Preliminary Cleared Vegetation Management Plan

Dugald River Wind Farm Project

PREPARED FOR

MMG Dugald River Pty Ltd

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Dugald River Wind Farm Project

0755929

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CONTENTS

LIST OF TABLES

LIST OF FIGURES

ACRONYMS AND ABBREVIATIONS

Acronym	Description
BESS	Battery Energy Storage System
ESC	Erosion and Sediment Control
ERM	Environmental Resources Management Pty Ltd
HSE	Health, Safety and Environment
Met Mast	Meteorological Mast
MMG	MMG Dugald River Pty Ltd
PCVMP	Preliminary Cleared Vegetation Management Plan
PVFMP	Preliminary Vegetation Flora Management Plan
QFES	Queensland Fire and Emergency Service
SARA	State Assessment and Referral Agency
The Project	Dugald River Wind Farm Project
WTG	Wind Turbine Generator

1. INTRODUCTION

MMG Dugald River Pty Ltd (MMG) proposes to develop the Dugald River Wind Farm Project (the Project) which comprises the construction, operation and decommissioning of up to 24 Wind Turbine Generators (WTGs) and a Battery Energy Storage System (BESS).

Ancillary features of the Project include up to two (2) permanent Meteorological Masts (Met Masts) and associated infrastructure including access tracks, foundations, hardstand areas, underground cabling, overhead powerlines, material laydown areas, construction areas and a centralised operations area.

1.1 OBJECTIVES AND SCOPE

This Preliminary Cleared Vegetation Management Plan (PCVMP) has been prepared to satisfy the requirements of State Code 23: Wind Farm Development and State Code 27: Battery Storage Facility Development, and outlines how vegetation cleared as part of the Project will be stored, managed and reused.

The objective of the PCVMP is to describe the strategies that will be implemented to manage bushfire risks associated with the clearing and management of vegetation, biosecurity and resource availability for future rehabilitation. The PCVMP applies to all vegetation cleared during construction and any subsequent maintenance works that generate felled vegetation due to the Project.

1.2 PROJECT DESCRIPTION

The Project will be located on the Knapdale Range, adjacent to the Dugald River Mine, owned and operated by MMG. The Project is situated on State Land, 63 km north-east of the Township of Cloncurry and immediately west of Dugald River Mine.

The Knapdale Range is situated within the Mount Isa subregion, which is characterised by tilted metamorphic hills and ranges, low open woodlands with *Eucalyptus spp., Corymbia spp* and Spinifex dominant grasslands with *Acacia spp.* dominant shrub layers throughout. Soil types range from rocky, skeletal soil types to shallow-moderate sandy loam towards the eastern base of the range.

The Project is proposed to be constructed in two stages. The first stage is proposed to comprise the construction and operation of a Met Mast and up to eight WTGs, with an associated substation and BESS. Following the construction and operation of the first stage of the Project, the second stage is proposed to consist of an additional Met Mast, up to 16 WTGS and an expanded BESS.

Once both stages of construction are completed, the Project will consist of the following:

- Up to 24 X 6 MW WTGs;
- A staged BESS facility comprising maximum 66 battery units and 33 Medium Voltage Power Stations;
- Two permanent Met Masts;
- Access tracks, Hardstand and Material laydown areas;
- Supporting infrastructure (including a collection substation, switchyard and underground and overhead powerlines);

- An Operations And Maintenance Facility.

The Project comprises a total disturbance footprint of 136.74 ha as detailed in Table 1-1 and as shown in Figure 1-1.

