



# STUBBO SOLAR FARM

## Post-Approval Independent Audit

Moss Environmental  
1/342 Peel Street  
Tamworth NSW 2340

Stubbo Solar Farm  
Blue Springs Road  
Stubbo NSW 2852

Lead Environmental Auditor: Shonelle Gleeson Willey

Application number: SSD- 10452

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Certified by: Shonelle Gleeson-Willey, Director Moss Environmental

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## 1 EXECUTIVE SUMMARY

The Stubbo Solar Project is located near the township of Gulgong, in the Central Tablelands of regional New South Wales. The project is a State Significant Development (SSD-10452) and was granted development approval by the NSW State Government in June 2021.

ACEN Australia (ACEN) is the project owner and has engaged PCL Construction Pacific Rim Pty Ltd (PCL) as the engineering, procurement, and construction (EPC) contractor to manage the works for the 400 MW AC solar project and ancillary operational facilities.

ACEN has also engaged Transgrid as a second EPC to connect the Project to the transmission network used by Transgrid to provide transmission services. Which includes Switch yard construction to enable Transgrid to connect the Project to the transmission network. Transgrid engaged Zinfra as the delivery partner. Zinfra is a wholly owned subsidiary of SGSP (Australia) Assets Pty Ltd.

PCL engaged Moss Environmental to undertake independent environmental audits for the whole project (ACEN, PCL and Zinfra) in compliance with the SSD 10452 conditions of consent and Independent Audit-Post Approval Requirements (PAR, 2020).

The Post Approval Independent Audit was conducted on 20<sup>th</sup> September 2023 in accordance with the Department of Planning and Environment's, (The Department or DPE) *Independent Audit Post Approval Requirements (2020)* and the *Moss Environmental Standard Operating Procedure-Independent Auditing for State Significant Projects*.

The audit was undertaken using a three-step process of pre-assessment, site audit and inspection followed by gathering of requested documentation and audit report preparation.

Three non-compliances were recorded as part of this audit. They are in relation to the following conditions.

- NCR #1 – COC Sch 2, Cond2, and DPE Audit Requirements
- NCR #2 – COC Sch 3, Cond 2(a) & 3
- NCR #3 – DPE Audit Requirements 9

After the site audit, prior to finalisation of this report, two NCRs (#1 and #2) were addressed and closed-out by the Project.

Four opportunities for improvement were raised as a result of this audit. These are.

1. Additional dust suppression measures should be investigated and implemented. The auditor noted that a dust suppressant polymer and its application have already been organized with a Brisbane based company. The site was awaiting its arrival at the time of the audit. A comment from the contractor PCL during the audit response advised that the chemical dust suppressant has already been applied to parts of the site and will be continued in other work areas.
2. Install control as per the approved Erosion and Sediment Control Plan to stabilise the entry/exit point.
3. Investigate the root cause of NCRs and develop appropriate corrective actions. Monitor these corrective actions for implementation and effectiveness. NCR actions and close out should be addressed in the next audit.

4. Sch2, Cond 9 There were no records on the template provided by Zinfra for the Project Tools, Plant and Equipment Register. An updated register with all records of plant and equipment details and scheduled maintenance should be provided as evidence for this audit.

Overall, the project environmental performance is being carried out in a diligent and conscientious manner. The auditor observed that the management team and work crews all displayed a willingness to rectify any issues raised quickly and effectively. The Auditor was impressed by the emphasis the management team has placed on compliance and problem-solving. The following key strengths were noted.

- external stakeholder engagement is regular and well-delivered.
- Complaints and environmental incidents have been recorded and responded to appropriately.
- The management team is eager to engage with the management plans and source external professional assistance to provide the knowledge or skills for Plan development and implementation, as required.
- Good understanding of the site environmental requirements by all staff is evident.
- Waste segregation is in place and communicated well to site staff.
- Documentation is well managed, mostly up to date and complete.
- Strong emphasis on environmental compliance and problem solving from all personnel involved in the project.

## 2 INTRODUCTION

### 2.1 BACKGROUND

The Stubbo Solar project (the Project) is a 400 megawatt (MW) alternating current development with an allowance for future battery storage of up to 200 MW/2 hour. The project is located between Blue Springs Road and Barneys Reef Road, approximately 10km North of Gulgong and 85km east of Dubbo in New South Wales (NSW).

ACEN Australia (ACEN) is the project owner and has engaged PCL Construction Pacific Rim Pty Ltd (PCL) as the engineering, procurement, and construction (EPC) contractor to manage the works for the 400 MW AC solar project and ancillary operational facilities.

ACEN has also engaged Transgrid as a second EPC to connect the Project to the transmission network used by Transgrid to provide transmission services. Which includes Switch yard construction to enable Transgrid to connect the Project to the transmission network.

In a letter dated 10<sup>th</sup> May 2023, the Secretary approved the Applicant's proposal to develop the project in four stages, comprising:

- Stage 1: Road upgrades (Blue Springs Road) including construction of the main site access; and
- Stage 2: Solar project construction and operation including:
  - Stage 2a: Construction and commissioning of the solar facilities including solar array, substation, and all ancillary infrastructure, including the switchyard and transmission line connection to be constructed by Transgrid.
  - Stage 2b: Operation of the Stubbo Solar Project.
- Stage 3: Construction, commissioning, and operation of the Battery Energy Storage System (BESS), including substation and switchyard expansion (within the development footprint).
- Stage 4: Decommissioning of the Stubbo Solar Project at end of life.

PCL have engaged Moss Environmental to conduct this post-approval independent audit for Stage 2a, including all project works being managed by both PCL and Transgrid under ACEN.

This audit is in compliance with the SSD 10452 conditions of consent and Independent Audit-Post Approval Requirements (PAR, 2020).

## 2.2 PROJECT DETAILS

Description	Details
Project Name	Stubbo Solar Project
Project Application Number	SSD 10452
Project Address	Blue Springs Road, Stubbo, NSW, 2852
Project Phase	2a: Construction
Project Activity Summary	development of a 400MW alternating current solar farm

Table 1 Project details

## 2.3 AUDIT TEAM

Details of the Moss Environmental auditor for this audit was submitted to The Department. Endorsement by DPE of the following auditor was granted prior to the conduct of the audit, on 2<sup>nd</sup> May 2023 by Ms Katrina O'Reilly. Refer to **Appendix B**.

Name	Company
Shonelle Gleeson-Willey	Moss Environmental

Table 2 Audit Team

## 2.4 AUDIT OBJECTIVES

The objectives of this audit were to assess Stubbo Solar farm against the requirements of the approval conditions in SSD-10452, in accordance with the Departments *Independent Audit Post Approval Requirements (2020)*.

## 2.5 AUDIT SCOPE

The scope of this audit was developed in consultation with the Department of Planning and Environment and comprised an assessment of compliance with the requirements under Section 3.3 of the PAR (DPE 2020). To fulfil these requirements the audit included a review of the Stubbo Solar Farms systems, processes, and procedures, Management Plans and implementation of the environmental mitigation measures required from the Environmental Impact



Statement, Conditions of Approval, Management Plans, and industry standards to assess compliance. The management documents included in the audit were.

- Development consent SSD-10452.
- Independent Audit Post Approval Requirements.
- Stubbo Solar Farm, Environmental Impact Statement, Ramboll November 2020
- Environmental Management Strategy Stubbo Solar Stage 2a, V7, 23rd June 2023
- Construction Environmental Management Plan, Stubbo Solar, Stage 2a, 12<sup>th</sup> July 2023 and sub plans.
  - Accommodation and Employment Strategy – Stage 2a, V7, 7/7/2023.
  - Biodiversity Management Plan – Stage 2a, V3.5, 7/7/2023.
  - Bushfire Emergency Management & Operations Plan – Stage 2a, V1.3, 22/5/2023
  - Emergency Plan, Stage 2a, Rev 4, 17/05/2023.
  - Heritage Management Plan, Stage 2a, V3.4, 2/6/2023.
  - Soil and Water Management Plan, Stage 2a, V7, April 2023.
  - Traffic Management Plan, Stage 2a, Rev E, 7/7/2023.

The Post Approval Independent Audit was commenced on 17<sup>th</sup> August with the Pre-audit. The site component was conducted on 20<sup>th</sup> September – 21<sup>st</sup> September 2023 in accordance with the Departments *Independent Audit Post Approval Requirements (2020)* and the *Moss Environmental Standard Operating Procedure-Independent Auditing for State Significant Projects*. The scope of the audit was determined prior to the Preliminary Audit being conducted and is consistent with the conditions of Consent and Independent Audit-Post Approval Requirements (PAR, 2020) included as the site audit in **Appendix A**.

## 2.6 AUDIT PERIOD

Under Schedule 4, Condition 11-16 the audit “is to be conducted within 3 months of commencing construction, or as directed by the Secretary”. As outlined by the Department, it is noted that the commencement of construction occurred on the 20<sup>th</sup> of July 2023. In accordance with this condition, the site audit was commenced on the 20/9/2023.

This was the first independent environmental audit carried out by Moss Environmental on the project, the audit covered review of environmental documentation and records for works between 20<sup>th</sup> July 2023 and 21<sup>st</sup> September 2023.

This report is based on the results of evidence sampling and supplied documentation/records during the pre-audit document review (20<sup>th</sup> August – 19<sup>th</sup> July 2023) and review of site activities on the days of the site audit and inspection (20<sup>th</sup> and 21<sup>st</sup> September 2023).

## 3 AUDIT METHODOLOGY

### 3.1 SELECTION AND ENDORSEMENT OF AUDIT TEAM

The Audit Team has been approved by the Planning Secretary and endorsed by the NSW Government, DPE.

See **Appendix B** - Stubbo Solar Project - Auditor Endorsement (SSD-10452) Independent Environmental Audit letter.

### 3.2 INDEPENDENT AUDIT SCOPE OF DEVELOPMENT

This audit has been prepared, undertaken, and finalised in accordance with the Departments *Independent Audit Post Approval Requirements (2020)* and the relevant conditions of Development Consent. Moss Environmental developed the audit scope and a checklist based on the Project Development Consent Requirements SSD 10452, and consultation with the Department carried out both prior to the on-site component of the audit and post, Refer to **Appendix A and B**.

### 3.3 OPENING MEETING

The audit was conducted through a combination of remote auditing (through several document requests) and a site audit and inspection.

An opening meeting was held at the site on 20<sup>th</sup> September 2023 at 7:30am with ACEN, PCL and Transgrid project personnel and the Moss Environmental auditor, as per the Audit Meeting Attendee Register. Refer to **Appendix D** of this report.

The opening meeting was attended by the following:

- Matthew Vercie – ACEN WHS Advisor.
- Jace Wilby – PCL Construction Manager.
- Andrew Brine – PCL Project Manager.
- Phil McIver – PCL Construction Manager.
- Jenny Klease – PCL HSE Advisor.
- Sai Mogalla – PCL Junior Engineer.
- Mark Wintle – PCL Construction Manager.
- Sarah Hafez – ACEN Community Engagement.
- David McKay – ACEN Project Controls
- Jeff Ewert – PCL Senior Construction Manager
- Behzard Farzipour – PCL Lead Project Manager.
- Ravindra Kulkarni – ACEN.
- Patrick Millar – Ecosite Solutions (ACEN)
- Ajit Dhaliwal – Transgrid Project Manager

- Shonelle Gleeson-Willey – Moss Environmental Lead Auditor.

Key items which were discussed include:

- Confirmation of the type of audit including objectives, scope, and criteria.
- The audit timetable.
- Confirmation of the audit plan.
- Confirmation that resources for the audit were available.
- Explanation of the audit methodology.
- Presentation of draft Preliminary Audit Findings.
- Proponents' responsibilities for the audit.
- Confirmation of the status of previous audits.
- Proponents' expectations and objectives.

### 3.4 CONDUCT OF AUDIT

The audit activities included the following:

- Review of project documentation to verify compliance with Development Consent SSD 10452.
- Conducted the site audit by following the audit procedure and templates that were prepared by Moss Environmental based on the conditions of Development Consent.
- interviewing site personnel and a review of evidence provided to demonstrate compliance; and
- Conducted a site inspection to review implementation of mitigation measures, environmental controls, and post approval requirements.

Any findings from the audit and site inspection, and any action items were discussed with site personnel at the closing meeting.

The closing meeting was held on 21<sup>st</sup> September 2023 with representatives from ACEN, PCL and Zinfra/Transgrid. General feedback and the findings of the audit were discussed. The opening and closing meeting sign-on sheet is in **Appendix D**.

### 3.5 SITE INTERVIEWS

Site interviews were conducted using an interview template developed specifically for Stubbo Solar Farm and to reflect the Departments requirements and special areas for investigation through the audit. Site interviews were conducted with all project staff who attend site regularly and are in a managerial role. These included.

- Jace Wilby – PCL Construction Manager, Civil and Mechanical
- Andrew Brine – PCL Project Manager Civil
- Ian Eastman – A1 HSE Manager (Subcontractor to PCL)
- Justin Edwards – A1 Construction Manager (Subcontractor to PCL)

- Charlie Kemp – Zinfra Construction Manager
- Ajit Dhaliwal – Transgrid Project Manager

The results of the site audit interviews are provided in **Appendix G** and summarised below.

During the interviews staff were asked a series of questions focused on implementation of environmental management strategies, the general environmental principals, project stakeholder communication, air quality (dust), chain of command, employee understanding of their role related to environmental matters, incident management and environmental risk management.

The first section of questions focused on understanding of the main environmental strategies and project communications from the CEMP and how these strategies are implemented on-site. Every respondent mentioned that the strategies were covered within the environmental management plans with the aim of environmental protection and sustainability. The main issues of dust, fauna and flora, nuisance towards local communities and erosion and sediment control were regularly discussed. The erosion and sediment control management strategies discussed included regular inspections and expert advice on-site regularly. The responses to questions relating to the Environmental Management Strategy included reference to the regular environmental inspections, protection of the environment, rehabilitation, and environmental protection over the lifespan of the project. The responses from all staff were consistent, providing the auditor with a good level of confidence related to the teams understanding of the CEMP and related Management Plan requirements. When asked if the EMS is effective all respondents answered yes. Some expanded on this to say that it's still early days but so far, the site appears to be well managed and very professional, and that the management plans are well written and extensive in their information, and staff are still learning the content.

The auditor asked for interviewees to explain the General environmental principles. Some of the responses included.

- Clean site
- Do not damage the environment.
- No pollutants to escape site.
- Be responsible caretakers.
- Limit impacts on local communities
- Manage dust through dust suppression.
- Manage waste through segregation.

Whilst none of the interviewees explained all the principals each did have a good general understanding of the principals and the reason they are in place.

The project management structure includes several layers with the potential for poor communication resulting in issues or incidents. All interviewees were aware of the management structure and understood the lines of communication. However, the auditor observed outside these interviews that communication between ACEN, PCL and Zinfra is sometimes disjointed. Whilst the project uses Teambinder for contractual correspondence, less formal communication is not well shared despite the regular SimOps, project, production, and weekly meetings. This communication issue has resulted in Non-compliance with daily truck movements, discussed in Section 4.4.

The next section of questions focused on Air Quality and dust management. During the site inspection dust was noted as one of the more important environmental factors at this point of construction works. All interviewees agreed that

dust was a current issue and that appropriate measures were being put in place, including dust suppression via water carts, limiting vehicle movements and speed, stop work based on visual monitoring or via client direction, and daily weather monitoring. Jace Wilby also stated that whilst 13 work fronts were planned, only two were currently in construction and this staged approach was helping with dust minimisation.

The next few questions focused on Chain of Command internal and external to the project. The PCL interviewees discussed the chain of command as flowing up through PCL to HQ and back down again through lessons learnt and information dissemination. The interviewees from A1 described the chain of command as site to the senior managers from the head office in Mudgee. Then between these two groups and the MAAS Group which is the parent company. Zinfra interviewees stated that the chain of command is from the Site Manager to the Transgrid Construction Manager, Project Manager and Engineer, via phone calls and Teambinder. Zinfra is part of the Jemina parent company.

The next questions related to the interviewees' understanding of their role in environmental management and if this was detailed in their position description. The respondents did not expand very much on their position descriptions other than to say they had one and that they understood their roles. It was stated that the Health and Safety Management Plan identified the roles and responsibilities, and an internal PCL safety management plan also includes these. Toolbox talks were mentioned as a way that the environmental requirements of positions were communicated.

The final sections related to incident and risk management. and respondents were asked to discuss their role in incident management for the project. Each respondent has a slightly different understanding of incident management on the project, and everyone has a slightly different role. The interviewee from A1 stated that incident management is a Collaborative role. The Construction Manager is the first point of call for the operator. There will be initial investigations started by the Construction Manager. For something major such as a fire across the site or nearby, A1 would assist with their water carts. As the sub-contractor they are under the instruction of the principle. They have their own spill kits in every machine and wheelie bin spill kits. One of the Construction Managers interviewed from PCL was able to provide a very thorough response. He stated that he does/would get called to a lot of incidents, and takes care of the investigation recording, witness statements, managing the site and coordinating the investigation. He then identifies the medical needs. For minor incidents he makes sure there's appropriate spill kits. He also makes sure the training paperwork and site-based paperwork is completed. The operator would call the site supervisor, who would call the HSE Supervisor from PCL, who would call the available Construction manager (these two would go to site), the HES managers would fill out the paperwork for the incident investigation. The HSE team would document into SMC (Safety Management Centre) and a PM's name would be associated with it, and there will be a requirement for them to sign off. It is then the PMs reporting requirement to send the report to ACEN. The Construction Manager knows it is a requirement to report to ACEN but was not sure about the timeframes. None of the responders were able to confidently provide a response to the question of reporting timeframes.

The last section related to Risk Management, particularly environmental risk. This question has no right or wrong answer and responses are based on each individual's knowledge and risk appetite. When asked about the biggest environmental risk to the project the following responses were given.

1. Dust
2. Daily truck movements
3. Unusual, extended weather events
4. Environmental spills and contamination
5. Project completion on-time

6. Bushfire
7. Heat
8. weeds

### 3.6 SITE INSPECTIONS

The site inspection was carried out by the auditor and Mr. Jace Wilby on 20<sup>th</sup> September 2023. The inspection assessed the implementation of environmental controls and concentrated on the following general areas from the conditions of consent.

- Traffic Management.
- Dust suppression.
- Progressive revegetation.
- Fuel and chemicals.
- Waterway crossings.
- Plant and equipment maintenance.
- Landholder consultation and engagement.
- Vegetation planting.
- Retained vegetation.
- Weed management.
- Vehicle management.
- Erosion and Sediment Control.
- Site Training.
- Truck movements.
- Visual Impacts.
- Heritage.
- Fire Management.
- Waste Management.
- EIS Mitigation measures.

The site inspection notes and photographs can be found in **Appendix F**.

The site received threenon-compliant reports (NCR) from the conditions of consent assessed as part of the desktop audit and site inspection, discussed in Section 4.12.

### 3.7 CONSULTATION

Consultation with DPE was conducted on 14<sup>th</sup> August, 15<sup>th</sup> September and 4<sup>th</sup> October 2023 prior to and post the audit. DPE requested that during the audit particular attention was given to the following:

- Evidence of all relevant management plans have been approved prior to the road upgrades, construction etc.

