor which would involve upgrades to approximately 30 km of existing road between the Burnett Highway at Dixalea and Glengowan Road to ensure the safe transportation of Project infrastructure. The Project is expected to have a maximum generation capacity of approximately 400 megawatts (MW).

The Project is expected to operate for 30 years. After the initial 30-year operating period, the wind farm would either commence:

- decommissioning and rehabilitation
- a program to replace turbine infrastructure on an as-needed basis (subject to necessary approvals; or
- refurbishment of existing infrastructure to prolong turbine life (again, subject to necessary approvals).



Legend

- Town
- Roads
- Railway
- Watercourses
- Local Government Area (LGA)
- Study Area
- Conservation Park
- National Park
- Resources Reserve
- State Forest

FIGURE 1.1

PROJECT LOCALITY

Image Source: ESRI Basemap (2022) **Data source:** Department of Resources (2022)

1.3 Existing Environment

As the Study Area runs along the western edge of Dee Range and Ulam Range and extends west to valleys, the general topography is rugged with elevation ranging from 500 m Australian Height Datum (AHD) to 120 m AHD. There are several prominent hills and mountains within the Study Area, namely Mt Helen at 633 m (east), Mt Isabel at 508 m (east), Mt Gelobera / Reilly's Hill at 539 m (west), and North Pimple at 454 m (centre). The land surrounding the Study Area is also steep, with several other prominent mountains nearby (including Mt Hopeful at 634 m to the north).

The Study Area is located in a largely rural and sparsely settled landscape that is mostly used for light grazing and livestock production. The closest localities are Fletcher Creek, Wura, and Oakey Creek. There are no protected areas within the Study Area, however there are several adjacent to or in the surrounding areas, including Gelobera State Forest, Ulam Range State Forest, Don River State Forest, and Mount Hopeful Conservation Park.

There are two residential dwellings located within the Project boundaries (one in the south-west and one in the north), with an additional seven dwellings within a 6 km radius of the closest Project boundary. There are eight mapped dams in the south-west of the Study Area and numerous watercourses across the Study Area. These watercourses contain regulated vegetation which is mapped as matters of state environmental significance (MSES). Many of the watercourses are ephemeral, unnamed streams.

Major highways in proximity to the Study Area include the Bruce Highway to the east, Burnett Highway to the west, and the Dawson Highway to the south. These major transport corridors link to the cities of Rockhampton and Gladstone, as well as the Port of Gladstone from which the proposed turbine components will be transported. Access to the Study Area is primarily via Burnett Highway located to the east of the Study Area, as well as lower order roads in Banana Shire Council including McDonalds Road, Playfields Road and Glengowan Road.

2.0 Statutory Framework

2.1 Commonwealth Legislation

2.1.1 Environment Protection and Biodiversity Conservation Act 1999

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

On 7 March 2022 the delegate for the Minister for the Environment determined that the Proposed Action was a 'controlled action' requiring assessment by Preliminary Documentation and approval under the EPBC Act before it can proceed. Section 4.1.4 of the Preliminary Documentation RFI requests the DMP be appended to the documentation.

2.2 State Legislation

The Project received planning approval from the QLD State Assessment and Referral Agency (SARA) on 17 June 2022. The approval relates to State Code 23 (Material Change of Use for a Wind Farm) and State Code 16 (Clearing Native Vegetation).

The purpose of the State Code 23 is to protect individuals, communities and the environment from adverse impacts resulting from the construction, operation and decommissioning of wind farm developments.

The purpose of the State Code 16 is to ensure development avoids clearing, or where avoidance is not reasonably possible, minimises clearing to: conserve vegetation, avoid land degradation, avoid loss of biodiversity, and maintain ecological processes.

2.2.1 SARA Decision Notice 2109-24892 SDA Conditions of Approval

Condition 26 of SARA Decision Notice 2109-24892 SDA indicates that a Decommissioning Management Plan should:

- Address the actions to be undertaken where any or all turbines have permanently ceased operating including, but not limited to:
    - Removal of above ground non-operational equipment.
    - Removal and clean-up of any contamination caused by the wind farm development as defined in the *Environmental Protection Act 1994*.
    - Rehabilitation/revegetation of storage areas, construction areas, access tracks and other areas affected by the decommissioning of the turbines is those areas are not otherwise useful to the ongoing use of the land.
    - A consultation program with relevant parties including surrounding landowners.