TABLE 1-1 PROJECT SPECIFICATIONS

Feature	Details	Area (ha)
Stage One		
WTG Construction Areas	8 X WTGs	21.67
Central Operations and Switchyard Area	• 18 X Battery Units • 9 X MVPS • Substation and Switching Infrastructure • Operations Facility	2.29
Access Tracks	Access Tracks	30.09
Met Mast 1	Stage 1 Met Mast	0.28
33 kV Powerline	Stage 1 Overhead Powerline which links each WTG to the Central Switchyard Area. This area includes the underground power corridors between each WTG and the closest power pole	11.34
220 kV Powerline	Overhead Powerline linking the Central Operations and Switchyard Area to the DRM	4.69
Laydowns	2 X Laydown areas for storage and construction purposes	2.42
Taglines	Temporary Taglines used during construction of each WTG	1.26
	Stage One Disturbance Area	*74.04*
Stage Two		
WTG Construction Areas	Up to 16 X WTGs	31.5
Central Operations and Switchyard Area	• 30 X Battery Units • 15 X MVPS	Nil additional disturbance
Access Tracks	Access Tracks	30.64
Met Mast 2	Stage 2 Met Mast	0.28
Stage 1 and 2 Link	Easement between Stages 1 and 2	0.27
	Stage Two Disturbance Area	*62.69*
	Total Disturbance Footprint	136.74

1.3 VEGETATION DESCRIPTION

The vegetation communities within the Project site have been ground-truthed through ecological surveys undertaken by independent third-parties.

Table 1-2 provides details of the vegetation, which comprises a mixture of mapped and ground-truthed regional ecosystems, and a summary of the total area of impact to each. The vegetation communities identified within the Study Area as well as the Project's Disturbance Footprint are displayed on Figure 1-2, prepared by Wulguru Technical Services.