- Road upgrades undertaken in accordance with Council and TfNSW requirements and evidence of undertaken prior to works occurring on-site.
- Evidence of compliance with access via approved entry and exit points.
- Evidence of appropriate certificates obtained such as CC and OCs.
- Evidence of Compliance with all commitments and actions required under all management plans (such as measures to protected flora/fauna, minimise soil and water impacts, monitoring, reporting to relevant agencies/bodies etc.
- Evidence of compliance with the CEMP.
- Evidence of community enhancement (VPA).
- Appropriate erosion and sedimentation measure/controls are in place.
- Appropriate measures in place for minimise tracking onto the external road network.
- Evidence of groundcover establishment and management.
- Evidence that nay clearing has complied with EIS.
- Assessment of predicted versus actual impacts of the development.
- Compliance with biodiversity offset requirements.
- Compliance with noise requirements.
- Measures and monitoring programs to minimise dust as a result of the development.
- Evidence of protection of heritage items
- Evidence of measures/plans/programs being implemented to ensure water is being managed on site and no impact offsite due to water being diverted and or sediment laden water being diverted off site causing impacts on neighbours' properties (condition 26 c).
- Evidence that the Soil and Water Management Plan has been developed in consultation with DPE Water.
- Measures and programs to minimise waste management on-site.
- Management, recording, actioning, and implementation of complaints register and for non-compliances and incidents.
- Website for development up to date.

Requests for consultation were emailed to the following on 29th September 2023.

- Mudgee Local Aboriginal Lands Council.
- Biodiversity Conservation and Science Directorate, Department of Planning and Environment
- Mid-Western Regional Council
- DPE-Water
- Fire and Rescue New South Wales
- Heritage New South Wales
- Rural Fire Service
- Transport for New South Wales

Responses were received from the following.

National Parks and Wildlife Service, Ms Lisa Menke – referred the request to the BCS Northwest mailbox and advised that NPWS lands are not in close proximity so no consultation necessary.

Heritage NSW, Ms Nicole Davis – advised that HNSW receives many requests for consultation for post-approval audits and do not have the capacity to undertake additional engagement outside the formal DPE planning process.

Mid-Western Regional Council, Alina Azar – advised that there are no specific comments or issues that have been brought to Council’s attention that would be applicable to the scope of the audit.

Feedback was not received from the remaining agencies contacted.

Refer to **Appendix C** for records of the consultation and responses.

### 3.8 COMPLIANCE STATUS DESCRIPTORS

The following audit criteria were used for the rating of audit findings.

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

Table 3 Compliance Status Descriptors (PAR, 2020)



## 4 AUDIT FINDINGS

### 4.1 APPROVAL AND DOCUMENT LIST

The following documents, email correspondence and plans were reviewed as part of the audit:

#### 4.1.1 REPORT / PLANS

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- Stubbo Solar Farm, Environmental Impact Statement, Ramboll, 22/11/2020
- Stubbo Solar Farm, Construction Environmental Management Plan (CEMP Stage 2a) (from website)
- Stubbo Solar Farm, Accommodation and Employment Strategy, Stage 2a, 7/7/2023 (from website)
- Stubbo Solar Farm, Biodiversity Management Plan-Stage 2a, V3.0, July 2023 (from website)
- Stubbo Solar Farm, Bushfire Emergency Management & Operations Plan, Stage 2a, V1.3, 22 May 2023 (from website)
- Stubbo Solar Stage 2a, Emergency Response Plan, 17/5/2023 (from website)
- Stubbo Solar Farm, Environmental Management Strategy, Stage 2a, V7, 23 June 2023 (from website)
- Stubbo Solar Project, Heritage Management Plan Stage 2a, V3.4, 2/6/2023 (from website)
- Stubbo Solar Project, Soil and Water Management Plan, Stage 2a, V7, 26 April 2023 (from website)
- Stubbo Solar Project, Traffic Management Plan, Stage 2a, RevE, 7/7/2023 (from website)
- STSP – Final layout plan-DWG-100
- Stubbo Solar Project, Project Execution Plan, Rev 1, 10/3/2023
- Pre-clearance report V2.1
- Zinfra P810053\_EN-PL-001 CEMP-SS Stubbo Rev 2.2
- Zinfra P810053-HS-PL-002 Emergency Response Plan Rev B
- Zinfra 211295.04. C001.Rev0. Stripped surface inspection
- Zinfra P810053-EN-PL-001 CEMP-SS Stubbo Rev 2.2
- Zinfra P810053-HS-PL-002 Emergency Response Plan Rev B

#### 4.1.2 PROTOCOLS/POLICIES/REGISTERS/PROCEDURES

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- ACEN Employment Register, Aug 2023
- ACEN Complaints Register Aug 2023
- ACEN Accommodation Types Utilised August 2023
- PCL 02.29 Stubbo Solar – Permit Register, June 2023
- PCL STSP-SMEC-CW-00GRL-REP-005
- PCL Fauna strike log
- PCL HSE-STSP-REG-Register
- PCL Heavy Vehicle Movement Log August 2023
- PCL Heavy Vehicle Movement Log September 2023
- Zinfra Code of Conduct
- Zinfra Asset\_Records\_for\_job\_no\_4541226 Fire Extinguisher Test Results
- Zinfra G-CN-FM-12147 Project Tools, Plant and Equipment Register
- Zinfra G-HS-FM-00377 First Aid Assessment Template

- Zinfra G-HS-FM-00694 Electrical Equipment Register
- Zinfra JAA SHE FM 0051 Site Attendance Register
- Zinfra JAA HSE TP 0026 Site Facilities Checklist
- Zinfra JAA HSE TP 0026 Hazard Control Permit Register
- Zinfra JAA QM TP 0009 IMTE Register
- Zinfra Stubbo Switchyard- First Aid Register
- Zinfra Stubbo Switchyard- First Aid Register
- Zinfra Stubbo Switchyard- Spill Kit Register
- Zinfra Stubbo Switching Station - Hazardous Substances Register 15072023
- Zinfra Stubbo Waste Register
- Zinfra G-EN-FM-00077 - Vehicle Clean Down Checklist 1PP 4SW.
- Zinfra Stubbo Switching Station - Hazardous Substances Register 09082023
- Zinfra Vehicle Tracking Sheet

#### 4.1.3 DESIGNS/DRAWINGS

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- PCL Civil - IFC Civil 30%\_drawing set, SMEC, 27/04/2023
- PCL Combined 30% Electrical Drawing set, SMEC, 26/04/2023.
- Zinfra P810053-HS- Stubbo Solar - Emergency Evacuation Diagram

#### 4.1.4 PRESENTATIONS/INDUCTIONS

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- PCL Induction – Short duration worker.
- PCL Induction HSE orientation checklist – Australia.
- Stubbo Solar Farm Delivery Driver Induction completed examples (18).
- Stubbo Solar Farm Project Safety Overview, Rev 5.
- Zinfra Stubbo induction
- Zinfra JAA HSE FM 0051 Full Induction Record
- Zinfra Stubbo - Pre-Start Brief Fluix v1-3 25072023
- Zinfra Stubbo- Pre-Start Brief Fluix v1-2 – 20230724
- Zinfra Stubbo Switchyard - Pre-Start Brief v1 - July 27, 2023, 19-16-02 UTC
- Zinfra Stubbo Switchyard - Pre-Start Brief v1 - July 28, 2023, 22-19-22 UTC
- Zinfra Stubbo Switchyard - Pre-Start Brief v1 - July 31, 2023, 21-25-22 UTC
- Zinfra Toolbox Meeting Minutes 1-8-23

#### 4.1.5 COMMUNITY NOTIFICATIONS

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- PCL Notification of Commencing Construction Stage 2a

#### 4.1.6 ENVIRONMENTAL INSPECTIONS

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- PCL 20230801-2-Inspection photos
- PCL 20230908-Weekly Inspection Checklist
- PCL Daily Inspection Checklist 230906

- PCL Monthly Inspection Checklist-TM 230902
- PCL Weekly Inspection Checklist
- Zinfra - 211295.04. C.001.Rev0. Stripped surface inspection
- Zinfra JAA HSE FM 0077
- Zinfra Aspire Register Environmental Inspections

#### 4.1.7 FLOOD MODELLING AND WATER MANAGEMENT

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- Flood study raw data, TUFLOW, 1/10/2020

#### 4.1.8 ROAD MANAGEMENT AND DILAPIDATION

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- Attachment A-MWRC-Blue Springs Road
- NSW212453\_R01.01 Dilapidation Report\_200123
- 19.14369-Jul23, Dilapidation Report-Stubbo Solar Farm
- NSW212453-IFC-Rev02-C103-001
- NSW212453-IFC-Rev02-C105-001
- NSW212453-IFC-Rev02-C106-001
- NSW212453-IFC-Rev02-C108-001

#### 4.1.9 EROSION AND SEDIMENT CONTROL

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- PCL Stubbo\_ESCP\_v5
- PCL SMEC Civil IFC Hydrology Combined
- PCL STSP\_Vital Chemical Subcontract
- PCL Appendix 13-Erosion and Sediment Control Plan\_Stubbo Solar Farm\_Rev1
- PCL Appendix A and B – ESCP Plans and Typical Details\_Stubbo Solar Farm\_Rev B
- Zinfra Erosion and Sediment Control Plans Rev 1

#### 4.1.10 SITE PLAN

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- PCL Final Layout Plan – DWG-100 – 104 (from website)
- PCL Final Layout Plan – Stage 2a. Correspondence, 9/6/2023 (from website)

#### 4.1.11 TRAFFIC MANAGEMENT

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- PCL Stubbo Solar Project Safety Overview Rev 4
- PCL TMP signed acknowledgment-sample.
- ACEN 3 Week Truck Tracker

#### 4.1.12 EMAILS

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- Email – PCL Subdivision correspondence
- Email – PCL CAA inquiry-Creek Crossings-Response

- CC-3485612-CC-Client
- CC-3485612-PCA-Appointment-Client
- Email – PCL Re\_STSP-Using Farm Dam Water
- Email – Zinfra Pre-clearance inspection Stubbo, 26/07/2023
- Email – Zinfra Topsoil Removal Geotech Report, 10/08/2023
- Email – Zinfra Stockpile management and re-seeding, 2/09/2023
- Email - Zinfra Re: Approved water source – change request.
- Email – FW: receipt for sale of keys for water supply from Ironbuilt Infrastructure

#### 4.1.13 APPROVAL DOCUMENTS/LETTER

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- Stubbo Solar Planning Agreement
- Notification of Commencement of Construction, Approval Letter, 7/7/2023
- Certificate of activities: Stubbo Solar Project, OzArk, 25/08/2023
- Stubbo Solar Emergency Plan\_DPE acknowledgement\_20230601
- 13982-Substation DP (Admins)-26.06.23
- 1382-Substation DP-26.06.23(98)
- Stubbo Solar Project-Revised Staging Request, DPE, 10/05/2023
- 230523\_Biodiversity Offset Retirement
- Post Approval Form\_20230522235818
- Stubbo Solar Farm – (SSD-10452), Independent Environmental Audit – auditor approval request May 2023, 2/05/2023
- SSD Assessment Report Stubbo Solar Farm
- STSP Development Consent SSD-10452
- Stubbo Solar Farm, Construction Environmental Management Plan (CEMP Stage 2a) Approval Letter, 7/7/2023 (from website)
- Stubbo Solar Farm, Accommodation and Employment Strategy, Stage 2a, Approval Letter (from website)
- Stubbo Solar Farm, Biodiversity Management Plan-Stage 2a, Approval Letter, 8<sup>th</sup> July 2023 (from website)
- Stubbo Solar Farm, Bushfire Emergency Management & Operations Plan, Stage 2a, V1.3, 22 May 2023 (from website)
- Stubbo Solar Stage 2a, Emergency Response Plan, 17/5/2023 (from website)
- Stubbo Solar Farm, Environmental Management Strategy, Stage 2a, Approval Letter, 27 June 2023 (from website)
- Stubbo Solar Project, Heritage Management Plan Stage 2a, Approval Letter, 21/6/2023 (from website)
- Stubbo Solar Project, Soil and Water Management Plan, Stage 2a, Approval Letter, 6 June 2023 (from website)
- Stubbo Solar Project, Traffic Management Plan, Stage 2a, Approval Letter, 7/7/2023 (from website)

#### 4.1.14 OTHER

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- PCL Example environmental incident reports, various 2022/23
- PCL Daily prestart meeting sign On.
- PCL Toolbox meeting\_-nesting Plovers

- PCL Weed poster.
- STSP-Construction Chat, PCL management team
- PCL DA11VH Weed & Seed 16.03.24.
- PCL Vermeer S925TX-Weed Seed
- PCL Weed & Seed Declaration
- PCL Photo Evidence-North-South Creek Crossing
- ACEN Stubbo 1 PTY LTD ATF Stubbo Solar Project Trust Invoice 240310
- Water Cart Dockets
- Zinfra Jobcard\_For\_Job\_No\_4541226\_07-08-2023\_1419 Fire Extinguishers
- DPE Post Approval Review Table

## 4.2 COMPLIANCE PERFORMANCE

The audit determined that Stubbo Solar Project has generally implemented the project specific environmental controls within the construction and management activities being undertaken, however three non-compliances were recorded and two subsequently rectified and/or managed then closed out post-audit. The comparison of audit findings and compliance ratings is as follows:

SSD Requirements	Findings
Conditions of Consent	Compliant - 46
	Non-compliant - 2
	Not Triggered - 12
Post Approval Requirements	Compliant - 15
	Non-compliant - 0
	Not Triggered - 3
DPE Audit Requirements	Compliant - 20
	Non-compliant – 1
	Not Triggered - 0

Table 4 comparison of audit findings and compliance ratings

## 4.3 SUMMARY OF AGENCY NOTICES, ORDERS, PENALTY NOTICES OR PROSECUTIONS

Stubbo Solar Project noted that no agency notices, orders, penalty notices or prosecutions have been issued. One reportable non-compliance was discovered at the time of the audit because of standard project procedure and immediately investigated by ACEN, PCL and Zinfra. The auditor was informed as part of the audit process. DPE was verbally notified on 27/9/23 after the non-compliance was confirmed, during the investigation process. The non-

compliance related to the Traffic Management Plan and the approved number of heavy vehicles allowed to access the site per day. This number was exceeded over several days. This resulted in NCR # 2.

It was originally documented that the NCR reporting to DPE was not within the required timeframe, and an NCR recorded in the draft report.

The following response was provided by PCL/ACEN and Zinfra as part of the Proponent review and response to the draft report.

“Whilst the potential truck movement exceedance non-compliances were identified at the time of the audit on 20/9/2023, it was not until 22/9/2023 and following the initial verification processes, that the project team was satisfied that non-compliances had occurred.

ACEN submitted its non-compliance report to DPE on 29/9/2023, within 7 days of becoming aware of the NC on 22/9/2023 and following additional verification activities and review of corrective actions implemented by PCL and Zinfra to address the non-compliances.

It should also be noted that the potential truck movement exceedances initially identified at the time of the audit on 20/9/2023 were subsequently decreased upon verification of vehicle registration details and associated vehicle classifications due to the erroneous inclusion of some light vehicles in the heavy vehicle movement records”.

As a result of this response the NCR related to CoC Schedule 4, Condition 8,9,10 and PAR Section 3.3, 2C has been amended to a Compliant status. Opportunity for improvement #6 relates to this issue, because the audit found several small issues with communication, noted in the staff interviews (no knowledge of reporting timeframes for incidents), during audit preparation and detailed in NCR #2.

#### 4.4 PREVIOUS AUDIT RECOMMENDATIONS

This is the first independent audit conducted and as such there are no previous audit recommendations which needed to be assessed for close out.

#### 4.5 EMP, SUB-PLANS AND COMPLIANCE DOCUMENTS

The management plans were reviewed and considered generally adequate and having identified suitable controls for managing environmental impacts of the project, apart from the Erosion and Sediment Control Plan. The ESCP doesn't include the requirement for waterway crossings to be designed in accordance with the Policy and Guideline for Fish Friendly Waterway Crossings (DPI). Whilst all vehicle crossings on-site are suitable as fish-friendly crossings, an in-stream sediment control structure installed on-site is not. This is recorded as NCR #1.

#### 4.6 COMPLAINTS

A Complaints Register is maintained by ACEN where information regarding complaints is recorded, including the relevant resolution. The register is not currently available on the website. A summary of the complaints is below.

Date recieved	Complaint summary	Response and resolution	Date resolved
25/07/2023	The resident was driving south on Blue Springs Rd, and she was approaching the site entrance junction, a delivery truck cut her off, forcing her to break and slow down. The truck had a 'Snowy/Southern (?) Mountain'.	Investigations as to which company this truck was from and will be addressed to the relevant company. (BF) A STOP sign will be erected (26 July) to make all vehicles stop before exiting the site.	STOP sign erected (27 July 2023). Spoke to resident she was very happy that we followed up and we now have a STOP sign.
10/08/2023	When working on the Blue Springs and Cope Road intersection, setting out for new line marking. A delivery truck travelling from Stubbo site towards the intersection approached the site too quickly and locked up all breaks upon approaching intersection.	PCL reached out to supplier, they requested transport company to make sure the drivers are adhering to the sign posted speed limits to and from site. PCL also raised concerns with the roads not having adequate warning signs for approaching the intersection, which needs to be addressed by the Council	14/08/2023

Table 5 Summary of the complaints as per Complaints Register

## 4.7 INCIDENTS

Five environmental corrective / preventative actions and no incidents have been recorded for the PCL project and zero for the Zinfra Project which is described in section 4.4.

Date	Description	Action taken	Close out date
4/8/2023	Weeds/Dirt /Oil on drill rigs 12 & 13	Remove weed & mud from previous site and clean and remove all waste including oil. Remove Hook on machine	8/5/2023
4/8/2023	Inadequate signage around enviro;/ heritage areas	Purchase or develop signage for environmental / heritage areas	
4/8/2023	Concrete wash out - inadequate. No signage, flows across road, no installed as a functioning wash out	Rectification of bund, signage installed, and caps placed on pickets.	8/9/2023
4/8/2023	Sediment controls lacking	Due to the nature of the soil (dispersive) no sediment is needed a soil bund is to be built around the stockpile	
29/08/2023	Dust throughout the site	Dust suppression via water cart in use	ongoing

Table 6: Corrective / preventative actions

## 4.8 ACTUAL VERSUS PREDICTED ENVIRONMENTAL IMPACTS

There is no significant change or additional impacts noted for the construction phase of the Stubbo Solar project, that were not identified in the EIS, based on the document audit and site inspection. However, most of the environmental monitoring is visual and comparison of impacts such as noise, water quality, dust and impact to local fauna can only be assessed through Complaints and Incident reporting. The Biodiversity Management Plan includes bird monitoring and adaptive management; however, this will not commence till later in the program.

The complaints received relate to delivery truck's driving in a potentially dangerous fashion and incidents. The preventative / corrective actions relate to weed and seed, no-go signage, poor concrete washout design, lack of sediment controls and dust. There was one NCR recorded at the time of the audit, relating to the exceedance of allowed daily truck movements on/off site. There are no recorded environmental incidents.



## 4.9 SITE INSPECTION

The site inspection was conducted on 20<sup>th</sup> September 2023. The Moss Environmental auditor, and PCL Construction Manager drove and walked over the site, observing site activities and compliance with environmental control and mitigation measures. The environmental controls observed included:

- Wetting of area and roadways for dust suppression, dust.
- Revegetation areas and strike rate.
- Weed management.
- Waterway crossings.
- Emergency Management and sign posting.
- Evidence of appropriate fuel and chemical storage.
- Landholder sentiment.
- Retained vegetation.
- Site Parking.
- Erosion and Sediment Controls.
- Site environmental information.
- Front entrance signage.
- Site lighting.
- Heritage and no-go zone delineation.
- APZ area management.
- Evidence of the resource recovery hierarchy
- General site housekeeping.
- Management of Aboriginal Site (Rosevale IF-01)
- Perimeter fencing
- Spacing of array.
- State of local road (Blue Springs Road).
- Farm dam usage
- Monitored and sign-posted site speed limit.
- Mud and debris are being effectively managed from being tracked out onto public roads.

