Yathroo Wind Farm

Public Comment Response (2025/10390)

Final

September 2026

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Final

Prepared by
Umwelt (Australia) Pty Limited

On behalf of
Neoen Australia Pty Ltd

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Report No.: R33
Date: September 2026

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Umwelt's ISO 9001 certified
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Acknowledgement of Country

Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky.

We pay our respects to Elders past and present.

The below image is from the artwork *Yapung Maryiyang* (Pathway Forward) by Saretta Fielding.



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Document Status

Rev No.	Reviewer Name	Date	Approved for Issue Name	Date
V1	Megan Stalker	17/09/2026	Cormac Collins	17/09/2026

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Appendix A Public Submission

1.0 Introduction

Pursuant to section 95A(3) of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), the public were invited to comment on the draft Preliminary Documentation for the Yathroo Wind Farm Project (2025/10390).

The draft Preliminary Documentation was made available for public comment on Monday 10 August 2026 for a period of 20 business days, up to and including Friday 4 September 2026. Draft Preliminary Documentation was provided online and hard copies were also made available to the public at the following locations:

- Dandaragan Community Resource Centre, 3468 Dandaragan Rd, Dandaragan, Western Australia 6516.
- State Library of Western Australia, 25 Francis St, Perth WA 6000.

This report presents a summary of the submissions received, as well as providing a response. Where relevant, this report also identifies where updates to the Preliminary Documentation have been made in response to public commentary.

1.1 Public Submissions

The Project received one public submission during the notification period. This was received on 4 September 2026.

1.2 Concerns Raised

The public submission received related specifically to the Environmental Offset Strategy and raised concerns regarding the transparency and adequacy of offset calculations, justification of Offset Assessment Guide inputs, anticipated revegetation outcomes, alignment with recovery plans and conservation advice, the absence of an Offset Management Plan from the advertised documentation, and the process for public review of the offset proposal. The full submission is provided as Appendix A.

Since publication of the draft Preliminary Documentation, a detailed Offset Management Plan (OMP) has been prepared to support the next stage of the assessment. The OMP supersedes the high-level Offset Strategy and provides detailed offset calculations, baseline information, management actions, monitoring, completion criteria and adaptive management framework relevant to the proposed offset. As demonstrated in the responses in Table 1.1, matters raised in the submission are addressed through information now presented in the OMP.

1.3 Response to Concerns

The submission received contained a range of individual comments and concerns regarding the proposed offset. As several topics overlapped or were intertwined, the submission has been separated into discrete comments to enable each matter to be addressed. A full response to the concerns raised is provided in Table 1.1.

Table 1.1 Response to Comments

Summary of Comment Received	Response
Separate Offset Assessment Guide calculations were not provided for each impacted black-cockatoo foraging habitat quality. The commenter states it is unclear how the "applied requirement", 'greater net gain' and reported direct offset outcomes were derived.	It is acknowledged that the detailed calculations were not provided in the Offset Strategy. Appendix B of the OMP sets out each Commonwealth Offset Assessment Guide (OAG) input and the rationale for the value applied. Section 4.5.1 and Table 4.2 present the impact quantum and required offset area for each black cockatoo species and habitat quality category, and Appendix C contains the corresponding calculator outputs. The OMP therefore provides a transparent basis for the revised calculation. The NEPA assessment team will review the OMP and determine the final offset requirement as part of the assessment.
The commenter recalculated the direct offset using the published inputs and contends that the area of proposed offset does not achieve a 100% direct offset. On this basis, the commenter considers the estimated offset area unreliable and misleading, and the proposed 19.34 ha offset area inadequate.	The offset calculations have been revised following NEPA feedback on calculator inputs presented in the Offset Strategy. The OMP identifies a Commonwealth OAG direct offset requirement of 22.71 ha for Carnaby's Black-Cockatoo and 10.06 ha for Forest Red-tailed Black-Cockatoo, to offset foraging habitat of quality score 2/10 (Bamford 2020) or greater. The proposed revegetation commitment is 27.25 ha, which is 20% more than the highest calculator-derived requirement of 22.71 ha and provides contingency for revegetation establishment and habitat development. The final offset requirement remains subject to the Commonwealth assessment of the OMP.
The commenter questions the calculator input of 80% for 'risk of loss without offset', suggesting that this would only apply if the paddock tree clearing is authorised or exempt under Western Australian native vegetation clearing requirements. The commenter considers that a 0% risk of loss with and without offset should apply unless clearing is exempt or authorised.	The offset calculations presented in the Offset Strategy have been revised for preparation of the OMP following NEPA feedback. The Commonwealth OAG calculation now applies 0% risk of loss without the offset and 0% risk of loss with the offset, based on NEPA advice. The risk of loss value for the Commonwealth OAG calculator no longer considers potential future paddock-tree clearing. It is noted that NEPA will undertake independent offset calculations following review of the OMP, which will determine the final offset requirement.
The commenter states that the Offset Strategy fails to demonstrate the scientifically robust or precautionary basis for selecting a 15 year timeframe to achieve a self-sustaining Marri woodland community to provide black-cockatoo foraging benefits.	Published studies from south-west Western Australia demonstrate that revegetation with Marri and Proteaceous species (Banksia, Hakea) can begin providing black cockatoo foraging resources within the first decade following establishment, with feeding by black cockatoos recorded within 7-8 years of revegetation (Doherty et al. 2016; Lee et al. 2013). The studies also indicate that habitat values increase progressively as revegetation matures and support the use of a 15-year monitoring period as a precautionary and ecologically realistic timeframe for demonstrating progression toward a self-sustaining Marri woodland ecosystem.