2.2.2 Environmental Protection Act 1994

The *Environmental Protection Act 1994* (EP Act) lists obligations and duties to prevent environmental harm, nuisances, and contamination. The EP Act also sets out enforcement tools that can be used when offences or acts of non-compliance are identified. The two primary duties that apply to all parties in Queensland are the general environmental duty and the duty to notify of environmental harm.

All operations occurring within the Project are undertaken in accordance with the EP Act.

2.2.3 Environmental Protection Regulation 2019

The Environmental Protection Regulation 2019 prescribes the detail for processes contained in the EP Act. For example, the regulation contains the categorisation of waste that will be used to inform waste management practices during the decommissioning of the Project.

3.0 Methods of Decommissioning

This section of the DMP focusses on current methods that may be used during the decommissioning phase of the Project and decommissioning of individual wind turbines. At the end of the 30-year Project life, wind farm infrastructure will be dismantled and removed, with the land being rehabilitated to a condition similar to pre-development conditions and in accordance with the Project Approval, Lease agreements and the Rehabilitation Management Plan (RMP).

The following infrastructure is expected to have the potential to remain on-site and be repurposed for use where appropriate and in agreement with the future landowner:

- The high voltage 275 kV overhead powerlines will not be decommissioned as it will remain an asset owned by Powerlink as the Transmission System Operator.
- Wind farm access road infrastructure on private land may be retained for on-going use by the landowners as agreed during lease negotiations.
- Site fencing to be re-purposed as agricultural infrastructure for on-going use by the landowners.
- General Project landscaping.
- The Project's substations.

Other infrastructure which may be requested by landowners to be retained in the future will be identified in the subsequent revisions to this DMP.

After removal, the wind turbine generators will be either scrapped or transported to another site for resale or reuse. These methods will be evaluated closer to the end of the operational life, to ensure the appropriate technology is utilised. The Waste and Resource Management Hierarchy will be followed to assist in the evaluation of these waste methods and help to achieve best practice waste management. More information regarding Waste Management is detailed in **Section 4.0**.

The following sections summarise how the remainder of the wind farm equipment and infrastructure is proposed to be decommissioned. The approach described here including the extent of decommissioning and any associated works will be re-visited and confirmed in detail during the operational phase of the Project, during revisions of the DMP and during the pre-decommissioning consultation process. This will include discussion with and agreement of landowners.

3.1 Wind Turbines

Each wind turbine will be de-energised and disconnected from the Projects internal network prior to its decommissioning. The rotor of each turbine will be locked into position according to the relevant manufacturer's decommissioning instructions. Following the de-energising of the wind turbine, the components will have all liquids (oils, lubricants, coolants etc.) stored and disposed in accordance with relevant legislation. The turbine will be disassembled using a crane and other heavy machinery and tools in accordance with the manufacturer's approved decommissioning instructions. External items located near the base of the tower including the transformer and switchgear will be separated from their foundations ready for removal from site.

The wind turbine generators will be dismantled using typical environmental and safety management practices in place at the time and undertaken in accordance with the DMP.

3.2 Concrete Foundations

Each wind turbine tower would be erected on a concrete and steel footing. Given the significant amount of disturbance caused on site if the footings were to be excavated and removed, it is anticipated that each wind turbine foundation (involving approximately 500 m^3 of reinforced concrete) will be left in situ and covered in clean fill material to a depth of 1 metre. The area will be graded to reflect the slope of the surrounding area, dressed in appropriate topsoil, and seeded or planted with appropriate grasses and vegetation to reintegrate it with the surrounding environment and minimise the risk of soil erosion.

3.3 Site Services including Power and Water

All overhead power line poles and conductors connecting the Project to the substation will be removed from the site. As far as possible and in accordance with the waste hierarchy, all materials and components (e.g., steel, conductors, switches, transformers, etc.) will be reused, sold as scrap, recycled, or re-purposed to improve environmental outcomes of the Project. At some locations, it may be considered that removing the transmission line poles poses a higher degree of environmental risk. In this instance, the powerline pole may be cut at the base, flush with the ground level.