Three issues were raised during the site inspection. These resulted in the recording of NCR#1 and #3 from Tab 7. And the below opportunities for improvement with associated action items, also recorded in Table 8.

### **Issue/opportunity for improvement 1**

Dust is currently the main environmental issue observed on-site. Dust clouds from vehicle movements were noted on-site during the inspection.

### **Action item**

Additional dust suppression measures should be investigated and implemented. The auditor noted that a dust suppressant polymer and its application have already been organized with a Brisbane based company. The site is awaiting its arrival.

### **Issue / opportunity for improvement 2**

The site entrance is not stabilized, resulting in high potential for tracking of mud onto the local road. There is no rumble grid (cattle grid) installed. The site inspection found no excessive tracking of dirt and mud at the time of the inspection.

### **Action item**

Install control as per the approved Erosion and Sediment Control Plan to stabilise the entry/exit point.

Please refer to the site inspection in **Appendix F**.

## **4.10 ENVIRONMENTAL PERFORMANCE**

This is the first independent site audit conducted on this project. Therefore, there were no action items from previous audits to assess.

Overall environmental performance was assessed and where poor or an area for improvement identified, a non-compliance or recommendation was given, and an action was raised. Non-compliances and action items are discussed in section 5.

Three non-compliances were recorded as part of the audit, presented in Section 4.12. These are all considered minor non-compliances, since none of those identified was likely to result in actual environmental harm, if rectified quickly. It has been confirmed that the project team did rectify and close-out these NCRs prior to finalisation of this report. During the audit it was evident that ACEN, PCL and Zinfra displayed a pro-active approach to rectification and commenced action quickly once alerted to the NCR, and all other opportunities for improvement.

## **4.11 KEY STRENGTHS**

Overall, the project environmental performance is being carried out in a diligent and conscientious manner. The auditor observed that the management team and work crews all displayed a willingness to rectify any issues raised quickly and effectively. The Auditor was impressed by the emphasis the management team has placed on compliance and problem-solving. The following key strengths were noted.

- external stakeholder engagement is regular and well-delivered.
- Complaints and environmental incidents have been recorded and responded to appropriately.
- The management team is eager to engage with the management plans and source external professional assistance to provide the knowledge or skills for Plan development and implementation, as required.
- The good understanding of the site environmental requirements by all staff is evident.
- Waste segregation is in place and communicated well to site staff.
- Documentation is well managed, mostly up to date and complete.

#### 4.12 NON-COMPLIANCES

There were six non-compliances initially recorded as part of this audit, however the audit report recorded this as four non-compliances due to the inter-related nature of the TMP non-compliance reported for the Conditions of Consent and DPE Audit Requirements. This was later reduced to three as a result of additional information and the Proponent review and response.

Non-compliance identification	SSD Requirement document	Reference	Details
1	Conditions of Consent	Sch 2, Cond2	Within the EIS (Mitigation measure B13, W7), all site waterway crossings are required to be designed in accordance with the Policy and Guideline for Fish Friendly Waterway Crossings (DPI). The ESCP doesn't state that works/plans will be in accordance with this Policy or Guideline, therefore one of the erosion and sediment controls designed for the site, within a creek crossing doesn't allow fish passage. When this was identified during the audit, the site immediately commenced rectifying the problem by reaching out to the ESCP designers and modifying the structure.
2	Conditions of Consent	Sch 3, Cond 2(a) & 3	On 20/9/23 it was identified through standard site procedures that the total number of heavy vehicle movements allowed per day (60) during construction had been exceeded across several consecutive days.
3	DPE Audit Scope Requirements	9	Appropriate measures are not in place to minimize tracking of material onto the public road.

Table 7 Non-compliance recorded from audit.

The resulting recommendations and opportunities for improvement are explained further in Section 5.

## 5 RECOMMENDATIONS

Four recommendations have been raised because of this audit. These recommendations are based on the reviewed project documentation and site inspection.

Recommendations / Opportunities for improvement
<p>4. Additional dust suppression measures should be investigated and implemented. The auditor noted that a dust suppressant polymer and its application have already been organized with a Brisbane based company. The site was awaiting its arrival at the time of the audit. During the audit response period the site has applied the polymer to sections of the site. The application should be finalized and then undergo regular checks to ensure the concentration of the application was adequate.</p>
<p>5. Install control as per the approved Erosion and Sediment Control Plan to stabilise the entry/exit point.</p>
<p>6. Investigate the root cause of NCRs and develop appropriate corrective actions. Monitor these corrective actions for implementation and effectiveness. NCR actions and close out should be addressed in the next audit.</p>
<p>7. Sch2, Cond 9 There were no records on the template provided by Zinfra for the Project Tools, Plant and Equipment Register. An updated register with all records of plant and equipment details and scheduled maintenance should be provided as evidence for this audit.</p>

Table 8 Recommendations / Opportunities for Improvement

## 6 CONCLUSION

Stubbo Solar Project achieved a score of 94.74% compliance for the Conditions of Consent, and 94.44% for the Post Approval Requirements in the Moss Environmental auditing system which is based on the *Independent Audit Post Approval Requirements (2020)* and the *Moss Environmental Standard Operating Procedure-Independent Auditing for State Significant Projects*.

The audit resulted in:

- 2 non-compliance.
- 4 recommendations / Opportunities for improvement to be assessed during the next audit.

Post the site audit and prior to preparing this report, ACEN and PCL advised that the following NCRs had been addressed and closed out with the presented actions.

### 6.1 NCR AND RECOMMENDATION CLOSE-OUT

Non-compliance identification	SSD Requirement document	Reference	Details	Close-out details
1	Conditions of Consent	Sch 2, Cond2	Within the EIS (Mitigation measure B13, W7), all site waterway crossings are required to be designed in accordance with the Policy and Guideline for Fish Friendly Waterway Crossings (DPI). The ESCP doesn't state that works/plans will be in accordance with this Policy or Guideline, therefore one of the erosion and sediment controls designed for the site, within a creek crossing doesn't allow fish passage. When this was identified during the audit, the site immediately commenced rectifying the problem by reaching out to the ESCP designers and modifying the structure.	Prior to finalising the audit report, advice was sought from SMEC, the designers. The erosion and sediment control were rectified to allow fish passage. Photos of rectification provided to auditor.
2	Conditions of Consent and DPE Audit Requirements	Sch 3, Cond 2(a) & 3	During the audit, it was discovered that the total number of heavy vehicle movements allowed per day (60) during construction had been exceeded across several consecutive days.	Prior to finalising the audit report a root cause analysis was conducted by ACEN/PCL/Zinfra. It was determined that miscommunication during

				and after the SimOps meetings had resulted in an unclear understanding of the allocations. A renewed focus on the truck movements during SimOps and implementation of a 3-week look ahead has been put in place.
<b>Opportunity for Improvement</b>				
7	Conditions of Consent and DPE Audit Requirements	Sch 2, Cond 9	Zinfra provided a template for the Project Tools, Plant and Equipment Register. No records recorded.	Prior to finalising the audit report the completed register provided as evidence.
<b>NCRs identified during the draft audit, subsequently revised to non-NCR</b>				
NA	Post Approval Requirements	Section 3.3, 2C	The NCR identified on 20/9/2023, being several days where the maximum number of daily heavy vehicle movements to/from site was exceeded, was not reported to DPE within the required reporting timeframe. The NCR was reported to DPE 15 days after the non-compliance occurred. However, it was submitted within 8 days of becoming aware of the NC.	Additional detail provided during audit report response included verbal notification to DPE within the required timeframe. This resulted in the NC being revised to compliant status.

Table 9: Close-out of NCRs



**MOSS**  
ENVIRONMENTAL

## **7 APPENDIX**

### **7.1 APPENDIX A – INDEPENDENT AUDIT TABLE**

DPE Request	Question	Information	Evidence collected	Audit finding	Compliance Status	NCRID
1	Evidence of all relevant management plans have been approved prior to road upgrades, construction etc.		1. Accommodation and Employment Strategy Approval Letter, 7/7/2023 2. Biodiversity Management Plan- Stage 2 Approval Letter, 8/7/2023 3. CEMP Stage 2- Approval letter, 13/7/2023 4. Emergency Management Strategy Approval letter, 27/06/2023 5. Heritage Management Plan Approval letter, 21/06/2023 6. Soil and Water Management Plan Approval Letter, 6/6/2023 7. Traffic Management Plan Stage 2a Approval Letter, 7/7/2023	Compliant. All required approvals sought and obtained.	Compliant	
2	Road upgrades undertaken in accordance with Council and TfNSW requirements and evidence of undertaken prior to works occurring on site.		1. Awaiting MidWestern Regional Council consultation letter. 2. NSW212453_R01.01_Dilapidation Report_200123 3. ACEN Blue Springs Road Letter 10 May 2023 from Julian Geddes	Evidence 3 - Letter wording. Please be advised Council confirms that the upgrade to Blue Springs Road has been completed to the satisfaction of Council as the Roads Authority and as per the approved design.	Compliant	
3	Evidence of compliance with access via approved entry and exit points.		1. TMP signed acknowledgement - sample 2. Stubbo Solar Project Safety Overview Rev 4	The documentation provided shows the approved access point clearly. This is communicated to everyone coming to site via the induction process and delivery driver orientation.	Compliant	
4	Evidence of appropriate certificates obtained such as CC and OCs		1. 13982-Substation DP-26.06.23[98] 2. Mail - Subdivision correspondence 3. 13982-Substation DP (Admins)-26.06.23 4. CC-3485612-CC - Client	evidence provided.	Compliant	
5	Evidence of Compliance with all commitments and actions required under all management plans (such as measures to protected flora/fauna, minimise soil and water impacts, monitoring, reporting to relevant agencies/bodies etc).		2 x NCR from COC audit	All management plan commitments are being complied with.	Compliant	
6	Evidence of compliance with the CEMP.			Refer to COC Audit findings	Compliant	
7	Evidence of community enhancement (VPA entered into)		1. Stubbo Solar Farm Planning Agreement, 3/11/2022	The Voluntary Planning Agreement is in place.	Compliant	
8	Appropriate erosion and sedimentation measures/controls are in place.		1. SMEC Civil IFC Hydrology Combined, 1/9/2023	The site inspection confirmed that the controls on-site match the current ESCP.	Compliant	
9	Appropriate measures in place for minimise tracking of material onto the external road network.			There is no rumble grid in place at the site entrance which is a requirement of the CEMP and ESCP.	Non-Compliant	NCR#3
10	Evidence of groundcover establishment and management.		Refer to site inspection for evidence	Photographic evidence collected during site inspection. Strike was recent and had not yet achieved the required coverage for stabilisation, however it was evident that the regrowth after burn off was likely to be achieved within the required timeframe.	Compliant	
11	Assessment of Predicted vs actual impacts of the development.			So far all impacts are in line with those predicted and the mitigation measures are mostly in place and successful. There is limited monitoring, especially off-site as this is not required under the approvals. Therefore it is difficult to determine the details of actual impact other than through complaints, visual observations and incidents.	Compliant	
12	Compliance with biodiversity offset requirements.		1. 230523_-_Biodiversity Offset Retirement2. Post Approval Form_20230522235	evidence of set retirement provided.	Compliant	
13	Compliance with noise requirements.		1. ACEN Complaints Register August 23	There have been no official noise complaints	Compliant	
14	Measures and monitoring programs to minimise dust as a result of the development.		1. STSP - Vital Chemical Subcontract, 3/10/2023	There have been several dust related preventative actions recorded and the project team is actively trialling a dust suppressant to further manage dust. Whilst dust was an issue observed on-site, there was no offsite migration and the project team monitored, reported and managed it in various ways.	Compliant	
15	Evidence of protection of heritage items.			The site boundary was moved to avoid heritage impact. Refer to the site inspection for evidence.	Compliant	



16	Evidence of measures/plans/programs being implemented to ensure water being managed on site and no impact off site due to water being diverted and or sediment laden water being diverted off site causing impacts on neighbours properties (condition 26 (c)).		1. SMEC Civil IFC Hydrology Combined, 1/9/2023	The boundary was checked during the site inspection. The ESCP has been implemented and clean water effectively diverted. There was no evidence of offsite impact from sediment laden water.	Compliant
17	Evidence that the Soil and water management plan has been developed in consultation with DPIE Water. Measures and programs to minimise waste management on site.		1. Accent Environmental, Soil and Water Management Plan, Stubbo Solar Stage 2a, 16 May 2023.	In accordance with CoC 27 (Schedule 4) prior to commencing construction the Applicant (ACEN (or PCL/Transgrid)) must prepare a SWMP for the development in consultation with Department of Planning, Industry and Environment (DPIE) (now DPE). This SWMP for Stage 2a of the Stubbo Solar project incorporates comments on the SWMP prepared by Accent for Stage 1 of the project (Blue Springs Road Upgrade and site access construction), as relevant. The SWMP also incorporates advice sought from DPE in relation to the exemption of an SSD project from the need to obtain a Controlled Activity Approval for creek crossing works. DPE has undertaken a review of this SWMP and the comments provided by DPE have been incorporated into this version of the plan. Appendix F lists the consultation undertaken to date, including the review by DPE and the response by the project team. Project engagement requirements are set out in the Community Engagement Plan.	Compliant
18	Management, recording, actioning and implementation of complaints register and for non-compliances and incidents.		1. ACEN Complaints Register August 23 2. HSE-STSP -REG- Register 3.	Registers provided.	Compliant
19	Website for development up to date.		1. <a href="https://stubbosolar.com.au/documents-and-approvals/">https://stubbosolar.com.au/documents-and-approvals/</a>		Compliant
20	Agency Consultation	Local Aboriginal Land Councils	J132_Letter of consultation_LALC.pdf	Sent 29/9/2023, follow up phone call 19/10/2023	Compliant
		BCS Biodiversity Conservation and Science Directorate	J132_Letter of consultation_BSC_2.pdf	Sent 29/9/2023	Compliant
		Mid-Western Regional Council	J132_Letter of consultation_Mid Western Regional Council.pdf	Sent 29/9/2023, follow up phone call 19/10/2023	Compliant
		DPIE Water	J132_Letter of consultation_DPIE-Water.pdf	Sent 29/9/2023	Compliant
		FRNSW Fire and Rescue NSW	J132_Letter of consultation_FireandRescue.pdf	Sent 29/9/2023, follow up phone call 19/10/2023	Compliant
		Heritage NSW	J132_Letter of consultation_Heritage NSW.pdf	Sent 29/9/2023	Compliant
		RFS	J132_Letter of consultation_NSW RFS.pdf	Sent 29/9/2023	Compliant
		TfNSW	J132_Letter of consultation_TfNSW.pdf	Sent 29/9/2023	Compliant

PAR Section and Question number	Requirement	Information	Evidence collected	Independent Audit finding and Recommendations	Compliance Status	NCR ID	Action
Question 1: PAR Section 2	Identify which phase the project is currently proceeding with and outline whether or not the independent audit is currently being completed within the prescribed timeframes outlined in Table 1 below. If written extension to time frames has been received from the department attach correspondence as evidence.	The project is proceeding with the construction timeframe. Commencement of construction was advised by the Contractor as July 10th 2023. The Conditions of consent require the following timeframes under Schedule 4, Condition 11. Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	LD to Behzad Farzipour RE_ New Proposed Timeline for IEA Stubbo Solar Farm.pdf	The audit is being carried out in accordance with the required timeframes.	Compliant		No
Question 2: PAR Section 2	Has the proponents response to previous Independent Audit Report findings been submitted no later than 2 months of the undertaking of the audits site inspection? Has the Independent Audit Report and the proponents response been submitted to the Department via the Major Projects Portal?				Not Triggered		No
Question 3: PAR Section 3.1	Have the lead auditor and any technical specialists who may be supporting the audit team been agreed upon in writing by the Planning Secretary before the commissioning of the audit? Each member of the audit team must receive the Departments agreement and be endorsed by the Planning secretary. ie "This is not a one off approval"	Yes, refer to "Appointment of Experts" - DPE 2023	Appointment of Experts_02052023_082615.pdf	Approval received from DPE.	Compliant		No
Question 4: PAR Section 3.2	Scope Development The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit.		J132_Letter of consultation_DPE.pdf	A letter requesting consultation with DPE was sent to Katrina O'Reilly (DPE)	Compliant		No
Question 5: PAR Section 3.3, 1 A:	Has the audit team assessed all of the conditions of consent applicable to the phase of the development that is being audited?			Conditions of consent audit carried out by Shonelle Gleeson-Willey of Moss Environmental, August 2023 with the site visit planned for 20/21 September 2023.	Compliant		No
Question 6: PAR Section 3.3, 1 B:	Assess all post approval and compliance documents prepared to satisfy the conditions of consent: -Assess the Environmental Management Plans and Sub Plans and evaluate if the plans are effectively implemented for the project?			Refer to the Conditions of Consent Audit.	Compliant		No
Question 7: PAR Section 3.3, 1 C:	What environmental licenses or approvals are in place for this project (Other than EPL's or POEO act approvals)?				Not Triggered		No
Question 8: PAR Section 3.3, 2 A:	Review the environmental performance of the actual impacts compared to the predicted impacts documented in the Environmental Impact Assessment			The on site mitigation measures are implemented as required. There have been two complaints lodged in relation to local roads and construction HV traffic. There is inadequate monitoring data to determine if the EIS predictions were correct.	Compliant		No
Question 9: PAR Section 3.3, 2 B:	Review the environmental performance against the physical extent of the development in comparison to the approved boundary			Refer to the Conditions of Consent Audit.	Compliant		No
Question 10: PAR Section 3.3, 2 C:	Incidents, non-compliances and complaints that occurred or were made during the audit period.		1. Email from Behzad Farzipour 31/10/2023, <i>Draft Post Approval Audit Report</i> .	There has been one recorded NC which was reported just outside the DPE reporting timeframe. Zinfra confirmed in the 'Response to Draft Audit Report' that there have been no environmental incidents on-site to date.	Compliant		No
Question 11: PAR Section 3.3, 2 D:	Review the environmental performance of the development having regard to agency and any particular environmental issues identified through consultation carried out when developing the scope of the audit		1. Letter sent to DPE requesting advice for audit scope. Response received on Monday Sep 18th from Katrina O'Reilly. 2. Further consultation carried out on wed 4th October, with DPE regarding miscommunication between ME, PCL and ACEN. Response from Katrina O'Reilly on 5th October, indicating no need for any further approval.	The environmental performance of the project has been audited taking the consultation with DPE and MWRC into consideration.	Compliant		No
Question 12: PAR Section 3.3, 2 E:	Review the feedback received from the Department and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit			Consultation comments recieved from DPE only.	Compliant		No
Question 13: PAR Section 3.3, 3	Review the environmental performance of the status and implementation of previous audit findings, recommendations and actions (if any)				Not Triggered		No
Question 14: PAR Section 3.3, 4	Complete a high level assessment of whether Environmental Management Plans and Sub Plans are adequate			Refer to CoC audit for detailed assessment	Compliant		No