Summary of Comment Received	Response
	The 15 year timeframe has also been determined in consultation with a local revegetation consultant, who confirmed that the timeframe is precautionary based on their observations of 5-year old revegetation providing foraging value within 3-5 years of seeding, and reaching self-sustainability within 10 years.
The commenter states that the Offset Strategy fails to demonstrate evidence that the proposed revegetation can achieve the nominated Marri or Banksia woodland foliage cover within the stated timeframe of 15 years.	Since preparation of the Offset Strategy the foliar cover targets have been refined for inclusion in the OMP as completion criteria. The milestone and completion criteria reflect the projected foliar cover trajectory expected to achieve the final completion criteria target. For Banksia woodland (to achieve a final habitat quality score of 7/10), the foliar cover target is 30-40% at year 10 and 40-60% at year 15. For Marri woodland (to achieve a final habitat quality score of 6/10) the foliar cover target is 10-20% at year 10 and 20-40% at year 15. The foliage cover targets were developed by an experienced revegetation specialist based on restoration performance observed in comparable Western Australian woodland revegetation projects and are supported by published restoration literature. Multiple studies indicate that substantial vegetation cover can be established within the first decade following restoration, and that woodland structure, canopy development and ecological function continue to increase over subsequent years (Brundrett et al., 2017, 2020; Lee et al., 2013). Monitoring of the Banksia Woodland Restoration Project reported native vegetation cover of approximately 20% within five years of restoration and concluded that restored areas were trending toward recovery as Banksia woodland (Brundrett et al., 2020). Long-term rehabilitation studies in Jarrah-Marri forests of south-west Western Australia have demonstrated ongoing vegetation development over at least the first 12-14 years following establishment, while black cockatoo feeding activity has been recorded in revegetated Marri systems within 7-8 years of establishment and continues in older rehabilitation sites (Koch 2007; Norman et al. 2006). These findings support the appropriateness of the proposed foliage cover trajectories as performance indicator targets. The targets will be reviewed and refined, where necessary, following identification and assessment of appropriate reference sites, which will provide the basis for final completion criteria and long-term performance assessment The OMP provides a detailed framework to support achieving the target habitat quality of revegetation within the stated timeframe. Revegetation will be planned around soil types and uses locally appropriate forage species. Soil assessment and reference site