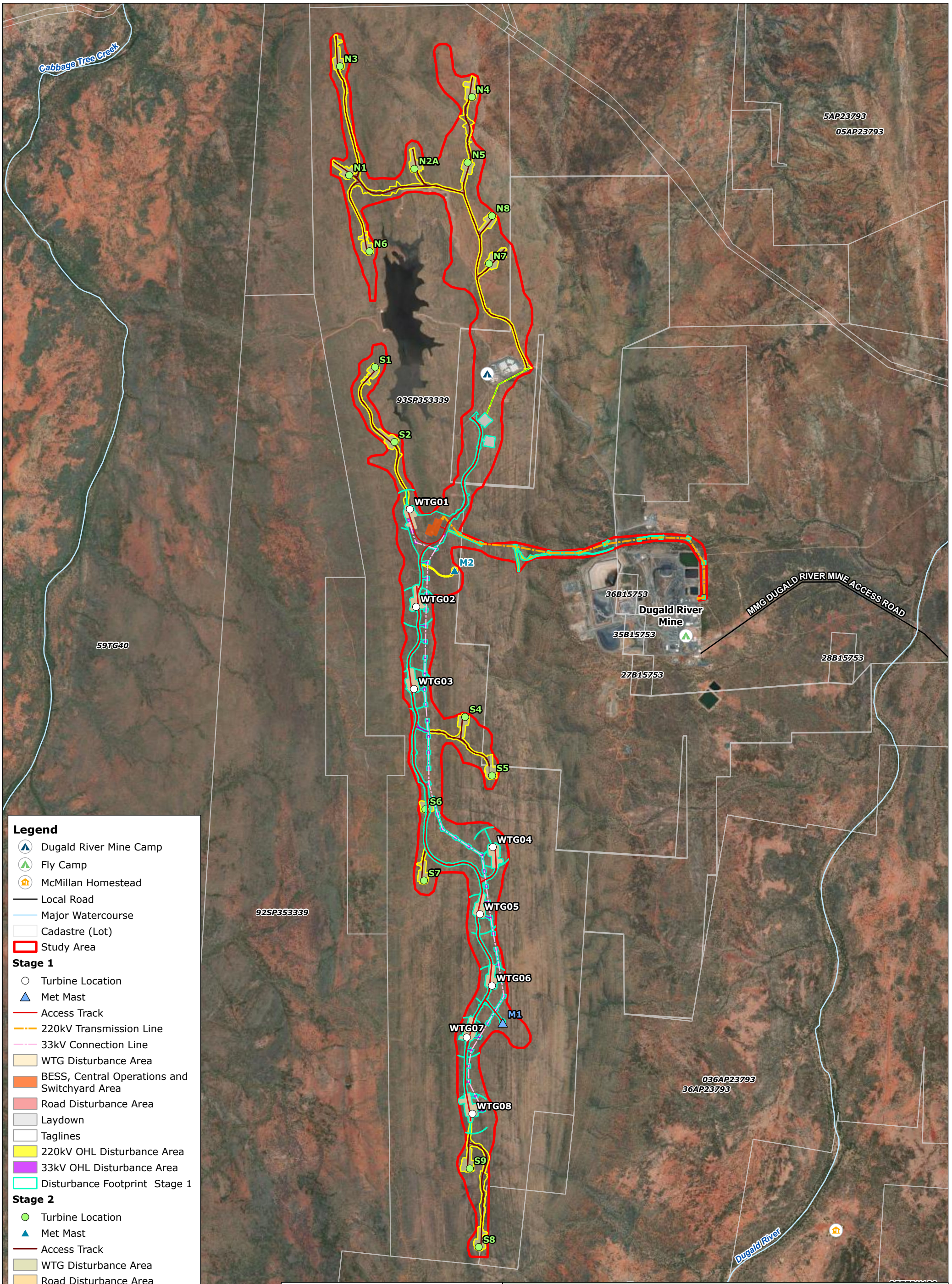

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TABLE 1-2 GROUND-TRUTHED REGIONAL ECOSYSTEMS

Regional Ecosystem	Description	Area within the Study Area (ha)	Area within Stage 1 Footprint (ha)	Area within Stage 2 Footprint (ha)
1.3.7b	*Eucalyptus camaldulensis* fringing woodland, usually with *Lophostemon grandiflorus* and *Melaleuca bracteata* and/or *M. dissitiflora.* Occurs on recent levees and channel deposits of medium and smaller tributaries which are dry for most of the year; alluvial soils. Riverine.	2.13	0.27	0
1.5.4	*Eucalyptus leucophylla* and/or *Corymbia terminalis* low open woodland to low woodland over annual grasses with areas of *Triodia spp*. Occasional *Corymbia aparrerinja*, *Atalaya hemiglauca* and *Grevillea striata* and small areas of *Acacia cambagei* and *Eucalyptus leucophloia*. Occurs on plains and valley bottoms; red earths, shallow loams, clays and skeletal soils. Not a Wetland.	6.81	0.83	0
1.7.7b	*Corymbia capricornia* and/or *Eucalyptus miniata* low open woodland often with *Eucalyptus herbertiana*, *Eucalyptus leucophloia* and/or *Corymbia ferruginea*. *Eucalyptus tetrodonta* may be present in the far north. A second tree layer of *Terminalia canescens* may be present. The shrub layer is mixed and includes *Petalostigma quadriloculare*, *Grevillea dryandri*, *Terminalia canescens* and *Acacia calligera*. Ground layer of *Triodia spp*. and tussock grasses. Occurs on silcrete and lateritic surfaces. Not a Wetland.	2.47	0.0	0.52
1.11.2a	*Eucalyptus leucophloia* low open woodland often with *Corymbia terminalis*, *Corymbia capricornia*, *Terminalia aridicola* and *Eucalyptus leucophylla* with shrub layer of *Acacia spp*. and ground layer of Triodia spp. Occurs on steep hills and strike ridges. Not a Wetland.	577.59	67.60	61.17
1.11.3a	*Eucalyptus leucophylla* low open woodland often with *Corymbia terminalis*, *C. aparrerinja*, *Eucalyptus leucophloia* and *Atalaya hemiglauca* with scattered shrubs of *Acacia chisholmii* and a sparse ground layer of *Triodia pungens* and tussock grasses. Occurs on broad low hills; metamorphosed igneous rocks. Not a Wetland.	25.89	5.02	0.48
Non-remnant	N/A	16.68	0.35	0.56
	Total	**631.57**	**74.07**	**62.73**

Legend

Project Disturbance Footprint

RE Ground Truting Sites

- Quaternary
- Secondary

GTRE

- 1.11.2/1.5
- 1.11.2a
- 1.11.2a/1.
- 1.11.2e/1.
- 1.11.3a
- 1.11.3b
- 1.11.7
- 1.3.13a
- 1.3.7b
- 1.5.4x2
- Non-remnan