It is anticipated that underground electrical reticulation cabling and associated infrastructure, which connect the wind turbines to the on-site substation, will be left in situ dependent upon their depth below the surface. The cables and conduits contain no materials known to be harmful to the environment, and the process of digging up and removing the underground cabling is considered to have a greater impact on the surrounding environment than leaving them in place. Nevertheless, the value of materials that could be recovered will be assessed relative to costs of leaving the cabling in the ground.

Should removal be required for any reason, cabling will be removed in a way that minimises impacts on the environment. Disturbed areas will be adequately backfilled and graded to match the slope and contour of the surrounding land. The disturbed areas will then be revegetated to prevent soil erosion and reintegrated within the surrounding environment.

All waste which cannot be reused shall be classified in accordance with the Environmental Protection Regulation 2019. More information regarding Waste Management is detailed in **Section 4.0**.

3.4 Access Tracks

Access tracks and access roads may be retained, subject to landowner requests and feedback throughout the decommissioning consultation process. The access road on Playfields, McDonalds and Glengowan Roads is an upgrade to the current road and will be retained post decommissioning of the wind farm. Where removal / remediation of the roads and access tracks is required, gravel will be removed from access roads and treated accordingly. The primary objective will be to reuse wherever possible (either on or offsite), with alternatives such as disposal offsite at a pre-approved location. Hardstand areas will be removed, and ground rehabilitated in accordance with the site RMP. Crane hardstands and construction laydown areas will consist of an all-weather base and will be constructed in a similar way to access roads. Located next to each wind turbine, crane pads will be cleared and levelled suitable for operating a large crane.

3.5 Other Ancillary Infrastructure (Site Office and Car Park)

The site office and carpark will be demolished and removed, in accordance with standard demolition practices. Footings for any demolished site buildings would be left in place and rehabilitated in accordance with the principles set out for the concrete foundations (as above in **Section 3.2**). The associated storage compound and car parking, constructed in a similar way to the hardstands and access road will be removed/rehabilitated in the same way as described in **Section 3.4**.

3.6 Traffic Management

All WTGs will be dismantled onsite and processed into smaller components to allow for easier transportation, either for re-use, or recycling/disposal. If the pieces cannot be transported off site immediately, they will remain on site on the existing hardstand and/or road areas or a temporary lay down area. Any ground disturbed by the creation of the lay down area would be temporary and would be rehabilitated following decommissioning.

Transport of Project infrastructure and components will be undertaken in accordance with the Transport Impact Assessment and Traffic Management Plan required to be prepared under condition 21 of SARA 109-24892 SD. Consultation with the relevant road authorities at the time will be undertaken to ensure that concerns are addressed, and agreement reached in relation to any road upgrades or dilapidation requirements.

4.0 Waste Management

4.1 Waste Management

All resource recovery strategies and the management of waste streams generated during decommissioning will be guided by the principles of the waste and resource management hierarchy, where emphasis is placed upon reduce, reuse, recycle prior to disposal of its wastes. Appropriate and best-practice waste management will be implemented as part of the Project in accordance with the following legislation and guidelines:

- *Environmental Protection Act 1994.*
- Environmental Protection Regulation 2019.
- *Waste Reduction and Recycling Act 2011.*
- Waste Reduction and Recycling Regulation 2011.

The *Waste Management and Resource Recovery Strategy 2019* outlines best practice waste management which involves implementation of the waste and resource management hierarchy principles (see **Figure 4.1**). The waste and resource management hierarchy will be applied wherever possible to all decommissioning wastes.