Question 15: PAR Section 3.3, 5	Review the environmental performance of any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.		Project Objectives;  <ul style="list-style-type: none"> <li>• zero injuries or environmental harm during construction and operation of the works</li> <li>• design for the safety of people, livestock, fauna and flora, and the environment throughout the life of the solar farm in accordance with good industry practices</li> <li>• mutually beneficial relationships with host communities, First Nations and other stakeholders are in place throughout the life of the project</li> <li>• host communities and First Nations are provided with opportunities to actively participate in and benefit from the project through employment, training, social procurement and investment</li> <li>• minimise adverse social and environmental impacts on the local community and environment</li> <li>• allow for future grazing, by sheep, within the Solar Farm (post construction phase)</li> <li>• contribute to Australia's transition to a clean energy future.</li> </ul> <p>The audit has focused on addressing all aspects of the project that DPE and the auditor considered relevant.</p>	Refer to CoC audit for detailed assessment	Compliant		No
Question 16: PAR Section 3.4	Did this audit commence with an opening meeting and is a concluding meeting scheduled? Has a representative of the proponent from managerial level or above attended? Has the register of attendees been completed?				Compliant		No
Question 17: PAR Section 3.5	The Independent Audit must include Site Interviews with key personnel involved in the project delivery.			Interviews were conducted with several of the management team from Zinfra, Transgrid and PCL	Compliant		No
Question 18: PAR Section 3.6	The Independent Audit must include a physical site inspection and must cover all development areas and environmental aspects that form part of the scope of audit.			The audit site inspection was carried out on 20/21st September 2023.	Compliant		No
<b>COC Section and Question number</b>	<b>Question</b>	<b>Information</b>	<b>Evidence collected</b>	<b>Audit finding</b>	<b>Compliance Status</b>	<b>NCR ID</b>	<b>Action</b>
SCHEDULE 2 ADMINISTRATIVE CONDITIONS Schedule 2, Condition 1	Obligation to minimise harm to the environment In meeting the specific environmental performance criteria established under the consent, the applicant must implement all reasonable and feasible measures to prevent and/ or minimize any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.		PCL - documentation 1. Environmental Management Strategy_Stubbo Solar Stage 2a (16th May 2023) 2. Environmental Induction Process within the Construction Environment Management Plan (pg 22). 3. Completed delivery driver inductions. 4. Induction_Dan Schonberg_9 July 2023 5 Development Consent SSD 10452 6. Management Plans developed include, Traffic Management Plan May 2023, Health Safety and Environment Plan March 2023, CEMP 16 May 2023, EMS, AES19 May 2023, BMP, CEP 16 May 2023, Project Execution Plan 10 Mar 2023, SWMP 16 May 2023, WMP, HMP 7. Stubbo Solar, Industry and Aboriginal Participation Plan 8. Stubbo Solar Farm, EIS, Ramboll November 2020.  Transgrid/Zinfra-documentation 9. Environmental Inspection Form template - JAA-HSE-FM-0077 10. Toolbox meeting minutes - 1/8/2023, includes fauna and spill response. 11. Transgrid Stubbo Solar Farm Connection - Project Induction 12. Aspire Register of Environmental Inspections.	Pre-audit assessment 1. The EMS lists training of host communities and first nations to actively participate in and benefit from the project as a project objective. The EMS doesn't provide any additional detail for Training, however does list the Employment and Training Plan. In section 5.5.3 of the EMS it states that each of PCL's BoP subcontractors will have their own HSE management with an obligation to plan, organise and implement training for their workers. The PCL HSE manager will liaise with subcontractor HSE representatives to assist in achieving outcomes. To audit this, PCL must supply subcontractor environmental induction and toolbox evidence. Section 5.6 of the EMS states that a Health, Safety and Environmental Management Plan (HSEMP) will be developed and implemented for works. This has not been provided. Section 5.5 states that the HSE Manager is responsible for planning, organising and implementing safety training of all construction staff. This should be amended to include Environmental and health training aswell. Training plan to be supplied. 2. The CEMP commits to the contractor providing inductions for all PCL and Transgrid staff, contractor employees and subcontractor employees entering the site. The categories listed for inclusion in the induction are generally consistent with the Development Consent_Schedule 2 requirements. Areas not addressed include Accommodation and employment strategy, Decommissioning and rehabilitation. The CEMP requirement for risk management includes Safe Work Method Statements, Pre-activity meetings, Daily pre-start meetings and weekly toolbox meetings. Records of these will be viewed during the on-site audit. 5. The development consent requires training to be delivered on the code of conduct and other relevant obligations under the Traffic Management Plan. 6. Traffic Management Plan - includes the requirement for site induction, toolbox meetings and Safe Work Method Statements. Health, Safety and Environment Management Plan - HSE-03 identifies the minimum HSE training, competency, qualification and licensing requirements for workers on the project. Full time workers are required to attend the training of HSE Induction Video, Life Saving Absolutes Video, PSI Video, Site-Specific Safety Overview Presentation, HSE Induction Checklist, HSE Induction Quiz and Answer sheet. The induction also includes the online Project Induction Program. Construction Environment Management Plan -Section 5.7 details Induction and training requirements. Environmental Management System - discussed above	Compliant		No
Schedule 2, Condition 2	Terms of consent 2. The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent Note: The general layout of the development is shown in Appendix 1	Documents requested during audit;		The project EIS Mitigation Measures and Conditions of Consent have been assessed as part of this audit. The response to this section focuses on the EIS Mitigation Measures. The CoCs are addressed individually under their specific Schedule and number in the remaining sections of this	Non-Compliant	NCR#1	No

		<p>1. EPL - NA</p> <p>2. Clearing protocol. PROTOCOL 1 in BMP</p> <p>3. Pre-clearance surveys for vegetation removal - SIGHTED IN SITE INSPECTION</p> <p>4. Procedure for the relocation of habitat features. - PROTOCOL 1 IN BMP</p> <p>5. Environmental monitoring plan for within the environmental exclusion zone, assessing indirect impacts. PROTOCOL 13 IN BMP. THIS IS ANNUAL MONITORING THEREFORE NOT YET TRIGGERED</p> <p>6. Evidence of dust suppression activities taking place. SIGHTED DURING SITE INSPECTION</p> <p>7. Evidence of progressive revegetation. SIGHTED DURING SITE INSPECTION</p> <p>8. Evidence of speed limits across site in accordance with the TMP. SIGHTED DURING SITE INSPECTION</p> <p>9. Section of the environmental site induction outlining rubbish disposal guidance, prohibition of wood collection, prohibition of lighting fires, no-go zones for native vegetation, speed limits. INDUCTION COMPLETED BY AUDITOR AND SIGHTED THESE.</p> <p>10. Evidence that waterways crossings are designed in accordance with the Policy and Guideline for fish friendly waterway crossing (DPI). NON-CONFORMANCE DURING SITE INSPECTION. FOLLOW UP EVIDENCE OF rectification works provided.</p> <p>11. Aboriginal Cultural Heritage Management Plan. HMP INCLUDES CULTURAL HERITAGE</p> <p>12. Unexpected finds protocol. WITHIN HMP</p> <p>13. Evidence of appropriate fuel and chemical storage. SIGHTED DURING SITE AUDIT. BUNDED STORAGE</p> <p>14. Evidence of measures to mitigate soil contamination by fuels or other chemicals. BUNDED STORAGE CONTAINERS AND SMALLER PODS OBSERVED. VERY TIDY SITE.</p> <p>15. Evidence of machinery maintenance and scheduled inspections. SIGHTED IN PCL MANAGEMENT SYSTEM.</p> <p>16. Evidence of consultation with Mid-Western Council regarding Blue Spring Road . ROAD WORKS APPROVAL GRANTED AND AVAILABLE ON WEBSITE. AUDIT AWAITING COUNCIL COSULTATION during construction and landholders. Inc the topic of continued grazing within the study area throughout operation. NOT YET TRIGGERED.</p> <p>17. Evidence that roadside plantings on the eastern boundary have been retained where possible. NOT RELEVANT TO STAGE 2</p> <p>18. Evidence that the existing vegetation within the environmental exclusion zones will be retained and protected to maintain the existing level of screening. FENCING PROVIDES SUFFICIENT BARRIER TO PREVENT ACCIDENTAL REMOVAL</p> <p>19. Evidence of the pre-construction road maintenance surveys. NOT APPLICABLE TO STAGE 2</p> <p>20. Flood response plan detailing procedures and options for safe access in the event of a flood. EMERGENCY MANAGEMENT PLAN, APPENDIX 2 PROCEDURES COVERS THIS.</p> <p>21. Evidence that the sight distance analysis at Cope Road/ Blue Springs Road intersection, and at the proposed site access points from Blue Springs Road and Barneys Reef Road, has been ground-truthed. TRAFFIC MANAGEMENT PLAN APPENDIX E PROVIDES TFNSW ACCEPTANCE OF THE PLANS. Evidence provided with RF13.</p> <p>22. Evidence of appropriate parking provided on-site. SIGHTED DURING AUDIT.</p> <p>23. design details of solar panels/array, showing ability for 300mm freeboard of the lowest edge above the max 1% AEP flood levels. INCLUDED IN DETAILED DESIGN. REQUIREMENT IN APPENDIX B OF THE PCL CEMP.</p> <p>24. Erosion and Sediment Control Plans (drawings). These are not included in Appendix C of SWMP. VIEWED DURING ON-SITE AUDIT</p> <p>25. Request to view current ESCP and do site inspection. COMPLETED</p> <p>26. Weed cleaning records for vehicle/ wheel wash bay. WEED FREE CERTIFICATES FOR MACHINERY VISUALLY OBSERVED FROM PCL SYSTEM RECORDS.</p> <p>27. On-site evidence of speed limit signage and restricted access routes. VISUALLY OBSERVED WHILST ON-SITE</p> <p>28. Evidence of salvage by surface collection at the Rosevale site IF-01) SITE BOUNDARY MOVED SO THIS IS OUTSIDE THE BOUNDARY OF THE PROJECT AND FENCING</p> <p>29. Evidence of consideration during detailed design of array spacing to allow for weed control and establishment of groundcover. COVERED IN APPENDIX B OF PCL CEMP AND DISCUSSED ON SITE DURING SITE INSPECTION. ALLOWANCE MADE.</p> <p>30. Complaints register NO COMPLAINTS RECIEVED (PCL)</p> <p>31. Weekly Environmental Site Inspection reports. OBSERVED DURING SITE AUDIT IN HARD COPY (JASE) AND ON FIL IN PCL SYSTEM ONLINE.</p> <p>32. Records of ongoing consultation with Mid-western council, Transgrid, Landowners, Aboriginal stakeholders. Specifically regarding minimising disruption to agricultural activities and to investigate the feasibility of grazing within the study arae throughout operation. CONSULTATION WITH MWRC AVAILABLE ON WEBSITE, CONSULTATION WITH TRANSGRID AVAILABLE IN CEMP, CONSULTATION WITH LANDOWNERS CARRIED OUT VERBALLY ON AN ONGOING BASIS AND VERIFIED DURING SITE INSPECTION, CONSULTATION WITH ABORIGINAL STAKEHOLDERS covered in section 3.2 of HMP and Aboriginal Cultural and Historic Heritage Assessment Report: Stubbo Solar Farm (OZARK 2020)</p> <p>33. documentation to show ground-truthing of intersection sight distances at the Cope Road / Blue Springs Rd intersection. APPROVAL OF TMP BY TFNSW.</p> <p>34. Detailed Design AVAILABLE ON WEBSITE</p> <p>35. Approval for Emergency Management Plan (DPE) ON WEBSITE</p> <p>36. Planning Secretary approval for the Accommodation and Employment Strategy ON WEBSITE</p> <p>37. AES Table 11.1 Accommodation Strategies during construction, compliance records (evidence of consultation with MWRC, Lease records, register of workers and accommodation forecasts, staff housing records, workforce contract, STRA ID numbers, Quarterly reports, Monthly accommodation reviews and forecasts, Shuttle bus schedule, Report of workers and subcontractors (% local v non-local), Rental property owner register, recruitment campaign records, funding records for micro-credentialling, work experience records, meetings records (TAFE, Suppliers, Procurement), % Indigenous employment and subcontractors with indigenous ownership, Preferred contractor list.) NOT YET REPORTABLE DUE TO NOT YET REACHING FIRST Q. THESE DETAILS VIEWED IN PCL SYSTEM.</p> <p>38. Evidence of the Planning Agreement and Community Benefit Share Fund contributions. PROVIDED BY PCL</p> <p>39. Evidence of the outcomes of Consultation with local accommodation providers. NOT SUPPLIED</p> <p>40. Evidence of application of the resource management hierarchy principles (avoid, reduce, reuse, recycle, recover, disposal). OBSERVED DURING SITE INSPECTION</p> <p>41. Evidence of water cart usage, covering loads when transporting on public roads, optimising vehicle movements on-site, and ensuring that dust suppression measures take into consideration weather conditions. OBSERVED DURING SITE INSPECTION</p> <p>42. Evidence of consultation with all other RE and non-RE projects within the CWO-REZ for ongoing cumulative impact assessment purposes.</p> <p>Zinfra.</p> <p>1. HSE Risk Register is incorporated into the CEMP.</p>	<p>PCL</p> <p>1. Stubbo Solar Farm, EIS, Ramboll November 2020.</p> <p>Mitigation measures are included in Table 20-1.</p> <p>2. Soil and Water Management Plan, Accent Environmental 16th May 2023</p> <p>3. Erosion and Sediment Control Plan Stage 2a, SWMP Appendix C, Accent Environmental 16th May 2023</p> <p>4. Development Consent SSD 10452</p> <p>5. Waste Management Plan, Stubbo Solar Storage Stage 2a, Accent Environmental 16th May 2023.</p> <p>6. ACEN Complains Register August 2023</p> <p>7. Attachment A - MWRC-Blue Springs Road</p> <p>8. NSW212453-IFC-REV02-C103-001</p> <p>Transgrid / Zinfra</p> <p>6. 330kV Switching Station Construction Environmental Management Plan, 24/8/2023.</p>	<p>audit.</p> <p>EIS mitigation measures</p> <p>1. B10 - The TMP shows the approved B-double routes and restricted vehicle access map with speed limits.</p> <p>B11 - the BMP doesnt cover all the aspects required for coverage in the strategy to protect vegetation. Specifically rubbish disposal guidance, prohibition of wood collection, prohibition of lighting fires, no-go zones for native vegetation outside the development footprint. Speed limits are covered in the TMP.</p> <p>B12 - Progressive rehabilitation is included in section 2.16 of ESCP. However, it only states that rehabilitation will be in accordance with the BMP. The BMP doesnt provide any specifics for species, time of year, growth stage etc. Is there a landscape Management Plan?</p> <p><b>B13 - The ESCP doesn't state that works/plans will be in accordance with the Policy and Guideline for fish friendly waterway crossing (DPI)</b></p> <p>AH1-3 - provided.</p> <p>HH1-3 - No unanticipated finds protocol provided or on website.</p> <p>S1 - Progressive stabilisation is included in the SWMP and ESCP.</p> <p>S2 - All aspects addressed as per requirements of the CoC and post-approval assessment by DPE in Appendix F of SWMP.</p> <p>S3 - Detailed design not yet provided. Spacing between arrays to allow for weed control and establishment of ground cover to be provided in on-site audit. Site inspection confirmed this is adequate.</p> <p>LU1 - Addressed in section 8.2 of the CEMP. Evidence to ensure compliance will be site inspections, site induction and complaints register. Confirmed during site inspection.</p> <p>LU2 - Addressed in BMP - Protocol 5.</p> <p>LU3-5 - Consollation is required with Mid-Western Council and DPE and other relevant stakeholders including mining and exploration licence holders and native title claimants throughout construction, to identify potential impacts . Additional specific stakeholders identified include TransGrid and landowners, as per Table C1 within the CEMP and within the CEP. evidence of consultation with MWRC, DPE, Transgrid and landowners was provided during and post site audit.</p> <p>LCV1-3 - On-site evidence of retention of roadside plants along Eastern boundary and existing vegetation within the environmental exclusion zone required. This was visually assessed during the site inspection and it appears that vegetation has been retained as required, however there was no documentation provided to verify the extent.</p> <p>NV1 - Requirements are addressed in section 8.5 of the CEMP. The audit will assess for any complaints. The ACEN complaints register has been provided as part of the audit RF1. Two complains related to traffic and transport recorded.</p> <p>T1 - Consultaion with Mid-western Council regarding road upgrades has been provided. MWRC has confirmed their acceptance of the upgrades.</p> <p>T2-T4 - The TMP has been prepared. Consultation with Council is included in Appendix E. Council has agreed to the plan. TFNSW was consulted and provided input on 2 May 2023. The TMP has been checked and these requested changes made. Training for driver code of conduct has been provided in the form of Delivery driver orientations. Road upgrades are detailed in Section 3.6. Site audit will view upgrades. The site audit confirmed that upgrades have taken place.</p> <p>T3 - Documentation provided to show ground-truthing of intersection sight distances at the Cope Road / Blue Springs Rd intersection, as part of RF#3.</p> <p>W1 - W6 - Detailed design not provided. 30% design provided.</p> <p><b>W7 - The ESCP doesn't state that works/plans will be in accordance with the Policy and Guideline for fish friendly waterway crossing (DPI). Section 2.9 The ESCP covered some of the requirements within Table 20-1 (W7) with the exception of identifying the placement of controls.</b></p> <p>W8 - SWMP Appendix F Consultation register contains no consultation with landholders. The site audit will need to confirm if dam water is to be used. Site audit confirmed that consultation has taken place and no dam water is currently being used.</p> <p>H1 - H4 - Bushfire Management Plan provided</p> <p>SA11 - AES prepared. Consultation conducted is provided in Table 1.1 and includes Council. No Planning Secretary approval is on the website. The accommodation strategy does not include a construction camp. Section 12 addresses the monitoring requirement. Records as per Table 11.1 are to be provided during audit.</p> <p>SA12 - No records supplied.</p> <p>SA13 - The AES details this. Compliance through the documents requested in item 38.</p> <p>SA14 - Outcomes of the Consultation with local providers is detailed within the AES. Evidence should be sighted. Evidence was provided in the form of emails and a spreadsheet with tracking numbers.</p> <p>SA15 - As above.</p> <p>WR1-WR8 - Management Plan addresses all requirements within the EIS.</p> <p>AQ1 - AQ4 - Management Plan addresses all requirements within the EIS.</p> <p>CU1 - The CEP includes on-going consultation roles and responsibilities within Section 6.2. All requirements are adequately covered with the exception of consultation with other projects. This responsibility is not specifically allocated with either PCL or ACEN. Consultation for cumulative impacts is a major issue and should be undertaken with Council and the other projects. Table 6.1 identifies that other nearby Solar projects will be provided with information to allow for cumulative impact assessment. This should extend to all projects of all types (RE and non-RE) within the REZ and be consultation not just inform.</p> <p>2. The Guidelines for Riparian Corridors in Appendix D of the SWMP is out of date. The new version is 2012.</p> <p>3. <b>The ESCP doesn't state that works/plans will be in accordance with the Policy and Guideline for fish friendly waterway crossing (DPI). Section 2.9 The ESCP covered some of the requirements within Table 20-1 (W7)</b></p> <p>4. This audit confirms if CoC are being followed.</p> <p>6. The Zinfra CEMP addresses the EIS mitigation measures in Section 1. The high level Environmental Risks and Targets are detailed in Section 12.2.1, and in section 12.3 Environmental Aspect and Impact Controls. The Project HSE Risk Register forms the basis of environmental aspect and impact management, this is completed by the project team prior to Construction commencement. Environmental Aspects and Impacts are included in the Zinfra CEMP.</p>		
Schedule 2, Condition 3	3. If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.		<p>1. Health, Safety, and Environmental Policy Statement. PCL Construction No date.</p> <p>Zinfra</p> <p>2.HSEQ Policy, May 2021.</p>	<p>1. The HSE Policy was inadequate because the first line doesn't reflect the intent of a Policy Statement 'PCL Constructors Pacific Rim Pty Ltd is committed to prevention of pollution and biodiversity as we as...'</p> <p>The Policy requires a date and review date. This Policy was revised and the final version provided with the second round of RF1 documentation.</p> <p>2. The Zinfra HSEQ Policy is adequate.</p> <p>There are no identified inconsistencies.</p>	Compliant	No