Summary of Comment Received	Response
	surveys will refine the final revegetation species mix, planting densities, seeding rates and milestone criteria before implementation. The OMP also outlines site preparation, local-provenance seed, direct seeding and tubestock planting, at least 20 years of maintenance, monitoring against progressive criteria, and corrective actions where the required trajectory is not achieved.
The commenter questions the 60% and 50% confidence values applied to the forecast revegetation outcomes, and that no evidence has been provided to support the estimates. The commenter considers that a structured uncertainty framework should be used to derive confidence in the result.	The OMP applies a revised value of 70% for confidence of change in habitat quality. The rationale is supported by selection of an offset area with suitable indicative soils and connectivity to existing habitat; legal protection in perpetuity; specialist-designed revegetation; local-provenance seed and planting stock; establishment and infill works; access, grazing, weed and hygiene controls; monitoring; and adaptive management. The OMP also acknowledges residual uncertainty associated with low rainfall, episodic seasonal conditions and natural events. The NEPA assessment team will review the inputs and determine the final offset requirement.
The commenter states that the Offset Strategy does not demonstrate alignment with the recovery plan for Carnaby's Black-Cockatoo or the recovery plan and conservation advice for the Forest Red-tailed Black-Cockatoo, as requested through the further information process.	Section 3.5 of the OMP identifies the applicable recovery documents and explains how the offset responds to relevant threats and recovery actions. Table 3.4 links the OMP measures to the Carnaby's Black-Cockatoo Recovery Plan and to the Forest Black Cockatoo Recovery Plan and approved Conservation Advice for Forest Red-tailed Black-Cockatoo. The OMP addresses habitat loss and fragmentation, declining foraging resources, shortage and competition for nesting hollows, and deterioration of habitat condition through revegetation, legal protection, retention of mature trees, artificial hollows, threat management, monitoring and adaptive management.
The commenter states that an Offset Management Plan was not provided with the advertised documentation. Consequently, details regarding final offset design and tenure, management actions, performance indicators, monitoring, reporting, adaptive management and achievement of forecast habitat-quality outcomes were unavailable for public review.	During the request for information process, the Commonwealth assessment team advised that the Offset Strategy was adequate to support public consultation on the Preliminary Documentation and that a detailed OMP would be prepared for the next assessment stage. The OMP has now been prepared and supersedes the Offset Strategy. It provides the offset location and baseline, revised calculations, legal security, management actions, revegetation framework, artificial-hollow commitments, completion criteria, monitoring, reporting and adaptive-management arrangements.

Summary of Comment Received	Response
The commenter considers preparation or publication of the Offset Management Plan after the public comment period limits public scrutiny and requests targeted public or stakeholder review of the draft plan under the EPBC Act.	The staged preparation of an Offset Strategy followed by the detailed OMP was undertaken in consultation with the Commonwealth assessment team. The Offset Strategy supported public consultation on the Preliminary Documentation, while the OMP has been prepared for the subsequent assessment stage. The OMP will be published as part of the EPBC Act assessment process.
The commenter questions whether proponent-appointed consultants can provide sufficiently independent and precautionary advice and states that the decision should be informed by scientifically robust information and the precautionary principle.	The OMP provides a transparent and auditable framework for regulatory assessment. It documents the offset-area baseline, calculator inputs and outputs, management actions, measurable milestone and completion criteria, monitoring methods, risk controls, reporting and adaptive-management processes. Monitoring and ecological assessments were undertaken by suitably qualified and experienced personnel, and the Commonwealth and State regulators will review the OMP and provide regulatory oversight of implementation and compliance. The proposed 27.25 ha revegetation commitment includes 20% additional area above the governing calculator-derived requirement to provide contingency for uncertainty in establishment and habitat development.
The commenter concludes that Neoen and Umwelt have not demonstrated that the proposed offset is suitable and adequate and recommends that the Action not be approved if approval depends on that offset proposal.	The OMP provides the detailed information required to assess the suitability and adequacy of the offset. It commits to revegetating and legally protecting 27.25 ha of cleared agricultural land; retaining mature Marri trees; installing artificial hollows at the required ratio; and implementing monitoring, maintenance and adaptive management to achieve completion criteria. The proposed area is 20% greater than the governing Commonwealth calculator-derived requirement of 22.71 ha. The offset will be protected in perpetuity through a conservation covenant, with the final requirement subject to regulatory assessment of the OMP. It is noted that the offset proposed is indicative, and NEPA will undertake independent offset calculations following review of the OMP, which will determine the final offset requirement.