Google Imagery

FIGURE 1.2 GROUNDTRUTHED REGIONAL ECOSYSTEM

1 0 1 2 km

CRS: GDA94 / MGA zone 54
Scale: 1:40,000 @A3

Date: 2 April 2026
Author: M. Kaminski
Version: 0.01

WULGURU TECHNICAL SERVICES

Project Number: 2024.1104
Client: MMG

2. CLEARED VEGETATION MANAGEMENT

2.1 ROLES AND RESPONSIBILITIES

A summary of the roles and responsibilities of relevant entities for delivery of the Project works as they relate to cleared vegetation management, are set out in Table 2-1. As the commercial agreements between MMG and any third-party contractors will be finalised during the detailed design (for construction) phase, the roles and responsibilities will be refined.

Each member of the Project delivery team has a 'General Environmental Duty' under Section 319 of the *Environmental Protection Act 1994,* and will not carry out any activities that cause, or are likely to cause environmental harm, unless all reasonable and practical measures are taken to prevent or minimise harm.

TABLE 2-1 ROLES AND RESPONSIBILITIES

Role	Responsibility
Principal Contractor	• Responsible for site environmental management, PCVMP implementation and compliance, including subcontractors; • Deliver the Project in accordance with all laws, including conditions of approval; • Provide notifications and reports, as required by law, including conditions of approval; • Ensure the construction workforce are properly and regularly trained in environmental responsibilities, including site inductions and toolbox talks; • Establish and maintain a complaints management system, to receive and respond to complaints; • Monitors work to ensure all PCVMP obligations are met; and • Reports on and responds to identified hazards, non-compliances and incidents.
MMG / MMG Project Manager	• Proponent for the Project; • Oversees the contractor's activities to achieve the environmental outcomes; • Notification to State and/or Commonwealth authorities of any incidents or non-conformances in accordance with approval requirements; • Ensures adequate planning and resources are provided for the implementation of the PCVMP including relevant inductions and training; • Identifies changes during construction and ensures the PCVMP is updated accordingly; • Ensures that vegetation and fauna management obligations are embedded into Project design, systems and processes; • Ensures reporting requirements are completed and opportunities for improvement are identified and communicated; and • Review and approves the completion of assurance audits to confirm compliance with the Preliminary Vegetation Flora Management Plan.

Role	Responsibility
Environmental Manager	• Reviews the PCVMP to ensure compliance with site environmental management, Emergency Management Systems compliance, and performance expectations; • Oversees development and ensures environmental awareness material meets required standard(s); • Oversight of environmental advisor's duties for the duration of construction; • Oversight of Principal Contractor's performance to compliance and environmental reporting expectations; • Undertakes internal audits in accordance with the Health, Safety and Environment (HSE) Audit Schedule; • Reports demonstration of compliance with applicable environmental legislation, conditions of approval and contractual obligations; • Collaborates with community team to support community feedback and expectations; • Approval of relevant Ground (and vegetation) Disturbance Permits, including disturbance to vegetation and topsoil and sub-soils; • Support Project in rectifying and/or updating PCVMP actions, as needed; • Supports environmental incident investigations, including Incident Cause Analysis Method as and if required; • Non-conformances are actioned and corrective actions are implemented where needed; and • Notification of relevant government departments of any incidents or non-conformances in accordance with approval requirements.
Environmental Advisor	• Monitor compliance with the PCVMP, other management plans, applicable environmental legislation, conditions of approval and contractual obligations; • Review any audit and compliance reports prepared by the contractor or proponent; • Have an oversight of the implementation of the environmental monitoring requirements established. Review the results of the monitoring and verify these results against conformance requirements; • Oversee compliance against relevant Ground Disturbance Permit, including disturbance to vegetation and topsoil and sub-soils; and • Immediate notification of MMG of any incidents or non-conformances to the Project or Environmental Manager in accordance with approval requirement.
Site Supervisors	• Responsible for the implementation and maintenance of environmental management and mitigation measures for all activities and work areas; and • Ensure relevant environmental permits are approved, communicated and implemented with relevant environmental controls and performance expectations.