Schedule 2, Condition 4	The Applicant must comply with any requirement/s of the Secretary arising from the Departments Assessment of: (a) any strategies, plans or correspondence that are submitted in accordance with this consent; (b) any reports, reviews or audits commissioned by the department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents		1. Stubbo Solar Farm - SSD-10452, DPE-Water Post Approval Review, SWMP 2. Biodiversity Management Plan, Appendix 3-5, Letter, from Liz Mazzer (DPE) to Jane Book (OzArk) titled 'Biodiversity Management Plan Requirements - Stubbo Solar Farm, 10 January 2023. 3. Biodiversity Management Plan, Appendix 3-5, Letter, from Liz Mazzer (DPE) to Jane Book (OzArk) titled 'Biodiversity Management Plan Review - Stubbo Solar Farm, 17th February 2023. 4. Biodiversity Management Plan, Appendix 3-5, Letter from Liz Mazzer DPE to Jane Book, titled 'Biodiversity Management Plan Review - Stubbo Solar Farm', dated 11 May 2023. 5. Accommodation and Employment Strategy, Appendix F, Letter from Brad Cam (MWRC) to Michael Yeo (ACEN) titled 'Subject: Stubbo Solar Farm (SSD-10452) Accommodation and Employment Strategy'. 6. Traffic Management Plan, Appendix E 'Consultation with Mid-Western Council' 7. Traffic Management Plan, Appendix F 'Consultation with Transport for NSW' 8., Traffic Management Plan, Appendix G 'Consultation with Mines / Wollar Solar Farm'	1. All review action items have been closed out. 3. The Review letter contains a table of BCS's recommendations and OzArk Responses for the development of the Biodiversity Management Plan. The Letter provided as evidence 4 provides close out of review actions/comments by the Biodiversity, Conservation and Science Directorate. 5. The letter from MWRC to ACEN on 9 May 2023 does not support the Accommodation and Employment Strategy, requesting various changes. ACEN supplied a response back to MWRC by way of a comments table. All comments have been addressed, however a letter of support from MWRC, has not been included. Audit to request correspondence from MWRC with support for the AES. 6. Council has advised that the TMP meets their requirements. 7. TINSW has provided an update to Appendix 1, with agreement of the section where each comment has been addressed. 8. The TMP doesnt include any document in Appendix G, no Consultation with mines or Wollar Solar Farm provided. This is to be sighted in the audit. 9. Zinfra. - Operating under the same Management Plans as PCL, and the CEMP doesnt need approval.  Evidence to request during the audit: 1. Correspondence from MWRC with support for the AES. Not provided verify. 2. Consultation with mines and Wollar Solar Farm. Not provided. 3. Any other correspondence from Government departments not included in Management Plans. PROVIDED WITHIN MANAGEMENT PLANS ONLY	Compliant		No
Schedule 2, Condition 5	Upgrading of Solar Panels and Ancillary Infrastructure 5. The Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.				Not Triggered		No
Schedule 2, Condition 6	STRUCTURAL ADEQUACY 6. The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia. Notes: • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.		A construction certificate is required.  Additional Documentation to request 1. ACEN to provide the construction certificate. Supplied email from Build Cert stating there is no requirement for earthwork. Re: Stubbo certification- TransGrid switch yard, 10/10/2023.	Evidence provided confirming there is no requirement for earthworks certification.	Compliant		No
Schedule 2, Condition 7	DEMOLITION 7. The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version				Not Triggered		No
Schedule 2, Condition 8	PROTECTION OF PUBLIC INFRASTRUCTURE 8. Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent				Not Triggered		No
Schedule 2, Condition 9	OPERATION OF PLANT AND EQUIPMENT 9. The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner		During Audit: Review evidence of equipment maintenance schedules, Operating manuals and maintenance/repair records.  1.Zinfra - G-CN-FM-12147 Project Tools, Plant and Equipment Register, 2. Stubbo Switching Station Mobile Plant Register	1. The Zinfra register was not completed. No records provided. RFI#3 An updated register was provided as part of the response to draft audit report.	Compliant		No
Schedule 2, Condition 10	SUBDIVISION 10. The Applicant may subdivide land comprising the site for the purposes of carrying out the development, to create separate freehold titles in accordance with one of the two options identified in Appendix 4, the EIS and the requirements of the EP&A Act, EP&A Regulation, Conveyancing Act 1919 (NSW) and the NSW Land Registration Services (or its successor). Notes: • Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision. • Division 6.4 of Part 6 of the EP&A Act sets out the application requirements for subdivision certificates.		During Audit: Review evidence of equipment maintenance schedules, Operating manuals and maintenance/repair records.  1.Zinfra - G-CN-FM-12147 Project Tools, Plant and Equipment Register	Request subdivision certificate during audit. RFI#3 Documentation provided for RFI 3	Compliant		No
Schedule 2, Condition 11	COMMUNITY ENHANCEMENT 11. Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with: (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the letter of offer dated 27 May 2021, summarised in Appendix 3.		During Audit: Review evidence of equipment maintenance schedules, Operating manuals and maintenance/repair records.  1.Zinfra - G-CN-FM-12147 Project Tools, Plant and Equipment Register	VPA is in place.	Compliant		No
SCHEDULE 3 ENVIRONMENTAL CONDITIONS - GENERAL Schedule 3, Condition 1	BATTERIES Battery Storage Restriction 1. The battery storage facility or system associated with the development must not exceed a total delivery capacity of 200 MW. Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage facility or system in the future.			The battery storage facility is a later stage. Confirmed during site audit.	Not Triggered		No

Schedule 3, Condition 2 & 3	TRANSPORT Over-Dimensional and Heavy Vehicle Restrictions 2. The Applicant must ensure that the: (a) development does not generate more than: • 60 heavy vehicle movements a day during construction, upgrading and decommissioning; • 20 over-dimensional vehicle movements during construction, upgrading and decommissioning; and • 5 heavy vehicle movements a day during operations; on the public road network; and (b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 metres, unless the Planning Secretary agrees otherwise. 3. The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day for the duration of the project.		1.Amber Traffic & Transportation Direction, Stubbo Solar - Stage 2a, Blue Spring Road, Stubbo, Traffic Management Plan, May 2023.  Condition 2 of Schedule 3 of the Development Consent requires the development to not generate more than 60 heavy vehicle movements a day during construction. A vehicle movement is defined as one vehicle entering and leaving the site. As such, the proposed traffic volumes during construction comply with the requirements of the condition. Of the 60 heavy vehicle movements a day, Transgrid will generate the following during their construction works: Months 0-4 – up to 25/day Months 4-7 – up to 20/day Months 7 to completion – up to 10/day PCL will generate the balance of allowable heavy vehicle movements over the period of Transgrid's construction works, and will then generate up to 60 heavy vehicle movements a day for the remainder of the construction period. Condition 2 of Schedule 3 of the Development Consent also requires the development to not generate more than 20 over-dimensional vehicle movements. Transgrid expect to require up to eight OSOM vehicle movements to site during their construction works. PCL will use the balance of allowable OSOM movements to site (up to 12) during their construction works.  Zinfra. 1. 330kV Switching Station, Construction Environmental Management Plan, P810053-EN-PL-001, 24/08/2023. Section 19.7 and Appendix 12	Request, vehicle movement log during audit.  On the day of the site inspection, an NC was identified by the project team as part of normal processes, where HV movements had been exceeded over three days.	Non-Compliant	NCR#2	No
Schedule 3, Condition 4	Access Route 4. All over-dimensional and heavy vehicles associated with the development must travel to and from the site via Golden Highway, Ulan Road, Cope Road and Blue Springs Road as identified in Appendix 1 and Appendix 5. Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.		Section 3.5.3 of the TMP outlines the Heavy Vehicle access route, which is consistent with the requirements of this condition.  TMP signed acknowledgment-sample  Stubbo Solar Project Safety Overview Rev 5	During audit request heavy vehicle log books, or other evidence to show these routes are being used. RFI#3 Provided for RFI 3.	Compliant		No
Schedule 3, Condition 5,6,7	Site Access 5. All vehicles associated with the development must enter and exit the site via the preferred site access point off Blue Springs Road, as identified in Appendix 1 and Appendix 5. 6. If the applicant cannot secure access via the preferred site access point detailed in condition 5 of Schedule 3 of this consent, all vehicles associated with the development must enter and exit the site via the alternative site access point off Blue Springs Road, as identified in Appendix 1 and Appendix 5. 7. The site access point off Barneys Reef Road may only be used for emergency purposes.		1. Delivery Driver Orientation 2. TMP signed acknowledgement - sample 3. Stubbo Solar Project Safety Overview Rev 4  Zinfra. 2. 330kV Switching Station, Construction Environmental Management Plan, P810053-EN-PL-001, 24/08/2023. Section 19.7 and Appendix 12  3. TMP signed acknowledgment sample  4. Stubbo Solar Project Safety Overview Rev 5	1. the Delivery Driver Orientation form doesnt include details about the approved access.  Request documentation to show communication of this information and Assess visually during audit by looking at signage from the highway and access points. RFI#3 documentation provided confirming that approved access routes are communicated to delivery drivers.  2. The Zinfra VMP provides a map showing the approved access route.	Compliant		No
Schedule 3, Condition 8	Road Upgrades 8. Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must upgrade: (a) the selected access point off Blue Springs Road, as identified in Appendix 1 and Appendix 5, in accordance with Council requirements; (b) Blue Springs Road from the Cope Road up to a minimum 100 m beyond the selected site access point, as identified in Appendix 5; and (c) the intersection of Cope Road and Blue Springs Road with BAR and BAL treatments to be sealed, designed and constructed for 100 km/h speed environment, able to accommodate the largest vehicle using the intersection, match existing road levels and not interfere with existing road drainage, identified in Appendix 5. Unless the relevant roads authority agrees otherwise, these upgrades must comply with the Austroads Guide to Road Design (as amended by TNSW supplements), and be carried out to the satisfaction of the relevant roads authority.		Road upgrades were carried out as part of stage 1 1. MidWestern Regional Council consultation letter. 2. NSW212453_R01.01_Dilapidation Report_200123 3. ACEN Blue Springs Road Letter 10 May 2023 from Julian Geddes 4. Subject: Stubbo Solar Farm-Request for Staged Development (SSD-10452)	MWRC have supplied a letter confirming they accept the road upgrades.  Evidence 3 - Letter wording. Please be advised Council confirms that the upgrade to Blue Springs Road has been completed to the satisfaction of Council as the Roads Authority and as per the approved design.	Compliant		No
Schedule 3, Condition 9	Road Maintenance 9. The Applicant must: (a) undertake an independent dilapidation survey to assess the: • existing condition of Ulan Road, Cope Road and Blue Springs Road on the transport route, prior to construction, upgrading or decommissioning works; and • condition of Ulan Road, Cope Road and Blue Springs Road on the transport route, following construction, upgrading or decommissioning works; (b) repair Ulan Road, Cope Road and Blue Springs Road on the transport route if dilapidation surveys identify that the road has been damaged during construction, upgrading or decommissioning works; in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary. If there is a dispute about the repair of Ulan Road, Cope Road and Blue Springs Road between the applicant and the relevant roads authority, then either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's decision on the matter must be final and binding on both parties.		During Audit, Request Dilapidation Survey 1. 19.14369- Jul23, Dilapidation Report-Stubbo Solar Farm  2. NSW212453-R01.01-Dilapidation Report-200123	The road improvements were completed as Stage 1 of the project.	Compliant		No
Schedule 3, Condition 10	Operating Conditions 10. The Applicant must ensure: (a) the internal roads are constructed as all-weatherroads; (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) vehicles leaving the site are in a clean condition, with loads appropriately covered or contained, to minimise dirt being tracked onto the sealed public road network.				Not Triggered		No

Schedule 3, Condition 11	<p>Traffic management Plan 11. Prior to commencing road upgrades, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council and to the satisfaction of the Planning Secretary. This plan must include: (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition 8 of Schedule 3 of this consent; (c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: • details of the dilapidation surveys required by condition 7 of Schedule 3 of this consent; • temporary traffic controls, including detours and signage); • notifying the local community about development-related traffic impacts; • procedures for receiving and addressing complaints from the community about development related traffic; • minimising potential cumulative traffic impacts with other projects in the area, including during construction, upgrading or decommissioning works; • minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network (measures also required during operation of the project); • minimising dirt tracked onto the public road network from development-related traffic; • details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; • encouraging car-pooling or ride sharing by employees; • scheduling of haulage vehicle movements to minimise convoy length platoons; • responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; • monthly monitoring for, and responding to, any emergency repair and/or maintenance requirements; and • a traffic management system for managing LAND MANAGEMENT 12. The Applicant must maintain the agricultural land capability of the site, including: (a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading; (b) properly maintaining the ground cover with appropriate perennial species and weed management; and (c) maintaining grazing within the development footprint, where practicable, unless the Planning Secretary agrees otherwise.</p>		<p>1. Amber Traffic &amp; Transportation Direction, Stubbo Solar - Stage 2a, Blue Spring Road, Stubbo, Traffic Management Plan, May 2023.  2. Correspondence from TfNSW and Council regarding reviews and acceptance of TMP. Details included in audit questions above.  3. 330kV Switching Station, Construction Environmental Management Plan, P810053-EN-PL-001, 24/08/2023. Section 19.7 and Appendix 12 Vehicle Management Plan.</p>	<p>A Traffic Management plan has been prepared and approved by DPE. The TMP covers all the required aspects.</p>	Compliant	No
Schedule 3, Condition 12	<p>BIODIVERSITY Vegetation Clearance 13. The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.</p>			<p>During audit, visually assessed. Not specifically triggered till operational.</p>	Compliant	No
Schedule 3, Condition 13	<p>Biodiversity Offsets 14. In accordance with the timing in Table 1, the Applicant must retire biodiversity credits of a number and class specified in Table 2 and Table 3 below, unless the Planning Secretary agrees otherwise. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by: (a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.</p>			<p>Visually assessed during the site inspection. Robust fencing prevents access to these areas.</p>	Compliant	No
Schedule 3, Condition 14	<p>Biodiversity Management Plan 15. Prior to commencing road upgrades, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must: (a) include a description of the measures and timeframes that would be implemented for: • protecting vegetation and fauna habitat outside the approved disturbance areas; • managing the remnant vegetation and fauna habitat onsite; • minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; • minimising the impacts to fauna on site and implementing fauna management protocols; • avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; • rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area; • maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and • controlling weeds, feral pests and pathogens; (b) include a program to monitor and report on the effectiveness of mitigation measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan. Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan. Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.</p>			<p>During audit, request biodiversity credit purchase receipt/confirmation. Information provided as part of RFI</p>	Compliant	No
Schedule 3, Condition 15	<p>AMENITY Construction, Upgrading and Decommissioning Hours 16. Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between: (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and (c) at no time on Sundays and NSW public holidays. The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary: • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or • emergency work to avoid the loss of life, property and/or material harm to the environment.</p>		<p>1. OzArk Environment &amp; Heritage, Biodiversity Management Plan: Stubbo Solar Farm Stage 2, Blue Springs Road Stubbo, May 2023.  2. Appendix 3 Response from BCS comments  3. Appendix 4 BCD Letter re Revised BD Offsetting requirements  4. Appendix 5, BCD Letter of Approval</p>	<p>A Biodiversity Management plan has been prepared and approved by DPE. The BMP covers all the required aspects.</p>	Compliant	No
Schedule 3, Condition 16	<p>Noise 17. The Applicant must: (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and (b) ensure that the noise generated by the operation of the development during the night does not exceed 35 dB(A) LAeq,15min to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.</p>			<p>During audit, review complaints register for PCL. RFI#3 ACEN provided the complaints Register for the entire project. All complaints have been recorded.</p>	Compliant	No
Schedule 3, Condition 17	<p>Noise 17. The Applicant must: (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and (b) ensure that the noise generated by the operation of the development during the night does not exceed 35 dB(A) LAeq,15min to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.</p>		<p>During audit, request noise monitoring records. review complaints register.  PCL  1. EIS Appendix G Noise and Vibration Assessment Report Zinfra  1. JAA-QM-TP-0009 IMTE Register (no entries)</p>	<p>There's no noise monitoring being done. There have been no official noise complaints. The noise modelling predicted exceedance at R2 (receiver) only during out of hours work, if day time activity level is carried out. There's no out of hours work planned or being carried out.</p>	Compliant	No

Schedule 3, Condition 18	Dust 18. The Applicant must minimise the dust generated by the development		During audit, request to see water cart in action, and log book. Look at the complaints register and incident register.	Several water carts in action were observed on both the supplier and PCL project sites during the site audit. There is documented evidence that PCL are in discussions with a polymer supplier.	Compliant	No
Schedule 3, Condition 19	Visual 19. The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.			The on-site audit inspection found that the site entrance is simple and displays minimal signage. The project site cannot be seen from the main access road. The neighbouring properties have a view over the project. There's no glare or offensive visual impacts.	Compliant	No
Schedule 3, Condition 20	Lighting 20. The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: NSW Government Planning, Industry and Environment 11 • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, and the Dark Sky Planning Guidelines (DPE 2018) or its latest versions.		visually assesses at night time during audit. This aspect is not addressed in the Zinfra CEMP.	Night-time lighting is restricted to security lighting. This lighting cannot be observed from the public road.	Compliant	No
Schedule 3, Condition 21,22	HERITAGE Protection of Heritage Items 21. The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint. 22. Prior to carrying out any development that could directly or indirectly impact the heritage item identified in Table 2 of Appendix 6, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version. Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 6		1. OzArk, Draft Heritage Management Plan, Stubbo Solar Project - Stage 2, 2023. 2. Zinfra 330kV Switching Station CEMP, 24/08/2023, Section 19.8	All 25 identified Aboriginal sites within the HMP will be protected during construction and operation. All 25 recorded Aboriginal sites will be located within the environmental exclusion zone which includes buffers around the recorded site extents. During audit, visually assess the exclusion zone fencing and location. This was assessed during the site audit, is compliant.	Compliant	No
Schedule 3, Condition 23	Heritage Management Plan 23. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; (c) include a description of the measures that would be implemented for: • protecting the Aboriginal heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6; • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 6; • a contingency plan and reporting procedure if: - previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; • ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and • ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.		1. OzArk, Heritage Management Plan, Stubbo Solar Project - Stage 2, 2023. 2. HMP Approval letter, DPE, 21/6/2023	The Heritage Management adequately addresses all requirements and has been approved by DPE.	Compliant	No
Schedule 3, Condition 24	SOIL AND WATER Water Supply 24. The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development		1. Ramboll, Environmental Impact Statement, Stubbo Solar Farm Stage 2 2. Construction Environmental Management Plan, section 6.8 Water Supply. 3. Zinfra 330kV Switchyard CEMP, Appendix 11. 4. Water use evidence docket, PCL	section 2.7.1 of the EIS outlines that water will be sourced from suppliers in the region, brought to site with water trucks, opportunistically sourced from farm dams located within the 3 study area, from treated wastewater if available in the nearby region; or would be sourced using town water if available and appropriate at the time of construction. The CEMP, section 6.8 Water Supply reiterates the requirements of the CoC and information within the EIS. No specifics around where water will be sourced are provided. The Zinfra CEMP adheres to the approved 'Stubbo Solar Soil and Water Management Plan V8', regarding water supply. During the audit request correspondence evidence regarding using farm dam water under Harvestable Rights and with Council regarding using treated wastewater. This hasn't been triggered as yet. Dams are currently full and not in use. Detailed design includes those dams which have been or will be removed. Consultation was carried out with the land holder.	Compliant	No
Schedule 3, Condition 25	Water Pollution 25. The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.		PCL - During audit request ESCP. 1. Zinfra, Stubbo Solar Farm Project, 330kV Switching Station Earthworks, Erosion and Sediment Control Plan, 22/08/2023, RevB 2. Zinfra, Erosion and Sediment Control Plan, 9/8/2023.	Consultants credentials as a CPESC have been verified. Creek crossings need rework to be fish passage compliant.	Compliant	No
Schedule 3, Condition 26	Operating Conditions 26. The Applicant must: (a) minimise erosion and control sediment generation; (b) ensure any solar panels and ancillary infrastructure and any other land disturbance associated with the construction, upgrading or decommissioning of the development have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version; (c) ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater NSW Government Planning, Industry and Environment 12 at the site; (d) ensure all works are undertaken in accordance with the following, unless DPIE Water agrees otherwise: • Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), or its latest version; and • Policy and Guidelines for Fish Habitat Conservation and Management (2013), or its latest version.		1. Zinfra, Stubbo Solar Farm Project, 330kV Switching Station Earthworks, Erosion and Sediment Control Plan, 22/08/2023, RevB 2. Zinfra, Erosion and Sediment Control Plan, 9/8/2023. 3. PCL SMEC Civil, IFC Hydrology Combined, 1/9/2023	Erosion and sediment control plans were up to date and available on-site. The site inspection confirmed the presence of controls in accordance with the plans provided.	Compliant	No