2.0 Conclusion

This public comment response addresses all comments provided by the public, following a 20 business day consultation period which ended on 4 September 2026. As demonstrated in the responses in Table 1.1, matters raised in the submission are addressed through information now presented in the OMP. Accordingly, no amendments to the Preliminary Documentation are considered necessary in response to the comments received.

3.0 References

Doherty, T., Wingfield, B., Stokes, V., Craig, M., Lee, J. G. H., Finn, H. C., & Calver, M. C. (2016). Successional changes in feeding activity by threatened cockatoos in revegetated mine sites. *Wildlife Research*, *43*, 93–104.

Koch, J. (2007). Restoring a jarrah forest understorey vegetation after bauxite mining in Western Australia. *Restoration Ecology*, *15*(S4), S26–S39.

Lee, J. G. H., Finn, H. C., & Calver, M. C. (2013). Ecology of black cockatoos at a mine-site in the eastern jarrah-marri forest, western Australia. *Pacific Conservation Biology*, *19*(1), 76. https://doi.org/10.1071/PC130076

Norman, M., Koch, J., Grant, C., Morald, T., & Ward, S. (2006). Vegetation succession after bauxite mining in Western Australia. *Restoration Ecology*, *14*, 278–288.

Appendix A

Public Submission

[redacted]

[redacted]

[redacted]

Yathroo Wind Farm (EPBC 2025/10390)

Please accept my submission on the Preliminary Documentation[1] (**PD**) and Offset Strategy (**Strategy**) for Neoen Australia Pty Ltd.'s (**Neoen**) proposal to construct, operate, maintain and decommission the Yathroo Wind Farm, including up to 65 wind turbines and associated infrastructure as well as a Battery Energy Storage System, located approximately 5 km south of the town of Dandaragan, 6.3 km north of Regans Ford and 120 km north of Perth, WA.

My comments relate to the PD and Strategy prepared by Umwelt (Australia) Pty Ltd (**Umwelt**) and made available on Yathroo Wind Farm's website. In making this submission I had regard for the requirements of the EPBC Act Environmental Offsets Policy 2012 (the **Policy**) and the How to use the Offset Assessment Guide (the **Guide**).

As I review environmental offset documents such as the above, I am mindful consulting firms act in their clients' interests, and therefore in their own business interests, by preparing documents, and liaising with officials, to secure timely approvals with minimal compliance cost and regulatory risk. Even if required to do so, consulting firms cannot be relied on by the National Environment Protection Agency (**NEPA**) to reveal knowledge, professional judgement or scientific uncertainty that may prejudice those interests.

To counter the above business interests, the Policy imposes an obligation on the NEPA to decide on offsets that are, amongst other requirements, *informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty*.

Residual significant impacts and proposed offsets

I note Neoen considers the residual significant impacts to be the clearing of Carnaby's Black-Cockatoo (**CBC**) and Forest Red-tailed Black-Cockatoo (**FRTBC**) foraging habitat, ranging from '*low*' to '*moderate to high*' quality[2], and up to five potential black cockatoo nest-trees.

I understand the proposed offset site, to a maximum area of 19.34 ha (Table 4.4) is located within the cleared component of the polygon shown at **Figure 1** below, at a property on Scenic Drive and Rowes Road, Yathroo.

I consider the proposed offsets unreliable and/or inadequate because:

- Umwelt's offset calculations are opaque, and the direct offset exaggerated;
- calculator inputs are not evidence-based (no *confidence in result)*; and
- key information requirements are not addressed.

[1] Yathroo Wind Farm, Assessment of Impacts to Matters of National Environmental Significance (Final) June 2026.
[2] According to Bamford (2020), revised April 2021.

Figure 1. General location of proposed offset site.



Offset calculations are opaque, and the direct offset exaggerated

Table 3.2 of the Strategy sets out the proposed impacts and offsets for black cockatoo foraging habitat. The extract for CBC is set out below.