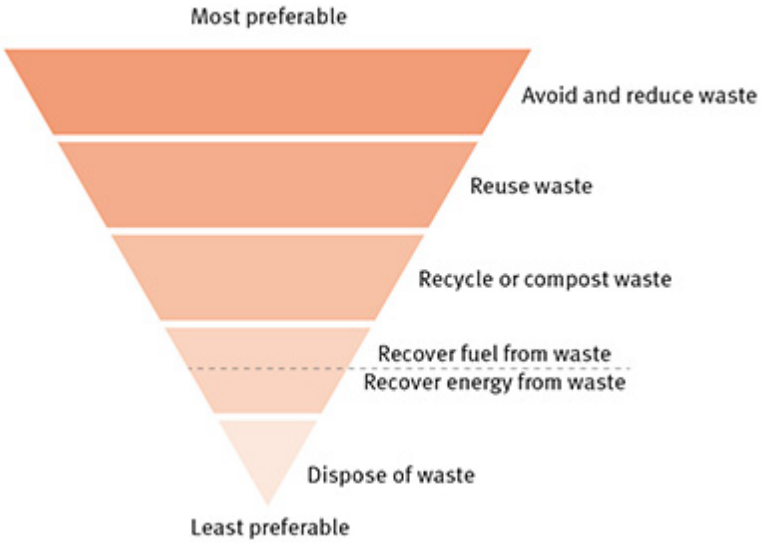


Figure 4.1 Waste and Resource Management Hierarchy

Neoen will be responsible for the development and implementation of the DMP including compliance by contractors and staff.

4.2 Predicted Waste Streams

The Environmental Protection Regulation 2019 (the Regulation) includes a risk-based waste classification framework where regulated waste is classified as either:

- Category 1 regulated waste (highest risk).
- Category 2 regulated waste (moderate risk).
- Not-regulated waste/general waste (lowest risk).

The potential waste types expected to be generated by the Project during the decommissioning phases are included in **Table 4.1** and are assessed in the context of the above guidelines and regulations.

Table 4.1 Likely Decommissioning Materials

Expected Material Type	Waste Categorisation	Expected Quantity	End use
Green waste from removal of infrastructure above and below ground	Not-regulated waste/general waste (lowest risk)	Low	Reuse on-site where appropriate or recycled
Landscaping		Low	Remain in situ
Waste oils, lubricants, liquids and paints	Category 2 regulated waste (moderate risk)	Low	Transported to licenced facility
Sewage ablutions or portaloos	Category 2 regulated waste (moderate risk)	Low	Transported to licenced facility
Electrical cabling	Not-regulated waste/general waste (lowest risk)	Moderate	Recycled
Inverters	Not-regulated waste/general waste (lowest risk))	Moderate ~67 units	Recycled
Access Roads	Not-regulated waste/general waste (lowest risk)	Moderate	Remain in situ subject to consultation with local landowners
Domestic waste	Not-regulated waste/general waste (lowest risk)	Low	Recycled If not possible, dispose at suitable land fill facility
Wind turbine generators	Not-regulated waste/general waste (lowest risk)	Moderate	Reuse or Recycled
Wind turbine conductors, switches and transformers	Not-regulated waste/general waste (lowest risk))	Moderate	Recycled
Wind turbine blades	Not-regulated waste/general waste (lowest risk)	Moderate	Composite Material Recycling Methods (**Table 4.2**)

Wind turbine blades are typically constructed of a composite material that is inherently difficult to recycle, requiring a complex recycling process to break down their material composition. **Table 4.2** outlines the current processes available for recycling composite materials.

Table 4.2 Composite Material Recycling Methods

Method	Description
Mechanical	The composite is broken down by shredding, crushing, or milling. The final materials can be separated into resin and fibrous products.
Pyrolysis	The composite is heated to a temperate between 450°C to 700°C in the absence of oxygen. The polymeric resin is converted into a gas or vapour while the fibres remain inert and can later be recovered.
Oxidation in Fluidised Bed	The polymetric matrix is combusted in a hot and oxygen-rich air flow between 450°C to 550°C.
Chemical	The polymeric resin is decomposed into oils which free the fibres for collection.

Source: Cherrington et al 2011.

The appropriate method for recycling wind turbine blades will be determined closer to the decommissioning period. Waste produced during decommissioning provides an opportunity to continue beneficial outcomes associated with the Project by contributing to regional or nationwide circular economy objectives and prioritising the reuse or recycling of all materials. The location of scrap metal merchants and other recycling and disposal facilities to be used will be determined closer to the time of decommissioning.