Role	Responsibility
Site Personnel	• Ensure that environmental nuisance or harm is minimised by adhering to all Project environmental management plans and documentation; • Maintain familiarity with key environmental risks and associated management and mitigation measures; • Complete relevant inductions, training and ongoing toolbox talks; • Report all observed hazards, non-compliances and incidents to a supervisor; and • Continually seeks to identify areas for improvement of cleared vegetation management and reports these to a supervisor.
Fauna Spotter Catcher / Suitably Qualified Ecologist	• Pre-clearance surveys, habitat relocation supervision, identification of suitable vegetation for PCVMP management actions and fauna handling/rescue works; and • Provision of pre-clearance and ongoing monitoring reports for all vegetation clearing works in accordance with the requirements of the Preliminary VFMP and PCVMP.

2.2 PRE-CLEARING PREPARATION AND CONTROLS

Key management measures for the Project are:

- Avoid, minimise or mitigate (in order of preference) any impacts on areas of sensitive vegetation or other areas of ecological value;
- Minimise the risk of injury, harm, or entrapment to wildlife and stock;
- Minimise disturbance to land that may otherwise result in land degradation;
- Prior to carrying out any disturbance activities, make all relevant staff, contractors or agents carrying out those activities, aware of the location of any Category A, B or C Environmentally Sensitive Area and the relevant requirements of this environmental authority;
- If significant disturbance to land is unavoidable, the holder of this environmental authority must clear vegetation in a way which minimises fragmentation; and
- Manage cleared vegetation so that it is stockpiled in a manner that facilitates salvage and respreading and does not impede vehicle, stock or wildlife movements.
- A registered spotter/catcher is to be engaged to work ahead of site clearing works at the commencement of vegetation clearing to ensure the protection of species that may be of conservation significance.
- In the event of identification of threatened species on the licensed place, a diagrammatic representation of the species occurrence relative to the mining activity together with a management and monitoring strategy for species conservation must be prepared to the satisfaction of the administering authority and submitted with the plan of operations.
- If animal breeding places or animal offspring are identified during pre-clearance surveys, clearing works can't proceed as the environmental authority does not authorise the taking of protected animals or the tampering with an animal breeding place that is being used by a protected animal to incubate or rear the animal's offspring.

In accordance with condition I9, the holder of the EA must take all reasonable and practicable measures to avoid, minimise and mitigate impacts on the Purple-necked Rock-wallaby (*Petrogale purpureicollis*).

In accordance with Condition I28, all watercourse crossings must be demonstrated to be constructed to minimise the clearing of riparian vegetation.

Actions prior to clearing include:

- Demarcating the extent to which clearing is necessary for the works proposed to limit disturbance of vegetation to the minimum extent required (this may be undertaken in stages);
- Conduct pre-clearance surveys, identification of suitable vegetation, and relocation of fauna handling/rescue works (stop work if animal breeding places or animal offspring are identified during pre-clearance surveys);
- Make all relevant staff, contractors or agents carrying out those activities, aware of the location of any Category A, B or C Environmentally Sensitive Area (ESA);
- A plan for dealing with fauna during clearing and construction;
- Follow any actions required in the Erosion and Sediment Control (ESC) Management Plan to prevent sediment runoff from entering into watercourses and/or surrounding landscapes during all construction phase from vegetation clearing;
- Consider appropriate machinery / equipment required and complete a risk assessment before undertaking clearing;
- Ensure all relevant staff, contractors or agents are appropriately trained to undertake tree felling / vegetation clearing activities and are briefed on clearing stages (as required);
- Ensure weather conditions are appropriate before undertaking clearing activities.

2.3 MANAGEMENT OF FELLED VEGETATION

Clearing throughout the Project must be undertaken in accordance with all legislative standards and requirements, MMG standards and relevant management plans (e.g. Vegetation and Fauna Management Plan, Construction Environmental Management Plan.)

The Project is located within areas of high and medium potential bushfire intensity. All felled vegetation will be managed to reduce the level of the potential severity of a bushfire and fire intensity.

Management of felled vegetation will be undertaken through:

- Separation of vegetation and large timber/ hollows and placement in dedicated stockpiles; and/or
- Reused on site for habitat enhancement during rehabilitation; and/or
- Mulched on site for use to spread over exposed soil to act as erosion control during rehabilitation; and
- Segregation and treatment of weed-infested material to prevent spread.