Schedule 3, Condition 27	Soil and Water Management Plan 27. Prior to commencing construction, the Applicant must prepare a Soil and Water Management Plan for the development in consultation with DPIE Water. This plan must: (a) demonstrate how the project will meet conditions 25 and 26(a) to (d); and (b) include details of the soil erosion control measures including sediment basins. The Applicant must implement the Soil and Water Management Plan for construction upgrading, operation and/or decommissioning of the development.		1. Accent Environmental, Soil and Water Management Plan, Stubbo Solar Stage 2a, 16 May 2023. 2. Soil and Water Management Plan - Stage 2 approval letter, 6/6/2023, SSD-10452-PA-15 In accordance with CoC 27 (Schedule 4) prior to commencing construction the Applicant (ACEN (or PCL/Transgrid)) must prepare a SWMP for the development in consultation with Department of Planning, Industry and Environment (DPIE) (now DPE). This SWMP for Stage 2a of the Stubbo Solar project incorporates comments on the SWMP prepared by Accent for Stage 1 of the project (Blue Springs Road Upgrade and site access construction), as relevant. The SWMP also incorporates advice sought from DPE in relation to the exemption of an SSD project from the need to obtain a Controlled Activity Approval for creek crossing works. DPE has undertaken a review of this SWMP and the comments provided by DPE have been incorporated into this version of the plan. Appendix F lists the consultation undertaken to date, including the review by DPE and the response by the project team. Project engagement requirements are set out in the Community Engagement Plan.	The SWMP was reviewed and approved by DPE. Erosion and sediment control plans were up to date and available on-site. The site inspection confirmed the presence of controls in accordance with the plans provided.	Compliant	No
Schedule 3, Condition 28	HAZARDS Fire Safety Study 28. Prior to commencing construction of the battery storage facility, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary. The study must: (a) be consistent with the: • Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; • NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; • relevant Australian Standards and International Guidelines; and (b) describe the final design of the battery storage facility. Following completion of the Study, the Applicant must implement the measures described in the Fire Safety Study.		1. Cool Burn Fire & Ecology_ J170 Stubbo Solar Farm, Bushfire Emergency Management and Operation Plan_v1.4a_22 May 2023 2. Mendham Consultants, Stubbo Solar Project_Emergency Plan Rev 4_17/05/2023 3. Zinfra, Emergency Response Plan Stubbo Solar Farm Connection, ABJ-XTC-810053, 21/4/2023	The Fire management plan does not constitute a Fire Study and provides no evidence that it has been prepared in consultation with or to the satisfaction of FFNSW or DPE.  The Project EIS doesn't include a Fire Study, only a section on bushfire risk (15.2.3) which references an RPS Assessment, that is not included in the EIS. The Mitigation Measures section includes the requirement to prepare a Bushfire Management Plan (H1) prior to construction. This plan is referenced as evidence #1.  The Zinfra Emergency Response Plan includes 'Fire' as a possible emergency. The Emergency response procedure in Appendix M only deals with structure fire. The CEMP, Section 19.3 includes bushfire risk and mitigations measure that include Transgrid risk assessment control measures and hot works permit forms. Later sections of this table include emergency procedures for the event of a bushfire and refer to the Emergency Procedure to be followed in case of a fire event. However as stated previously this Procedure doesnt include bushfires.  Recommendation - update Emergency Procedure to include bushfire. Subsequent to the pre audit, the Bushfire Management Plan was supplied.	Compliant	No
Schedule 3, Condition 29	Storage and Handling of Dangerous Goods 29. The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.		During audit, view chemical storage.	Zinfra and PCL and subcontractor- chemical storage on-site visually assessed, adequate.	Compliant	No
Schedule 3, Condition 30	Operating Conditions 30. The Applicant must: (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development: • includes at least a 20 metres defendable space around the perimeter of the solar array area that permits unobstructed vehicle access; • manages the defendable space and solar array areas as an Asset Protection Zone; • complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset ProtectionZones; • is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road; (c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.		1. Cool Burn Fire & Ecology_ J170 Stubbo Solar Farm, Bushfire Emergency Management and Operation Plan_v1.4a_22 May 2023  Zinfra 2. Emergency Response Plan, Stubbo Solar Farm Connection, P810053-HS-PL-002, RevB, 21/4/2023.	During audit view asset protection zones and fire fighting equipment. During the site inspection, the fire water tank and suitable connection for a RFS pumper was observed.  The Zinfra ERP doesn't mention grass/bush fire as an emergency and focuses on management for a structure fire. NOTE: There are also several link breaks throughout the report 'error ref not found'. Zinfandel operates under the ACEN bushfire MP.	Compliant	No
Schedule 3, Condition 31	Emergency Plan 31. Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development and provide a copy of the plan to the local Fire Control Centre. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry point at all times. The plan must: (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent); (b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; (c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site; NSW Government Planning, Industry and Environment 13 (d) list works that should not be carried out during a total fireban (e) include availability of fire suppression equipment, access andwater; (f) include procedures for the storage and maintenance of any flammablematerials; (g) notification of the local RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation proposed to be carried out during a bushfire danger period to ensure whether conditions are appropriate (h) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of anemergency; (i) include a figure showing site infrastructure, Asset Protection Zone and the on-site water supply tank; (j) include location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations; (k) include details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone; (l) include bushfire emergency management planning; and (m) WASTE 32. The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); (c) store and handle all waste on site in accordance with itsclassification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.		1. Cool Burn Fire & Ecology_ J170 Stubbo Solar Farm, Bushfire Emergency Management and Operation Plan_v1.4a_22 May 2023 2. Mendham Consultants, Stubbo Solar Project_Emergency Plan Rev 4_17/05/2023  Zinfra 3. Emergency Response Plan, Stubbo Solar Farm Connection, P810053-HS-PL-002, RevB, 21/4/2023. 4. Stubbo Solar Farm Switching Station CEMP, P810053-EN-PL-001 Rev 2.2, 24/08/2023. (document body is showing Rev 1.4	1. The BMP is missing Appendix 1 showing the Bushfire Emergency Management Plan Map. The Bushfire Emergency Management Plan on page 6 doesnt include calling the RFS in the Actions section. There is no information regarding how the battery storage facility and sub-system can be safely isolated during an emergency.  2. Based on the document history, this document has not been shared with the local fire control center - evidence needed. This auditor believe that the provided document is not consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent), due to there being no reference to planning for Bushfire management. The ERP doesnt include a list of activities which are not allowed during a total fire ban, because no hot works are allowed during TFB according to Table 19.3. The CEMP indicates that a Project Risk Register may provide additional detail, however none was provided during the audit. The Zinfra emergency evacuation Plan includes the location of water, but doesnt include information regarding the connection type and suitability for connection to an RFS water pumper. Section 19.2 of the CEMP contains information regarding the storage and management of flammables. Table 19.3 contains information regarding hot works and total fire bans. Asset protection zone. - Zinfra adheres to the 'Stubbo Solar Project Bushfire Management Plan V1.2'  Recommendation: Review documents to ensure document revision numbers and hyperlinks are correct and functioning. Errors encountered in EMP (doc rev and hyperlinks, CEMP App8 referenced doc number old.	Compliant	No
Schedule 3, Condition 32	WASTE 32. The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); (c) store and handle all waste on site in accordance with itsclassification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.		1. Accent Environmental, Waste Management Plan, Stubbo Solar Stage 2a, 16 May 2023.	Waste management plan is appropriate. during audit assess waste management on-site. The site was assessed during the site audit and found to be very tidy with adequate waste segregation. Zinfra operates in accordance with this WMP.	Compliant	No

Schedule 3, Condition 33	ACCOMMODATION AND EMPLOYMENT STRATEGY 33. Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Planning Secretary. This strategy must: (a) propose measures to ensure there is sufficient accommodation for the workforce associated with the development; (b) consider the cumulative impacts associated with other State significant development projects in the area and tourism activity; (c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and (d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.		1. Accent Environmental, Accommodation and Employment Strategy, Stubbo Solar Stage 2a, 19 May 2023. 2. Letter, DPE to David McKay of ACEN, subject: Accommodation and Employment Strategy Stage 2a for Stubborn Solar Project (SSD-10452), dated 07/07/2023.	1. The management plan does not include any evidence that it has been reviewed and accepted by DPE. Approval now on project website. Appendix F includes consultation and responses to Mid-Western Regional Council during the development of this management plan. This MP considers cumulative impacts through mitigation measures alone in Section 11.1, since section 11.3 does not address any specifics. Table 11.1 provides the compliance record suitable to assess the effectiveness and compliance with this management plan. This evidence has been included in previous sections to be requested from PCL.	Compliant		No
Schedule 3, Condition 34	DECOMMISSIONING AND REHABILITATION 34. Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 4.				Not Triggered		No
Schedule 4 ENVIRONMENTAL MANAGEMENT AND REPORTING	ENVIRONMENTAL MANAGEMENT Environmental Management Strategy 1. Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and (e) include: • references to any plans approved under the conditions of this consent; and • a clear plan depicting all the monitoring to be carried out in relation to the development. Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.			1.(a) - Section 1.4 1.(b) - Section 2 provides Statutory requirements, but doesn't include any approvals required. 1. (c) - Section 4 1. (d) - Section 6.3 1(e) - Table 9.1  Planning Secretary Approval available on website.  The EMS is compliant with all requirements	Compliant		No
Schedule 4, Condition 2	Revision of Strategies, Plans and Programs 2. The Applicant must: (a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and (b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: • submission of an incident report under condition 7 of Schedule 4; • submission of an audit report under condition 9 of Schedule 4; or • any modification to the conditions of this consent				Not Triggered		No
Schedule 4, Condition 3	Updating and Staging of Strategies, Plans or Programs 3. With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. Notes: • While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.		1. Accommodation and Employment Strategy Approval Letter, 7/7/2023 2. Biodiversity Management Plan- Stage 2 Approval Letter, 8/7/2023 3. CEMP Stage 2- Approval letter, 13/7/2023 4. Emergency Management Strategy Approval letter, 27/06/2023 5. Heritage Management Plan Approval letter, 21/06/2023 6. Soil and Water Management Plan Approval Letter, 6/6/2023 7. Traffic Management Plan Stage 2a Approval Letter, 7/7/2023	As assessed prior in this audit, not all management plans have evidence of planning secretary approval. Assessed, all that require approval have approval, which is provided on the project website.	Compliant		No
Schedule 4, Condition 4	NOTIFICATIONS Notification of Department 4. Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.		During the audit - request evidence of notification of the commencement of construction to DPE. Notification now on project website.	Notification available on website.	Compliant		No
Schedule 4, Condition 5	Final Layout Plans 5. Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, showing comparison to the approved layout and including details on the siting of solar panels and ancillary infrastructure, via the Major Projects website.		Detailed design not provided, only 30%. Zinfra provided no Plans.  Final layout plan-DWG-100-104 (on website)	Final layout plans are available on the website.	Compliant		No
Schedule 4, Condition 6	Work as Executed Plans 6. Prior to commencing operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development showing comparison to the approved final layout plans to the Department via the Major Projects website.				Not Triggered		No
Schedule 4, Condition 7	Incident Notification 7. The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.			Incident Register supplied, and notification evidence sighted during site audit. No reportable environmental incidents within the time period of this audit.	Compliant		No

Schedule 4, Condition 8,9,10	Non-Compliance Notification 8. The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance. 9. A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. 10. A non-compliance which has been notified as an incident does not need to also be notified as a non compliance.	The Non-conformance identified on 20/9/2023, being several days where the maximum number of heavy vehicle movements to/from site was exceeded, was verbally reported to DPE on 27/9/2023 with information including the heavy vehicle movements and the proposed reporting process. Whilst the potential truck movement exceedance non-compliances were identified at the time of the audit on 20/9/2023, it was not until 22/9/2023 and following the initial verification processes, that the project team was satisfied that non-compliances had occurred. ACEN submitted its non-compliance report to DPE on 29/9/2023, within 7 days of becoming aware of the NC on 22/9/2023, and following additional verification activities and review of corrective actions implemented by PCL and Zinfra to address the non-compliances. It should also be noted that the potential truck movement exceedances initially identified at the time of the audit on 20/9/2023 were subsequently decreased upon verification of vehicle registration details and associated vehicle classifications due to the erroneous inclusion of some light vehicles in the heavy vehicle movement records.	Email: 31/10/2023 from Behzad Farzipour. Re: Draft Post Approval Audit Report.	When preparing the draft audit report this condition was initially given a non-compliance due to the number of days that elapsed between the initial identification of a possible non-compliance and the written report. Upon receiving the projects response to the audit report, this has been amended to compliant. This change is based on the verbal notification to DPE within the required timeframe.	Compliant	No
Schedule 4, Condition 11	11. Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.			This audit has been conducted within the required timeframe.	Compliant	No
Schedule 4, Section 12,13,14,15,16	12. Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit. 13. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 11 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced. 14. In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition 11 of Schedule 4 of this consent, or condition 13 of Schedule 4 where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. 15. Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary. 16. Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.		Appointment of Experts_02052023_082615.pdf	12. Auditor approved by DPE. 13. N/A 14-16. N/A  Compliant with all requirements.	Compliant	No
Schedule 4, Condition 17	ACCESS TO INFORMATION 17. The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: • the EIS; • the final layout plans for the development; • current statutory approvals for the development; NSW Government Planning, Industry and Environment 16 • approved strategies, plans or programs required under the conditions of this consent; • the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • how complaints about the development can be made; • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Planning Secretary; and (b) keep this information up to date.			All required documentation is available on the website. <a href="https://stubbosolar.com.au/">https://stubbosolar.com.au/</a>	Compliant	No
Appendix 7, Condition 1,2,3,4	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS 1. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 7 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred. 2. Written notification of an incident must: (a) identify the development and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the applicant became aware of the incident; (e) identify any actual or potential non-compliance with conditions of consent; (f) describe what immediate steps were taken in relation to the incident; (g) identify further action(s) that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident. 3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested. 4. The Incident Report must include: (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident.			Incident Register supplied, and notification evidence sighted during site audit. No reportable environmental incidents within the time period of this audit. All other incidents are reported through the ASPIRE system where this data is captured and forwarded to DPE.	Compliant	No



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ENVIRONMENTAL

## 7.2 APPENDIX B -PLANNING SECRETARY AUDIT TEAM AGREEMENT

Mr Michael Yeo  
Suite 2, Level 2  
15 Castray Esplanade  
Battery Point Tasmania 7005  
02/05/2023

Dear Mr Yeo

**Stubbo Solar Farm - (SSD-10452)**  
**Independent Environmental Audit – auditor approval request May 2023**

I refer to your request (SSD-10452-PA-19) submitted on 2 May 2023, for the Secretary's approval of suitably qualified person to undertake the Independent Environmental Audit (IEA) and prepare the IEA report for Stubbo Solar Farm in accordance with conditions of SSD-10452 (the consent).

The Department of Planning and Environment (the department) has reviewed the nomination and information you have provided and is satisfied that this expert is suitably qualified and experienced. In accordance with Schedule 4 Condition 12 of the consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to Shonelle Gleeson-Willey, Lead Environmental Auditor from Moss Environmental to undertake the IEA and prepare the IEA report.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits. Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body and being independent of the project.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

The IEA report and your response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.

Should you wish to discuss the matter further, please me on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary



7.3 APPENDIX C- CONSULTATION

**From:** [Shane Lewinski](#)  
**To:** [Shonelle Gleeson-Willey](#)  
**Subject:** FW: Consultation request for the Stubbo Solar Farm Post-Approval Audit  
**Date:** Friday, 3 November 2023 8:33:27 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
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[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[Stubbo Solar Farm \(SSD-10452\) Post Audit response.pdf](#)  
[J132\\_Letter of consultation\\_Mid Western Regional Council.pdf](#)

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Good Morning Shonelle.

Sorry for the delay as I was waiting on internal responses from several council departments.

Please find attached Council's letter advising there are no specific comments or issues to bring to your attention in relation to the scope of the audit.

Kind regards,

Shane Lewinski  
Trainee – Town Planner  
Mid-Western Regional Council

t 02 6378 2850 |

f 02 6378 2815 | e [council@midwestern.nsw.gov.au](mailto:council@midwestern.nsw.gov.au)

a 86 Market Street | PO Box 156 Mudgee NSW 2850

w [www.midwestern.nsw.gov.au](http://www.midwestern.nsw.gov.au)

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**From:** Shonelle Gleeson-Willey <[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)>  
**Sent:** Friday, September 29, 2023 3:55 PM  
**To:** Council <[Council@midwestern.nsw.gov.au](mailto:Council@midwestern.nsw.gov.au)>  
**Subject:** Consultation request for the Stubbo Solar Farm Post-Approval Audit

Good afternoon Alina,

We would like to request to enter into a consultation process with DPE-Water, as part of the Stubbo Solar Farm Post-Approval Audit. Please refer to the attached letter for additional details.

Regards

**SHONELLE GLEESON-WILLEY**

Director and Principal Consultant



+61 (0) 419 444 669



s.gleeson-willey@mossenviro.com.au  
[www.mossenviro.com.au](http://www.mossenviro.com.au)  
 PO Box 390, Tamworth, NSW 2340  
 1/342 Peel St, Tamworth NSW 2340  
 Extra hot Cappuccino, no sugar



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**From:** [Nicole Davis](#)  
**To:** [Shonelle Gleeson-Willey](#)  
**Cc:** [Tatsiana Bandaruk](#)  
**Subject:** Heritage NSW Reply RE: Request for consultation - Stubbo Solar Farm Post Approval Audit  
**Date:** Friday, 20 October 2023 4:45:25 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image004.png](#)  
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[image013.png](#)  
[image014.png](#)

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Hi Shonelle,

My apologies for not responding, however, we receive multiple requests for us to consult in relation to audits, and we simply do not have the capacity to undertake additional engagement outside the formal DPE planning process. We are a team of 3 that have to cover all of NSW, in relation all major project referrals/approvals with respect to Aboriginal cultural heritage. I will make sure DPE know that you did seek our feedback, however, we are not in a position to provide any additional engagement at this time. I have copied in the relevant DPE Planner so they are aware of the situation.