Table 3.2 EPBC Act Offset Calculator Impact Quantum and Required Offset Area: Black-Cockatoo Species Foraging Habitat

Species	Habitat Quality Score	Residual Impact Area (ha)	Impact Quantum (adjusted ha)	Required Offset Area (ha)
Carnaby's Black-Cockatoo	Negligible to Low (1)	6.73	0.67	N/A
	Low (2)	4.33	0.87	2.15
	Low to Moderate (5)	7.26	3.63	8.99
	Moderate (6)	2.68	1.61	3.99
	Moderate to High (7)	0.65	0.46	0.99
	Total	**21.64**	**7.24**	**16.12**

Unfortunately, Umwelt has chosen to not include the offset assessment guide calculations for impacts to black cockatoo habitat that accompany the rows **low (2)** to **moderate to high (7)**. Instead, page 23 of the Strategy states:

> *Based on the calculations as summarised in Table 4.4 revegetation of 16.12 ha is required to offset the impacted 14.92 ha of Low to Moderate/High black cockatoo foraging habitat. To provide a greater net gain in foraging habitat, 20% additional revegetation is proposed resulting in a total revegetation area of 19.34 ha, which exceeds the minimum EPBC Act offset requirement.*

Without offset assessment guides for each impacted habitat quality, it is unclear how Umwelt, using values in Tables 3.2 derived the '*applied requirement*' or '*the greater net gain*' shown in Table 4.4 (below).

Table 4.4 EPBC Offset Calculator Net Gain from Proposed Revegetation

Impact Quality	Calculated Required Offset (ha)		Applied Requirement* (ha)	Proposed Offset (ha)	Proportion of Direct Offset Met
	Carnaby's Cockatoo	Forest Red-tailed Black-cockatoo			
HQS 2-6	15.13	9.78	15.13	18.15	
HQS 7	0.99	0.05	0.99	1.19	
Total	**16.12**	**9.83**	**16.12**	**19.34**	**120%**

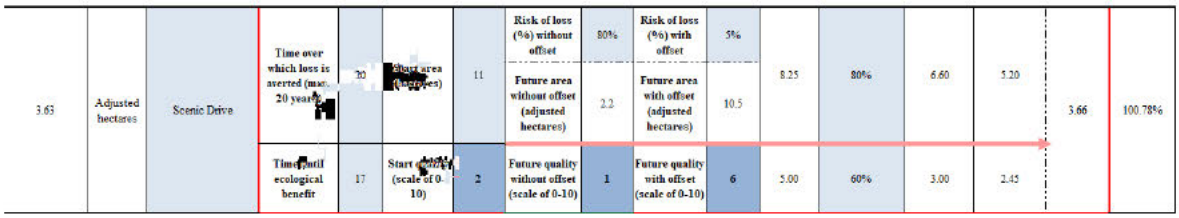
Using Umwelt's calculator inputs (see below) that the offset site is HQS 2 at commencement, without offset will decline to HQS 1 over 17 years, and risk of loss[3] over a 20 year period is 5%/80% with/without offset (at 80% confidence), then the following table applies.

HQS/area	**Offset (T3.2)**	**Gain/conf.**	**Dir. offset**	**+ 20%**	**Dir. offset**
2/4.33 ha	2.15 ha	5/60%	82.57%	2.58 ha	99.08%
5/7.26 ha	8.99 ha	5/60%	82.37%	10.19 ha	93.36%
6/2.68 ha	3.99 ha	5/60%	82.52%	4.788 ha	99.07%
7/0.65 ha	0.99 ha	6/50%	99.34%	1.188 ha	99.34%
	16.12 ha			18.75 ha	

To illustrate, the following figure is an extract from my calculation of the direct offset achieved by 8.99 ha (from Table 3.2) to offset impacts to 7.26 ha of HQS 5.



To meet the 100% direct offset requirement, the offset area for impacts to 7.26 ha of HQS 5 should be ~11 ha (not 9 ha).



Given Umwelt's assumptions, and the limited information provide in the Strategy, I consider the estimated offset area unreliable and to the naive reader potentially misleading, and the proposed 19.34 ha offset area inadequate.

[3] Reference the 2017 *Guidance for deriving 'Risk of Loss' estimates when evaluating biodiversity offset proposals under the EPBC Act* as a Department of the Environment and Energy publication is incorrect. The report was prepared by Maseyk etc al, Centre of Biodiversity and Conservation Science, School of Earth and Environmental Science, The University of Queensland.