To reduce the buildup of potential fuel loads, felled vegetation will be managed (separated/sorted) concurrently with clearing activities. This eliminates the need for large stockpiles of vegetation that pose a fire risk.

2.3.1 REUSE ON SITE

Where practicable, felled vegetation generated during clearing activities will be retained and reused on site, rather than destroyed or removed entirely. The reuse of felled vegetation will be undertaken in a manner that supports erosion control, habitat enhancement and rehabilitation outcomes, while avoiding adverse impacts on site safety, access, drainage, and bushfire risk.

Potential reuses of felled vegetation include, however are not limited to, the following:

- **Habitat enhancement:** Selective placement of logs and coarse woody debris within adjacent vegetation or disturbed areas to create additional habitat features and shelter opportunities for fauna.
  - Vegetation suitable for use as habitat enhancement include vegetation containing habitat / microhabitat features such as hollows, ant or termite nests or are otherwise deemed suitable by a suitably qualified Fauna Spotter Catcher or ecologist during pre-clearance surveys or clearing activities.
  - All reused felled vegetation will be selectively placed and managed to ensure it does not:
    - Obstruct, redirect or modify natural or designed site drainage pathways;
    - Obstruct operational or emergency access tracks; and
    - Increase bushfire risk, including through inappropriate stockpiling or placement within fire-managed areas.
- **Mulching for site management:** Mulching of suitable vegetation for use in erosion and sediment control measures, weed suppression, habitat restoration and surface stabilisation across the Disturbance Footprint.
  - Spreading mulch over topsoil can help to maintain soil moisture levels and suppress weed recruitment, while also increasing the recruitment of local species through the spread of native seeds. Vegetation designated for mulching should be processed as soon as practical after felling to minimise drying and to reduce fire risk.
  - Weeds of National Significance or other invasive species that can regenerate vegetatively will not be mulched and will be separated for removal off site.
  - Vegetation unsuitable for mulching will be identified by a suitably qualified Fauna Spotter Catcher or ecologist during pre-clearance surveys or clearing activities.

2.3.2 REMOVAL OFF SITE

Where the reuse of felled vegetation on site is not feasible or appropriate, the material will be removed from the Project site. Removal of non-reusable vegetation will be undertaken to reduce potential fire risk and to maintain safe site conditions during construction and operation.

All felled vegetation that is removed from the Project site will be transported to approved or authorised offsite disposal or reuse facilities. These facilities may include licensed green waste processing facilities, composting or mulching facilities, or other locations permitted to lawfully receive and manage vegetation material.

Weeds of National Significance or other invasive species that can regenerate vegetatively will be removed for immediate off-site disposal to prevent weed seed spread and the establishment of invasive species. Invasive plant species are to be identified and managed in accordance with the Weed and Pest Management Plan and Construction Environmental Management Plan.

Transportation of felled vegetation will be managed to prevent loss of material along transport routes. Loads will be appropriately secured and contained to minimise the risk of vegetation falling from vehicles, the spread of weed material, and potential impacts to public safety and the surrounding environment.

In accordance with Schedule G – Non Mineral Waste, Condition 4, unless otherwise permitted by the conditions of this environmental authority or with prior approval from the administering authority and in accordance with a relevant standard operating procedure, waste must not be burnt.

2.4 TOPSOIL MANAGEMENT

Topsoil management should be undertaken in accordance with Schedule I – Land and Rehabilitation, Condition 3 to 5 Topsoil.

The stripping of topsoil and underlying soil layers suitable as a growth medium prior development is standard practice, primarily for rehabilitation and/or revegetation purposes.

Growth medium stripping will not exceed the recommended stripping depths as determined from soil surveys, as contamination of potentially saline/alkaline subsoil can negatively affect the quality of the growth medium removed and reduce the overall germination of rehabilitation species.

Where possible, growth medium will be stripped when moist to help maintain soil structure and to reduce dust generation. Growth medium, particularly clay soils, will not be stripped when excessively wet. Where possible, growth medium will not be stripped and handled in strong wind conditions to minimise dust generation.