Kind Regards  
Nicole Davis

Nicole Davis  
Manager Assessments  
Heritage NSW  
Department of Planning and Environment  
E [nicole.davis@environment.nsw.gov.au](mailto:nicole.davis@environment.nsw.gov.au)  
Locked Bag 5020 Parramatta 2124



---

**From:** Environment Line <[info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au)>  
**Sent:** Tuesday, 3 October 2023 1:36 PM  
**To:** OEH HD Heritage Mailbox <[HERITAGEMailbox@environment.nsw.gov.au](mailto:HERITAGEMailbox@environment.nsw.gov.au)>  
**Subject:** Request for consultation - Stubbo Solar Farm Post Approval Audit [ ref:\_00D7F6iTix.\_5007F1PrBJN:ref ]

----- Forwarded Message -----

**From:** Shonelle Gleeson-Willey [[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)]  
**Sent:** 29/09/2023 16:07  
**To:** [info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au)  
**Subject:** Request for consultation - Stubbo Solar Farm Post Approval Audit

Good afternoon,

We would like to request to enter into a consultation process with Heritage NSW, as part of the Stubbo Solar Farm Post-Approval Audit. Please refer to the attached letter for additional details.

Regards

**SHONELLE GLEESON-WILLEY**  
Director and Principal Consultant



+61 (0) 419 444 669  
[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)  
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 PO Box 390, Tamworth, NSW 2340  
 1/342 Peel St, Tamworth NSW 2340  
 Extra hot Cappuccino, no sugar



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**From:** [Katrina O'Reilly](#)  
**To:** [Shonelle Gleeson-Willey](#)  
**Cc:** [Behzad Farzipour](#)  
**Subject:** RE: Att: Katrina O'Reilly\_Audit Consultation for SSD-10452  
**Date:** Monday, 18 September 2023 1:11:16 PM  
**Attachments:** [image001.png](#)  
[image002.jpg](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)

---

Good afternoon Shonelle,

The department would like to below agencies to be consulted:

Local Aboriginal Land Councils  
BCS Biodiversity Conservation and Science Directorate within the Department  
Mid-Western Regional Council  
DPIE Water  
FRNSW Fire and Rescue NSW  
Heritage NSW  
RFS  
TfNSW

Scope of the audit of include:

Evidence of all relevant management plans have been approved prior to road upgrades, construction etc.

Road upgrades undertaken in accordance with Council and TfNSW requirements and evidence of undertaken prior to works occurring on site.

Evidence of compliance with access via approved entry and exit points.

Evidence of appropriate certificates obtained such as CC and OCs.

Evidence of Compliance with all commitments and actions required under all management plans (such as measures to protected flora/fauna, minimise soil and water impacts, monitoring, reporting to relevant agencies/bodies etc).

Evidence of compliance with the CEMP.

Evidence of community enhancement (VPA entered into)

Appropriate erosion and sedimentation measures/controls are in place.

Appropriate measures in place for minimise tracking of material onto the external road network.

Evidence of groundcover establishment and management.

Evidence that nay clearing has complied with EIS.

Assessment of Predicted vs actual impacts of the development.

Compliance with biodiversity offset requirements.

Compliance with noise requirements.

Measures and monitoring programs to minimise dust as a result of the development.

Evidence of protection of heritage items.

Evidence of measures/plans/programs being implemented to ensure water being managed on site and no impact off site due to water being diverted and or sediment laden water being diverted off site causing impacts on neighbours properties (condition 26 (c)).

Evidence that the Soil and water management plan has been developed in consultation with DPIE Water.

Measures and programs to minimise waste management on site.  
Management, recording, actioning and implementation of complaints register and for non-compliances and incidents.  
Website for development up to date.

If you have any questions please call me on 0429400261.

Regards  
Katrina

---

**From:** Shonelle Gleeson-Willey <s.gleeson-willey@mossenviro.com.au>  
**Sent:** Friday, 15 September 2023 12:10 PM  
**To:** Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>; DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>  
**Cc:** Behzad Farzipour <bfarzipour@pcl.com>  
**Subject:** FW: Att: Katrina O'Reilly\_Audit Consultation for SSD-10452

Hi Katrina,  
Thanks for your time on the phone just now, as discussed I'm resending this email because we have not received any correspondence from the first submission.

Have a great weekend.

Regards

	<b>SHONELLE GLEESON-WILLEY</b> <b>Director and Principal Consultant</b> <input type="checkbox"/> +61 (0) 419 444 669 <input type="checkbox"/> <a href="mailto:s.gleeson-willey@mossenviro.com.au">s.gleeson-willey@mossenviro.com.au</a> <input type="checkbox"/> <a href="http://www.mossenviro.com.au">www.mossenviro.com.au</a> <input type="checkbox"/> PO Box 390, Tamworth, NSW 2340 <input type="checkbox"/> 1/342 Peel St, Tamworth NSW 2340 <input type="checkbox"/> Extra hot Cappuccino, no sugar
	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	

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**From:** Shonelle Gleeson-Willey

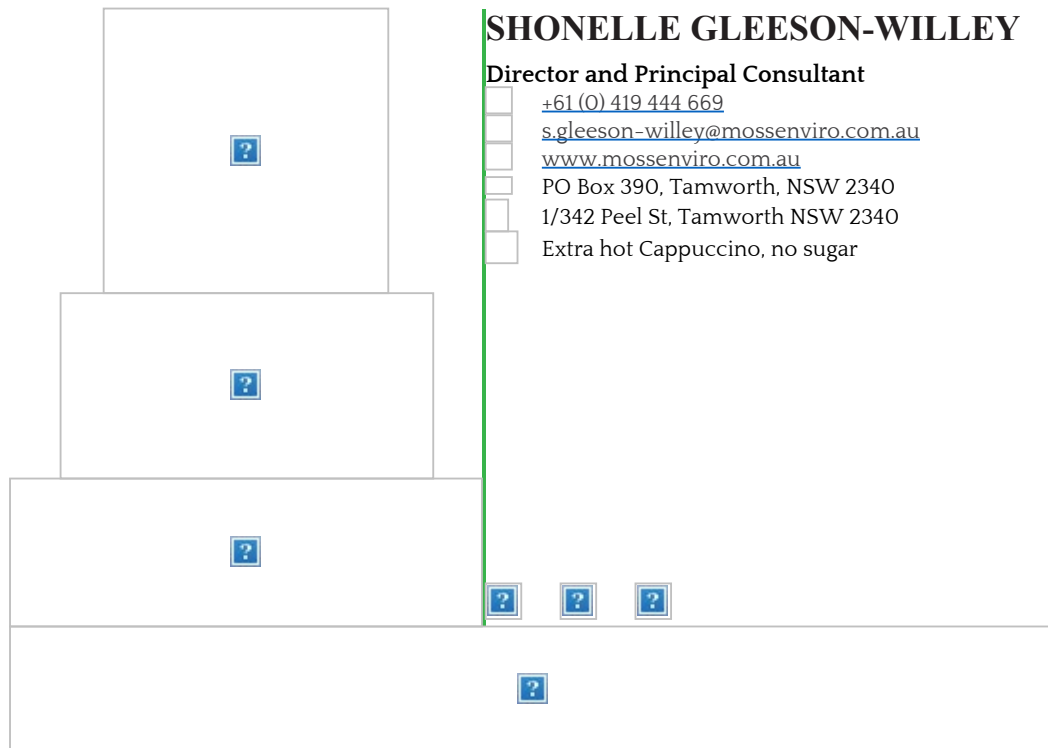
**Sent:** Monday, August 14, 2023 4:34 PM

**To:** [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

**Subject:** Att: Katrina O'Reilly\_Audit Consultation for SSD-10452

Good afternoon, Katrina,  
Please refer to the attached letter regarding consultation for the audit scope development of Stubbo Solar Farm (SSD-10452).

Regards



**SHONELLE GLEESON-WILLEY**  
**Director and Principal Consultant**  
 +61 (0) 419 444 669  
 [s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)  
 [www.mossenviro.com.au](http://www.mossenviro.com.au)  
 PO Box 390, Tamworth, NSW 2340  
 1/342 Peel St, Tamworth NSW 2340  
 Extra hot Cappuccino, no sugar

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29/09/2023

BCS - Biodiversity Conservation and Science Directorate  
Department of Planning and Environment  
Att: Lisa Menke  
Via email: [lisa.menke@environment.nsw.gov.au](mailto:lisa.menke@environment.nsw.gov.au)  
Ph: 6370 9006/ 6370 9000

CC  
([threatenedspecies.ecosystems@environment.nsw.gov.au](mailto:threatenedspecies.ecosystems@environment.nsw.gov.au) , [marc.irvin@environment.nsw.gov.au](mailto:marc.irvin@environment.nsw.gov.au) )

Dear Ms Menke,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with the BCS. I would like to enquire if the BCS has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023

29/09/2023

BCS - Biodiversity Conservation and Science Directorate  
Department of Planning and Environment  
Att: Michelle Howarth  
Via email: [michelle.howarth@environment.nsw.gov.au](mailto:michelle.howarth@environment.nsw.gov.au)  
Ph: (02) 6883 5335.

Dear Ms Howarth,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

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Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023

29/09/2023

Department of Planning and Environment - Water  
Att: Alistair Drew  
Via email: [landuse.enquiries@dpi.nsw.gov.au](mailto:landuse.enquiries@dpi.nsw.gov.au).

Dear Mr Drew,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with the Department of Planning and Environment- Water. I would like to enquire if the DPE-Water has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023



29/09/2023

Fire and Rescue NSW  
Att: Brendan Hurley  
Via email: [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au).

Dear Mr Hurley,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with Fire and Rescue NSW. I would like to enquire if FRNSW has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023

29/09/2023

Heritage NSW  
Via email: [info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au)

To whom it may concern ,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with Heritage NSW. I would like to enquire if Heritage NSW has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023

29/09/2023

Local Aboriginal Lands Council  
Mudgee LALC  
Att: Tony Lonsdale  
Via email ([mudgeelalc@bigpond.com](mailto:mudgeelalc@bigpond.com))

Dear Mr Lonsdale,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with the Local Aboriginal Lands Council. I would like to enquire if the Mudgee LALC has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023

29/09/2023

Mid-Western Regional Council  
Att: Alina Azar  
Via email: [council@midwestern.nsw.gov.au](mailto:council@midwestern.nsw.gov.au)

Dear Ms Azar,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with Mid-Western Regional Council. I would like to enquire if the Council has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023

29/09/2023

NSW Rural Fire Service

Via email: [webmaster@rfs.nsw.gov.au](mailto:webmaster@rfs.nsw.gov.au), [bryan.netzler@rfs.nsw.gov.au](mailto:bryan.netzler@rfs.nsw.gov.au)

To whom it may concern ,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

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*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with NSW Rural Fire Service. I would like to enquire if NSW RFS has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit.

Please provide a response within 21 days, by 21/10/2023.

Kind Regards

Shonelle Gleeson-Willey

As the Approved Lead Environmental Auditor 2/5/2023

29/09/2023

Transport for New South Wales  
Att: Ainsley Bruem  
Via email: [development.western@rms.nsw.gov.au](mailto:development.western@rms.nsw.gov.au)

To Ms Bruem ,

I refer to the Stubbo Solar Farm (SSD-10452) as the approved Lead Auditor by the Department of Planning and Environment (the Department) and endorsed by the Secretary, for the Post-Approval environment audit.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) – Section 3.2 for the Scope development of the Stubbo Solar Farm.

*“The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit” (page 8)*

As indicated in the above exert, The Department of Planning and Environment has required that we consult with Transport for NSW. I would like to enquire if TfNSW has any environmental issues or commentary which should be included in the audit.

Please advise of any issues or commentary in writing, that may be applicable to the Scope of the audit, within 21 days.

Kind Regards

Shonelle Gleeson-Willey  
As the Approved Lead Environmental Auditor 2/5/2023

**From:** [Katrina O'Reilly](#)  
**To:** [Shonelle Gleeson-Willey](#)  
**Subject:** RE: Att: Katrina O'Reilly\_Audit Consultation for SSD-10452  
**Date:** Thursday, 5 October 2023 12:51:58 PM  
**Attachments:** [image014.png](#)  
[image015.png](#)  
[image017.png](#)  
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[image024.png](#)  
[image025.png](#)  
[image026.png](#)  
[image027.png](#)

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Thanks Shonelle.

I don't see any need for further approvals.

I would ensure in the Audit report clearly explains that there are two different contractors, constructing/building two different components of the development and identify what contractual agreements they have with the proponent.

Regards

Katrina

**Katrina O'Reilly**  
**Team Leader Compliance**

Planning & Assessment | Department of Planning and Environment  
**T** 02 6229 7909 | **M** 0429 400261 | **E** [katrina.oreilly@planning.nsw.gov.au](mailto:katrina.oreilly@planning.nsw.gov.au)  
PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically*

---

**From:** Shonelle Gleeson-Willey <[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)>  
**Sent:** Wednesday, 4 October 2023 3:37 PM  
**To:** Katrina O'Reilly <[Katrina.OReilly@planning.nsw.gov.au](mailto:Katrina.OReilly@planning.nsw.gov.au)>  
**Subject:** RE: Att: Katrina O'Reilly\_Audit Consultation for SSD-10452

Hi Katrina,

Thanks for your time on the phone just now. As discussed, we were engaged by PCL to conduct the post-approval audit for Stubbo Solar Farm, as the head contractor. However, when I arrived on-site to carry out the site component of the audit it became apparent that there are actually two head contractors under the SSD-10452 approval, PCL for the solar farm and Transgrid for the substation and switch yard. ACEN (applicant) requested both be included in the audit. This was a simple miscommunication during the initial stages, which I believe has no bearing on the auditor approval or DPE consultation response, however would like your confirmation on this.

Do you require any additional documentation from me, prior to the audit report, seeking approval for this change?

Regards



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## SHONELLE GLEESON-WILLEY

Director and Principal Consultant

+61 (0) 419 444 669  
[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)  
[www.mossenviro.com.au](http://www.mossenviro.com.au)  
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Extra hot Cappuccino, no sugar



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---

**From:** Katrina O'Reilly <[Katrina.OReilly@planning.nsw.gov.au](mailto:Katrina.OReilly@planning.nsw.gov.au)>  
**Sent:** Monday, September 18, 2023 1:11 PM  
**To:** Shonelle Gleeson-Willey <[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)>  
**Cc:** Behzad Farzipour <[bfarzipour@pcl.com](mailto:bfarzipour@pcl.com)>  
**Subject:** RE: Att: Katrina O'Reilly\_Audit Consultation for SSD-10452

Good afternoon Shonelle,

The department would like to below agencies to be consulted:

Local Aboriginal Land Councils  
BCS Biodiversity Conservation and Science Directorate within the Department  
Mid-Western Regional Council  
DPIE Water  
FRNSW Fire and Rescue NSW  
Heritage NSW  
RFS  
TfNSW

Scope of the audit of include:



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Road upgrades undertaken in accordance with Council and TfNSW requirements and evidence of undertaken prior to works occurring on site.

Evidence of compliance with access via approved entry and exit points.

Evidence of appropriate certificates obtained such as CC and OCs.

Evidence of Compliance with all commitments and actions required under all management plans (such as measures to protected flora/fauna, minimise soil and water impacts, monitoring, reporting to relevant agencies/bodies etc).

Evidence of compliance with the CEMP.

Evidence of community enhancement (VPA entered into)

Appropriate erosion and sedimentation measures/controls are in place.

Appropriate measures in place for minimise tracking of material onto the external road network.

Evidence of groundcover establishment and management.

Evidence that any clearing has complied with EIS.

Assessment of Predicted vs actual impacts of the development.

Compliance with biodiversity offset requirements.

Compliance with noise requirements.

Measures and monitoring programs to minimise dust as a result of the development.

Evidence of protection of heritage items.

Evidence of measures/plans/programs being implemented to ensure water being managed on site and no impact off site due to water being diverted and or sediment laden water being diverted off site causing impacts on neighbours properties (condition 26 (c)).

Evidence that the Soil and water management plan has been developed in consultation with DPIE Water.

Measures and programs to minimise waste management on site.

Management, recording, actioning and implementation of complaints register and for non-compliances and incidents.

Website for development up to date.

If you have any questions please call me on 0429400261.

Regards

Katrina

---

**From:** Shonelle Gleeson-Willey <[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)>

**Sent:** Friday, 15 September 2023 12:10 PM

**To:** Katrina O'Reilly <[Katrina.OReilly@planning.nsw.gov.au](mailto:Katrina.OReilly@planning.nsw.gov.au)>; DPE PSVC Compliance Mailbox <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>

**Cc:** Behzad Farzipour <[bfarzipour@pcl.com](mailto:bfarzipour@pcl.com)>

**Subject:** FW: Att: Katrina O'Reilly\_Audit Consultation for SSD-10452

Hi Katrina,

Thanks for your time on the phone just now, as discussed I'm resending this email because we have not received any correspondence from the first submission.

Have a great weekend.

Regards



## SHONELLE GLEESON-WILLEY

Director and Principal Consultant

+61 (0) 419 444 669  
[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)  
[www.mossenviro.com.au](http://www.mossenviro.com.au)  
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Extra hot Cappuccino, no sugar



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**From:** Shonelle Gleeson-Willey

**Sent:** Monday, August 14, 2023 4:34 PM

**To:** [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

**Subject:** Att: Katrina O'Reilly\_Audit Consultation for SSD-10452

Good afternoon, Katrina,

Please refer to the attached letter regarding consultation for the audit scope development of Stubbo Solar Farm (SSD-10452).

Regards



## SHONELLE GLEESON-WILLEY

Director and Principal Consultant

+61 (0) 419 444 669  
[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)  
[www.mossenviro.com.au](http://www.mossenviro.com.au)  
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Extra hot Cappuccino, no sugar



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**From:** [Lisa Menke](#)  
**To:** [Shonelle Gleeson-Willey](#)  
**Cc:** [OEH ROGHDR OG North West Mailbox](#)  
**Subject:** RE: Consultation for the Post Approval Audit of Stubbo Solar Farm  
**Date:** Monday, 9 October 2023 1:09:15 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
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[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)

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Hi Shonelle,

Thank you for sending the email below regarding the Stubbo Solar Farm. I've referred your email to the BCS North West mailbox as the National Parks and Wildlife Service are not part of BCS. NPWS lands are not located near or adjacent to this development.

regards

**Lisa Menke**

Manager, Mudgee Area  
Blue Mountains Branch  
**NSW National Parks and Wildlife Service**

27 Inglis Street, MUDGEE 2850  
T 02 6370 9006 M 0429 687 331  
W [nationalparks.nsw.gov.au](http://nationalparks.nsw.gov.au)

---

**From:** Shonelle Gleeson-Willey <[s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)>  
**Sent:** Friday, 29 September 2023 3:38 PM  
**To:** Lisa Menke <[Lisa.Menke@environment.nsw.gov.au](mailto:Lisa.Menke@environment.nsw.gov.au)>  
**Cc:** DPIE EES Threatened Species and Ecosystems Mailbox <[ThreatenedSpecies.Ecosystems@environment.nsw.gov.au](mailto:ThreatenedSpecies.Ecosystems@environment.nsw.gov.au)>; Marc Irvin <[Marc.Irvin@environment.nsw.gov.au](mailto:Marc.Irvin@environment.nsw.gov.au)>  
**Subject:** Consultation for the Post Approval Audit of Stubbo Solar Farm

Good afternoon,



Attached is our request for consultation with BCS as part of the Stubbo Solar Farm Post-Approval Audit.