Calculator inputs are not evidence-based (no *confidence in result*)
The PD and Strategy are intended to inform decision-making by the Minister or delegate. This includes adequately explaining the offset proposal and identifying and addressing scientific uncertainty. Relevantly:

- **Principle 7** of the Policy states *suitable offsets must: be efficient, effective, timely, transparent, scientifically robust and reasonable*; and
- **Principle 9** of the Policy states *in assessing the suitability of an offset, government decision-making will be informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty*.

Umwelt are likely to be underestimating the proposed offset area because the offset is calculated using inputs that are not justified by evidence and/or that apply the precautionary principle. Specifically, Umwelt fails to demonstrate:

- that paddock tree clearing in the offset area, which has occurred until recent years, is approved or exempt from WA's clearing regulations. My reading of the Clearing Regulation Fact Sheet is that the clearing is required to be authorised. Aerial imagery shows paddock trees were heavily cleared during 2016 and before 28 November 2016[4] (see **Appendix A**). Umwelt's 80% confidence in risk of loss without offset only applies if the clearing is exempt or approved, otherwise 0% risk of loss *with* and *without offset* should apply[5];

- that the proposed offset area can be revegetated so that, within 15 years of commencement of revegetation, an offset area of:

    - 18.15 ha will be restored to a Marri or Banksia woodland with a projected foliage cover of 20-40%; and

    - 1.19 ha will be restored to a Marri woodland with a projected foliage cover of 40-60%, or a Banksia woodland with a projected foliage cover of >60%;

- a scientifically robust and/or precautionary basis for selecting 15 years as the time *for self-sustaining community of Marri woodland vegetation to achieve foraging habitat benefits*; and

- that confidence in these timebound outcomes, respectively 60% and 50%, is appropriate. Umwelt provides no evidence these outcomes can be achieved, and so the *confidence in result* may be less than 50%, and insufficient to support an approval decision.

I suggest that the proposed offset outcomes for black cockatoo foraging habitat are simply speculation by Umwelt to secure the delegate's approval.

Unfortunately, Umwelt fails to adopt any industry standard, regulator approved, or authoritative framework to evaluate its remarks regarding offset outcomes, and on which to select a precautionary *confidence in result*.

[4] Part of a paddock tree clearing campaign across the property (see **Appendix B**).
[5] Umwelt should not discount Neoen's offset obligations through potential for further unauthorised clearing.

I recommend the confidence in result be derived by applying the Intergovernmental Panel on Climate Change's (IPCC) July 2010 Guidance Note on Consistent Treatment of Uncertainties[6], particularly the Agreement/Evidence matrix in Figure 1 of the Guidance.

The IPCC Guidance provides *'a common approach and calibrated language … for developing expert judgments and for evaluating and communicating the degree of certainty in findings …'* albeit for the 2014 Fifth Assessment Report[7]. It relied on '*two metrics for communicating the degree of certainty in key findings …'*:

- *'confidence in the validity of a finding, based on the type, amount, quality, and consistency of evidence'*; and
- *'quantified measures of uncertainty in a finding expressed probabilistically'*.

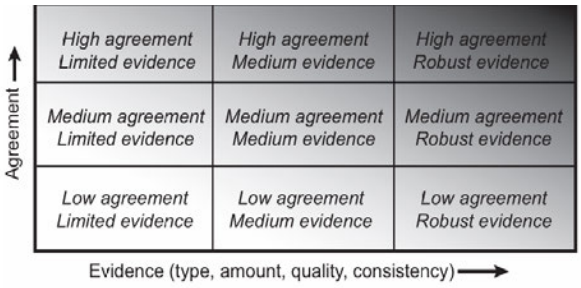


Figure 1: A depiction of evidence and agreement statements and their relationship to confidence. Confidence increases towards the top-right corner as suggested by the increasing strength of shading. Generally, evidence is most robust when there are multiple, consistent independent lines of high-quality evidence.

Table 1. Likelihood Scale

Term*	Likelihood of the Outcome
Virtually certain	99-100% probability
Very likely	90-100% probability
Likely	66-100% probability
About as likely as not	33 to 66% probability
Unlikely	0-33% probability
Very unlikely	0-10% probability
Exceptionally unlikely	0-1% probability

* Additional terms that were used in limited circumstances in the AR4 (*extremely likely* - 95-100% probability, *more likely than not* – >50-100% probability, and *extremely unlikely* – 0-5% probability) may also be used in the AR5 when appropriate.