2.4.1 STOCKPILING

During growth medium stockpiling:

- Locate stockpiles so that rehandling is minimised as this will result in further deterioration of the resource;
- Locate stockpiles in an area that is free draining to minimise sediment loss through erosion and waterlogging;
- Divert runoff from higher areas around the stockpile and install sediment controls where required;
- Minimise compaction during stockpile creation;
- Limit the stockpile height to a maximum of 4 m (where practical); and
- Set out stockpiles in windrows to maximise surface exposure and biological activity.

Stockpiles that will not be used for longer than three months should be vegetated to provide initial stability, maintain soil viability and minimise erosion.

A growth media inventory should be maintained to identify the soil requirements and availability of suitable soil on the licensed place must be submitted to the administering authority upon request.

2.5 BUSHFIRE RISK MANAGEMENT MEASURES

The Project is located within areas of high and medium potential bushfire intensity. The management of felled vegetation will take into consideration the increased bushfire risk associated with the storage, accumulation and handling of combustible materials associated with the Project.

Inappropriate stockpiling or prolonged retention of felled vegetation has the potential to increase fuel loads, contribute to fire intensity, and impede emergency response activities. Accordingly, felled vegetation will be managed in a manner that minimises bushfire risk. To reduce bushfire risk, vegetation will be stockpiled in smaller piles over a broader area.

Management measures have been proposed to ensure that the management of felled vegetation does not increase the Project's bushfire risk, including:

- **Weather based scheduling:** Clearing and vegetation management activities will be scheduled outside periods of elevated fire danger, including high risk weather conditions such as extreme heat, high winds, or declared fire danger periods.
- **Fire breaks:** Vegetation clearing for fire breaks may be conducted from time to time. Vegetation clearing will be performed in the immediate area around infrastructure to ensure a suitable buffer is maintained.
- **Defined stockpile locations:** Stockpiles will be located within previously cleared or disturbed areas and will maintain appropriate separation distances from undisturbed vegetation, infrastructure, waterways/ drainage lines and other stockpiles.
- **Short term reuse or removal:** Stockpiles will only be retained for the shortest period necessary to facilitate reuse or removal from Project site to avoid unnecessary accumulation of fuel build up.
- **Prohibition of burning:** Burning of felled vegetation will not occur.
- **Emergency access:** Maintain at all times access for firefighting vehicles and emergency response personnel, including around vegetation stockpile areas and along construction and access tracks.

Additional bushfire management measures are detailed in the Bushfire Management Plan developed for the Project.

3. MONITORING

During construction, MMG will monitor the effectiveness of the management actions contained within the PCVMP. The PCVMP will remain in place during the entirety of the Project, noting that the majority of vegetation clearing will occur during the construction phase, with possible minor clearing as a result of maintenance works or fire management required during the Projects operational phase.

Some monitoring measures include:

- Training/induction completion records;
- Review incident and corrective action logs;
- Reviewing fauna spotter-catcher records: number of relocations, injuries, mortalities.
- Undertaking inspections prior to, during, and post-clearing (with photographic evidence);
- Percentage of area affected by Class 1–3 weeds at 3, 6 and 12 months;
- ESC inspections as required by the ESC Management Plan;
- Turbidity or TSS monitoring downstream vs upstream (no significant difference attributable to works);
- Vegetation clearing remains within mapped, approved disturbance limits;
- No clearing outside of designated polygons or buffer zones; and
- Evidence of topsoil stockpiling and correct handling.

Where monitoring or observations determines that the existing management measures are not effective, the Proponent is to ensure that management actions are updated, or additional measures and corrective actions are implemented, as required, to ensure the effectiveness of the management actions of the PCVMP.

The PCVMP will undergo evaluations every three months during the period of construction. Following construction, the PCVMP will be evaluated on an annual basis during the operational phase. These periodic evaluations are set to ensure the PCVMP is continually effective, appropriate and relevant for managing cleared vegetation by the Project.

4. REFERENCES

Department of State Development, Infrastructure and Planning. (2025). *State code 27: Battery storage facility development Planning guideline*.

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