Where waste cannot be reused or recycled, it could cause a reduction in local land capability and so will be collected by an appropriately licensed transporter and disposed of at an appropriately licenced facility with adequate capacity.

5.0 Consultation Prior to Decommissioning

Neoen will continue to engage with community stakeholders in accordance with the Stakeholder Engagement Guide (DSDILGP, 2021) in the decommissioning phase of the Project. Stakeholders will include all relevant groups and individuals engaged during the Project approval phase, plus any additional stakeholders identified during the development process with an interest in the Project.

Engagement activities will include:

- Regular updates to the Project website.
- Distribution of information sheets, fact sheets and/or FAQs to the local community.
- Face-to-face meetings and Project briefings.
- Regular community surveys.
- Operation of a community enquiry line/complaints line and the provision of timely responses to feedback, enquiries, and complaints by Neoen.

The consultation process will be open and transparent and Neoen will seek to present the nature of the proposed decommissioning works, including the turbine dismantling procedure and the proposed land rehabilitation works and objectives and provide a clear timeline of the proposed decommissioning works.

6.0 Rehabilitation

Under condition 13 of the SARA 2109-24892 SDA conditions of approval, a RMP is required to be prepared prior to construction works commencing. The RMP is to detail the rehabilitation goals and objectives of the Project, site rehabilitation plans, the rehabilitation strategy to achieve the rehabilitation goals and objectives and a maintenance period of at least 5 years.

The RMP would likely include the following key elements:

- Consultation with stakeholders to establish desired outcomes and rehabilitation criteria.
- Progressive and/or staged rehabilitation of disturbed areas during decommissioning including:
    - Backfilling of all trenches and excavations to maintain existing or desired future landform.
    - Laying of topsoil where required for future use including continued agricultural us.
    - Revegetation with native species where suitable to allow continued agricultural use of the site or other agreed future land use.
    - Reseeding of areas of pasture/crop dependent on ongoing agricultural use.
- Performance criteria.
- Monitoring.

The overall objective of the rehabilitation activities will be to return the site to pre-construction conditions, however specific rehabilitation outcomes will be developed in consultation with the landowners prior to the decommissioning process. The likely disturbance footprint associated with decommissioning will be smaller than that of the construction phase with only hardstand areas, access tracks and swept paths requiring clearing or pruning to remove infrastructure from the site. Many of the design avoidance mechanisms employed in the early phases of the Project will also reduce rehabilitation requirements following decommissioning.

In development of further iterations of the DMP and the RMP, a review of the statutory context would be required to identify any changes and additional legislation and guidelines that may be relevant to the management of landform, soil quality and biodiversity. Additional survey work may be undertaken as part of preparation of the RMP, further reviews of the DMP and prior to any clearance of vegetation on site excluding agricultural crops and weeds.

7.0 Conceptual Timeline for Decommissioning Activities

Substantial decommissioning activities will commence within six months of turbines no longer generating permanently. It is anticipated that all major onsite decommissioning activities would occur within a period of ten to twelve months. Ongoing site monitoring, maintenance and rehabilitation activities will continue beyond this time.

An indicative schedule of decommissioning activities will be developed in further iterations of the DMP and closer to the decommissioning stage.

8.0 Review

This document will continue to be reviewed by Neoen on a five yearly basis throughout the life of the Project. Elements which will be considered during review of the DMP include:

- Modification to the condition of the Project Approval.
- Changes in environmental conditions.
- Changes in legislation and/or guidelines.
- Improvements in knowledge and/or technology become available.

A copy of the revised and updated DMP will be submitted to the Department of State Development, Infrastructure, Local Government and Planning for approval.

Further iterations of the DMP will include detailed financial assessments and a comprehensive timeline of decommissioning activities.

9.0 References

Cherrington, R., Goodship, V., Meredith, J., Wood, B.M., Coles, S.R., Vuillaume, A., Feito-Boirac, A., Spee, F. and Kirwan, K., 2012. Producer responsibility: Defining the incentive for recycling composite wind turbine blades in Europe. *Energy policy*, *47*, pp.13–21.

Department of State Development, Infrastructure, Local Government and Planning (DSDILGP), 2021. Stakeholder Engagement Guide, Business Case Development Framework. June 2021.

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