I could not locate in the documents evidence and/or 'independent agreement' that supports any level of confidence of attaining the future quality.

Key information requirements are not addressed

I note the Department's Request for Further Information (**RFI**) at Table ES1 of the PD sets out the following offset-related information:

- *Please provide an offset package to compensate for residual significant impacts to MNES. This should consist of an offset proposal and key commitments and management actions to deliver and implement a proposed offset (i.e. an Offset Management Plan) and align with the relevant Recovery Plans and Conservation Advice for the species*;

The offset proposal fails to make reference to, and therefore align with, the 2013 CBC recovery plan, the 2009 conservation advice for FRTBC and the 2008 recovery plan for FRTBC.

- *To support your offset strategy, an offset management plan must be provided to demonstrate how the proposed offset will meet the EPBC Act Offset Policy*.

An offset management plan (OMP) is not provided, and so it remains unclear how Umwelt proposes to by design, and then adaptively implement, an OMP that achieves the above ecological outcomes (i.e. timebound HQS values and completion criteria). These are critical details as they are the basis on which the adequacy of the offset site has been estimated

[6] www.ipcc.ch/site/assets/uploads/2017/08/AR5_Uncertainty_Guidance_Note.pdf
[7] www.ipcc.ch/assessment-report/ar5/

using the Guide. Instead, Neoen has chosen to not provide this information, stating in Section 10.2 of the PD:

> *An Offset Management Plan will be prepared to support implementation of the offset strategy and is expected to include the final revegetation offset area and tenure arrangements, revegetation and management actions, nest box specifications and locations, performance indicators, monitoring, reporting and adaptive management measures. The document would be developed to support approval conditions relating to offsets and to provide the basis for ongoing implementation and compliance.*

This is a concerning trend with Neoen and Umwelt, as they have previously chosen to not publish for public comment key details of an offset proposal - the OMP - avoiding public scrutiny, and deferring review to the Department during the post approval phase. There are provisions in the EPBC Act for public review of draft action management plans which the Department has chosen not to use.

For public consultation on the Goyder North Renewable Energy Facility Stage 1, South Australia (EPBC 2024/09929), approved 19 February 2026, Neoen's draft Offset Strategy failed to, amongst other matters:

- delineate and propose areas of Pygmy Blue-tongue Lizard (PBTL) habitat and Iron-grass Natural Temperate Grassland ecological community (INTG) to be secured and managed as direct offsets; and

- provide a habitat quality scoring framework for deriving a suitable and adequate offset area for the PBTL.

In its response to my comments dated 19 November 2025 (**Attachment**), Neoen observed:

> *Broadly, the comments received here identify gaps in the (high level) Offset Strategy (which was provided with the Preliminary Documentation for Public Comment) which are now covered in the Offset Management Plans - a subsequent step in the development of the EPBC offsets which was not available at the time of public comment. This process of Offset Strategy followed by more detailed Offset Management Plans follows the draft DCCEEW guidance, and has been agreed with DCCEEW from early on in the approval process, which the commenter may not be aware of.*

It is worth noting that:

- the draft PD and incomplete offset proposal for Goyder North was released for comment on 22 October 2025, with comments closing **19 November 2025**;
- the final PD, which included draft OMPs no longer available for public comment, was released for public inspection on **9 January 2026**; and
- V1 of the published PBTL and INTG OMPs are both dated **5 December 2025**. The version history of each OMP suggests drafting commenced only days after close of public comments on the PD.

This signals a clear intent by Neoen, supported by Umwelt, to expedite the assessment and approval process, contrary to the Department's RFI requirements, and at the expense of a complete, transparent public review process. Given this, I expect a draft OMP for the Yathroo

offset site is also at an advanced stage and publication is intentionally delayed preventing public review and scrutiny.

Concluding remarks
Neoen and Umwelt have not demonstrated that the proposed offset is suitable and adequate. On this and previous form, the parties cannot be trusted by the NEPA to comply with the Policy and Guide.

I am sympathetic to first releasing an offset proposal/strategy for public review and, following that review, preparing a draft OMP based on an approved offset proposal. This is a sensible strategy to manage the risk that the draft proposal may require significant review. However, this process relies on the offset proposal being scientifically robust and precautionary, and that the draft OMP be released for targeted public or stakeholder review in accordance with Section 134A of the EPBC Act.

If approval of the action is dependent on a suitable and adequate offset proposal, then the action as proposed should not be approved.

Yours sincerely.

[redacted]

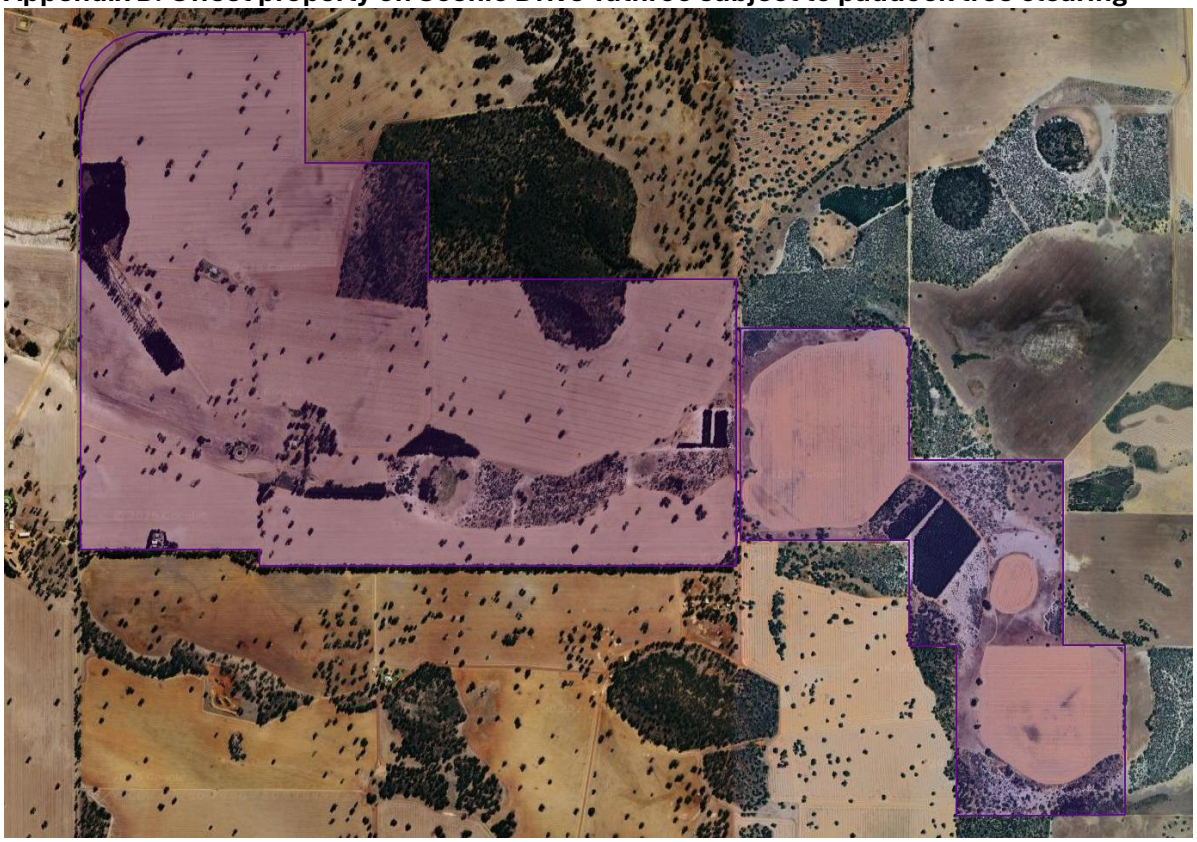
4 September 2026

Attachment: Response to public comment received for the Goyder North Wind Farm Preliminary Documentation (EPBC 2024/09929).

Appendix A: Aerial imagery of November 2016 showing extensive and active paddock tree clearing.



Appendix B: Offset property on Scenic Drive Yathroo subject to paddock tree clearing



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