Regards



**SHONELLE GLEESON-WILLEY**

**Director and Principal Consultant**

 +61 (0) 419 444 669  
 [s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)  
 [www.mossenviro.com.au](http://www.mossenviro.com.au)  
 PO Box 390, Tamworth, NSW 2340  
 1/342 Peel St, Tamworth NSW 2340  
 Extra hot Cappuccino, no sugar



BEYOND THE GREEN LINE PODCAST

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



MID-WESTERN REGIONAL COUNCIL

PO Box 156, MUDGEES NSW 2850

86 Market Street, Mudgee | 109 Herbert Street, Gulgong | 77 Louee Street, Rylstone

T 1300 765 002 or 02 6378 2850 | F 02 6378 2815

E [council@midwestern.nsw.gov.au](mailto:council@midwestern.nsw.gov.au)

SL | LAN900112

2 November 2023

Shonelle Gleeson-Willey  
Moss Environmental  
PO BOX 390  
TAMWORTH NSW 2340

By email: [s.gleeson-willey@mossenviro.com.au](mailto:s.gleeson-willey@mossenviro.com.au)

Good Morning Shonelle

**SUBJECT: Consultation request for the Stubbo Solar Farm Post - Approval Audit**

Thank you for providing Mid-Western Regional Council with the opportunity to provide comments to the Post-Approval Audit for Stubbo Solar Farm (SSD-10452).

Council acknowledges the request from Moss Environmental as the approved lead auditor and would like to advise that there are no specific comments or issues that have been brought to Council's attention that would be applicable to the scope of the audit.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Alina Azar", is written over a light blue horizontal line.

ALINA AZAR  
DIRECTOR DEVELOPMENT  
MID-WESTERN REGIONAL COUNCIL



**MOSS**  
ENVIRONMENTAL

## 7.4 APPENDIX D – MEETING ATTENDEE REGISTER

LAT:-31.090139 LON:150.929927



0419 444 669  
ABN 53 126 494 776

admin@mossenviro.com  
www.mossenviro.com  
PO Box 390, Tamworth NSW 2340

Stubbo Solar Farm Audit - Meeting Attendee Register

Full Name	Position Title	Signature	Date: <u>26/9/2023</u> Present at opening meeting? (tick below)	Date: <u>21/9/2023</u> Present at Closing meeting? (tick Below)
Shonelle Gleeson-Willey	Lead Auditor		✓	✓
Matthew Verue	WHS Advisor	<i>[Signature]</i>	✓	
JACE WILBY	C.M	<i>[Signature]</i>	✓	✓ <i>[Signature]</i>
ANDREW BRING	Project Manager	<i>[Signature]</i>	✓	✓ <i>[Signature]</i>
Phil McVeer	C.M	<i>[Signature]</i>	✓	
Jenny Klease	HSE Advisor	<i>[Signature]</i>	✓	✓ <i>[Signature]</i>
Sai Mogalla	Junior Engineer	M.S. Anandys	✓	✓ M.S. Anandys
Mark Wintue	C.M	Mustle	✓	
Sarah Hafez	Community Engagement ACOW	<i>[Signature]</i>	✓	
DAVID MCKAY	ACOW Project Controls	<i>[Signature]</i>	✓	✓
JEFF EWERT	PCL	<i>[Signature]</i>	✓	
Behzad Farzipour	PCL	<i>[Signature]</i>	✓	✓
Ravindra K	ACE N	<i>[Signature]</i>		✓

11 Oct 2023 at 2:49 pm



7.5 APPENDIX E – INDEPENDENT AUDIT DECLARATION FORM

**Independent Audit Report Declaration Form**

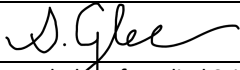
Project Name	Stubbo Solar Project
Consent Number	SSDF-10452
Description of Project	400-megawatt photovoltaic solar farm.
Project Address	Blue Springs Road, Stubbo NSW
Proponent	ACEN
Title of Audit	Independent Post-Approval Audit
Date	8/11/2023

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019).
- ii. the findings of the audit are reported truthfully, accurately and completely.
- iii. I have exercised due diligence and professional judgement in conducting the audit.
- iv. I have acted professionally, objectively and in an unbiased manner.
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child.
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child.
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a. Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b. The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both

Name of Auditor	Shonelle Gleeson-Willey
Signature	
Qualification	Bachelor of Applied Science (Environmental Management and Tourism) Master of Environmental Management
Company	Moss Environmental
Company Address	Level 1, 342 Peel Street Tamworth NSW



7.6 APPENDIX F – SITE INSPECTION AND PHOTOGRAPHS



## Stubbo Solar Farm SSD Post Approval - Site Inspection

20 Sep 2023 / Shonelle Gleeson-Willey

Complete

Score	29 / 32 (90.63%)	Flagged items	0	Actions	2
Site conducted					Field Vehicle
Conducted on					20.09.2023 09:10 AEST
Prepared by					Shonelle Gleeson-Willey
Location					Stubbo NSW 2852 Australia (-32.26070278230045, 149.5939797027519)

## Actions

2 actions

Inspection / Key areas for site inspection: / Erosion and Sediment Control  
-Evidence of a wheel wash bay/rumble grid.

Observation description

**Sand stockpiles not fenced with sediment fencing. Picked up in daily inspection but not yet recorded in daily checklist. Bam bam piling contractor. This is with Behzad question why it's not in yet. Burnt areas from 2 months ago have regenerated well, see photos.**

**To do** | Assignee **Shonelle Gleeson-Willey** | Priority **Medium** | Due **20.09.2023 08:00 AEST** | Created by **Shonelle Gleeson-Willey**

Install control as per the Erosion and Sediment Control Plan to stabilise the entry/exit point

Inspection / Key areas for site inspection: / Dust

Evidence of water cart usage.

Yes

Several water carts observed onsite spraying the road, including a mine site cart which has excellent output.

**To do** | Assignee **Shonelle Gleeson-Willey** | Priority **Low** | Due **27.09.2023 17:08 AEST** | Created by **Shonelle Gleeson-Willey**

Dust suppression

Dust is the main environmental issue noted on-site. Additional dust suppression measures should be investigated.

## Inspection

2 actions, 29 / 32 (90.63%)

Key areas for site inspection:

2 actions, 1 / 1 (100%)

Dust suppression activities?

Observation description

**2 x water cart wetting roads. Polymer being investigated for application ASAP. There are logs in stockpiles around site that will be mulched and used for mulching bunds.**

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Progressive revegetation

Observation description

**Vegetation pushed into bund along fence line. To be retained and pushed back. No seeding required yet but planned if strike not achieved.**

Observation photo

Observation Location

Observation description

**Natural reveg, good strike rate. Hydroseed planned if doesn't achieve rate. Evidence, weed contractor is J&A rural contracting, 326 black willow road, Hargraves. No contact with hydro mulch company yet.**



Photo 1

Observation photo

Observation Location

**Traffic Management Plan.  
Evidence of speed limits across site being implemented.  
Evidence of restricted access routes being enforced.**

## Observation description

**This is a very temporary crossing, the temporary crossing for construction must be in accordance with allowing fish passage. Design from SMEC is imminent which will incorporate these design requirements. Speed limit across site is 40km/hr and 10km/hr past people- drive to conditions. Speed signs at the entrance to site and on TMP. No emergency management plan on front gate.**



Photo 2

## Observation photo



Photo 3

## Observation Location

## Observation description

**Max 60 truck movements per day between PCL and Zinfra. Managed by discussions at SimOps where movements are allocated and shared. The forecast does provide a less granular view.**

## Observation photo

## Observation Location

### Waterway Crossings

Evidence that waterway crossings are designed in accordance with the Policy for Fish Friendly waterway crossings (DPI)

## Observation description

**Not in accordance yet, but a very temporary crossing awaiting design from SMEC, which is imminent. After reviewing the correspondence between Patric and DPE, the waterway crossing has been mentioned to be in accordance with guidelines for controlled activities and ' Why do fish need to cross the road', G. witheridge in the Appendix C section 2.9 of the Soil and Water Management Plan. Jason will submit a photo of the next temporary crossing under construction.**



Photo 4



Photo 5



Photo 6

## Observation photo

## Observation Location

Observation description

---

Observation photo

---

Observation Location

Fuel and Chemicals  
-Evidence of appropriate fuel and chemical storage

Observation description

**Bunded fuel storage**

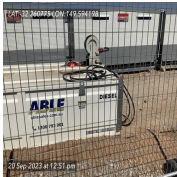


Photo 7



Photo 8



Photo 9

Observation photo

---

Observation Location

---

Observation description

---

Observation photo

---

Observation Location

Fuels and Chemicals  
-Evidence of measures to mitigate soil contamination by fuels or other chemicals.

Observation description

**Grease and small quantities of oil. At Bam Bam area.**



Photo 10



Photo 11



Photo 12

Observation photo

---

Observation Location

---

Observation description

---

Observation photo

---

Observation Location

Fuels and Chemicals  
-Chemicals and fuel storage

Observation description

**Bunded generator and bulk fuel storage. Hoses don't reach generator so will be moved.**



Photo 13



Photo 14



Photo 15

Observation photo

Observation Location

Plant and Equipment maintenance  
-Evidence of machinery maintenance and scheduled inspections.

Observation description

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Landholder consultation  
-Evidence of consultation with landholders regarding continued grazing within the project throughout operation.

Observation description

**Spoke with Janice Atkinson during audit. Very happy with Env management and consultation during whole process. Did mention that the cool burn got away in one small 5 acre section. RFS called and managed.**

Observation photo

Observation Location

Observation description

Observation photo



Observation Location

**Vegetation Plantings**

-Evidence that roadside plantings on the eastern boundary have been retained where possible.

Observation description

**No screening requirements in stage 2a. Condition doesn't apply.**

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

**Retained Vegetation**

-Evidence that the existing vegetation within the environmental exclusion zones will be retained and protected to maintain the existing level of screening.

Observation description

**Retained trees in environmental exclusion zone. Flagging of exclusion zone. Each site has been control burned as a hazard reduction and vegetation management. It was a cool burn evidenced by the regeneration in the southern portion. Managed by CBC, control burning contractors. Community consultation completed with community and landholders**



Photo 16

Observation photo



Photo 17



Photo 18



Photo 19



Photo 20



Photo 21



Photo 22

Observation Location



Photo 23

Observation description

Observation photo

Observation Location

Weed Management  
-Assess for progressive rehabilitation and weed management.

Observation description

**No weed spraying completed**



Photo 24

Observation photo

Observation location

Vehicle management  
-Evidence of appropriate parking on-site.

Observation description

**Yes**



Photo 25



Photo 26

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Erosion and Sediment Control

1 action

-Evidence of a wheel wash bay/rumble grid.

#### Observation description

**Sand stockpiles not fenced with sediment fencing. Picked up in daily inspection but not yet recorded in daily checklist. Bam bam piling contractor. This is with Behzad question why it's not in yet. Burnt areas from 2 months ago have regenerated well, see photos.**

**To do** | Assignee **Shonelle Gleeson-Willey** | Priority **Medium** | Due **20.09.2023 08:00 AEST** | Created by **Shonelle Gleeson-Willey**

Install control as per the Erosion and Sediment Control Plan to stabilise the entry/exit point

#### Observation photo



Photo 27



Photo 28



Photo 29



Photo 30



Photo 31



Photo 32



Photo 33

Observation Location

(-29.45865362388402,  
132.29835974065975)

#### Observation description

**No wheel wash or rumble grid installed yet, it's in the sub contractor scope. Anticipate to be signed and on site soon.**

#### Observation photo

Observation Location

#### Site Training

Obtain 3x names of staff on site and 1 contractors name and check all staff are suitably trained for their roles within the training register. Are they all inducted?

**Jason, Jen, Behzad.**

**SimOps meeting minutes attached showing env content.**

**Training matrix 2023 viewed. A1, Ian Eastman, HSE manager, white card, induction 23/7. A1, Ross Fitzgerald, plant operator, white card, induction 11/6, dozer and grader SOA. Hammer tech is the verification system that all credentials are up loaded into. The applicant is then reviewed and approved by PCL HSE Admin, and security at the front gate sign in new workers or visitors. If they are not approved on hammertech they will have to sign in as a visitor and are sent straight to HSE admin.**

**PCL**

**Evidence in training matrix 2023, TNA. Indicates what training is required.**

**HSE admin has a separate SS called pacific rim -HSE training database 02-08-2023. This is reviewed**

monthly and a report generated for management. Additional in house training is recorded on cornerstone and transposed into the SS. Jenny the HSE supervisor checks all the requirements using her experience as a construction HSE over the last 2 years with PCL and since 1982 in other related roles.

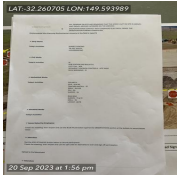


Photo 34



Photo 35

Dust

1 action, 1 / 1 (100%)

Evidence of water cart usage.

Yes

Several water carts observed onsite spraying the road, including a mine site cart which has excellent output.

**To do** | Assignee **Shonelle Gleeson-Willey** | Priority **Low** | Due **27.09.2023 17:08 AEST** | Created by **Shonelle Gleeson-Willey**

Dust suppression

Dust is the main environmental issue noted on-site. Additional dust suppression measures should be investigated.

Evidence



Photo 36

Evidence that vehicles movement on-site are being optimised for efficiency and dust mitigation.

**Mini buses being used to bus workers, observed in car park. Material being delivered directly to the spot on site they are required to prevent double handling.. the extensive reuse of site won material. All the granite material, rock and wood chip.**



Photo 37

Evidence

Truck movements

Evidence that truck loads are being appropriately covered when transporting on public roads.

**N/A no loaded trucks going offsite.**

Evidence

## Visual Impacts

-Off-site visual impacts including advertising signage and paint colours.

### Observation description

**The front entrance of the site is very unobtrusive. Has only minimal signage.**



Photo 38



Photo 39



Photo 40



Photo 41



Photo 42



Photo 43



Photo 44



Photo 45

### Observation Photo

### Observation location

## Visual Impacts

-Night-time visual assessment for lighting impacts.

### Observation description

**The number and type of lights were observed during the site inspection. Lighting is minimal and only for security purposes. No complaints from neighbours regarding lighting.**

### Observation Photo

### Observation location

## Heritage

-Placement and robustness of Heritage Management Plan exclusion zone fencing.

### Observation description

**Flagging outside site boundary. Fencing has been altered to run around the heritage sites. No heritage site inside site boundary**

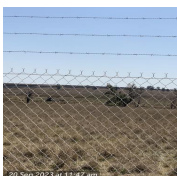


Photo 46

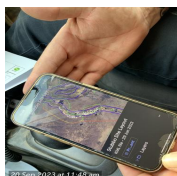


Photo 47



Photo 48

### Observation Photo

Use of flagging outside the boundary and eight foot chain link on project boundary



Photo 49



Photo 50

Observation Location

Fire Management

-Asset protection zones and on-site firefighting equipment.

Observation description

**APZ is the 20m around the fence line, all cleared of vegetation. Fire extinguishers, dedicated water tank with the RFS connection, engaged RFS on site and did a show and tell. Water carts are also as grass fire protection**



Photo 51

Observation Photo



Photo 52



Photo 53

Observation Location

Waste Management

Evidence of the application of the resource recovery hierarchy principles (avoid, reduce, reuse, recycle, recover, disposal).

Observation description

**Yes, reuse evident through consultation with community groups. Men's shed. Excellent example of forethought, planning and community engagement**



Photo 54

Observation Photo



Photo 55

Observation Location

(-32.26085249123181,  
149.59415298615724)

EIS mitigation measures

28 / 31 (90.32%)

Clearing protocols will be developed that identify vegetation to be retained, prevent inadvertent damage and reduce soil disturbance (e.g. removal of native vegetation by chainsaw instead of heavy machinery where only partial clearing is proposed). Fencing (or other barriers as required) and signage will be placed around those areas of vegetation to be maintained to prevent any accidental construction damage and provide a permanent barrier between the development footprint and retained areas. The type of fencing during construction may be of a temporary nature and scale that is robust enough to withstand damage during this stage of work. Use of appropriate machinery for vegetation removal adjacent to retained areas.

Yes

Circles and blank space is areas of retained trees

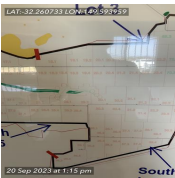


Photo 56

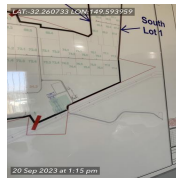


Photo 57

Observation Location

Observation photo

Observation description

Pre-clearance surveys will be undertaken prior to tree clearing. Active breeding or nesting identified during pre-clearance surveys will be avoided in August, September and October which is the breeding/nesting period for most fauna species. A qualified ecologist/licenced wildlife handler will supervise tree removal in accordance with best practise methods.

Yes

Observation photo

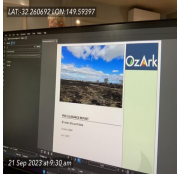


Photo 58

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Observation Location

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Observation description

---

A procedure will be developed for the relocation of habitat features (e.g. fallen timber, hollow logs) to adjacent retained habitat.

Yes

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Observation photo

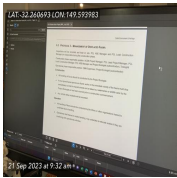


Photo 59

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Observation Location

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Observation description

---

**Jason demonstrated the snake capture and relocation whilst on site. Two PCL staff are trained in snake handling by SSS.**

---

Monitoring will be undertaken within the environmental exclusion zones to ensure biodiversity values are not significantly affected by indirect impacts. This may include:

- comparison against EIS baseline monitoring
- consideration of natural seasonal variation
- development of trigger values for the commencement of adaptive management actions
- details of proposed adaptive management actions to reduce or eliminate recorded impacts.

Yes

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Observation photo

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Observation Location

---

Observation description

---

**The Biodiversity Management Plan by OzArk includes bird monitoring and adaptive management**

---

Appropriate controls will be implemented to manage exposed soil surfaces and stockpiles to prevent sediment discharge into waterways



Yes

Observation photo

Observation Location

Observation description

All works within proximity to the drainage lines will have adequate sediment and erosion controls (e.g. sediment barriers, sedimentation ponds). Revegetation will also commence as soon as is practicable to minimise risks of erosion.

Yes

Observation photo

Observation Location

Observation description

Construction works will only be undertaken during daylight hours and night lights will not be used. Lights associated with operation will be directional to avoid unnecessarily shining light into adjacent retained vegetation where possible.

Yes

Security lighting is used.

Observation photo

Observation location

Observation description

Dust suppression measures will be implemented to limit dust on site. Revegetation will also be commenced as soon as practicable to minimise areas likely to create dust.

Yes

Observation photo

Observation location

Observation description

All machinery will be cleaned prior to entering and exiting the study area to minimise the transport of

weeds to vegetated areas to be retained. Weeds that are present within the study area that are listed under the NSW Biosecurity Act 2015 will be managed.

Yes

Observation photo

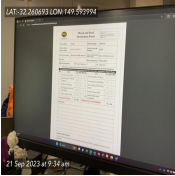


Photo 60

Observation location

observation description

All personnel working on the project will undertake an environmental induction as part of their site

familiarisation. This will include:

- site environmental procedures (vegetation management, sediment and erosion control, exclusion fencing and noxious weeds)
- what to do in case of environmental emergency (e.g. chemical spills, fire, injured fauna)
- key contacts in the case of an environmental emergency.

Yes

Observation photo

Observation location

Observation description

**Auditor completed the site induction. Emergency plan ACEN, 2012221136, 17/5/2023 sighted in gate house. Delivery driver induction sighted in security office.**

A Traffic Management Plan will be developed which includes speed limits and controls to reduce risk of fauna strike. Any vehicle strike incidents will be recorded.

Yes

Observation photo

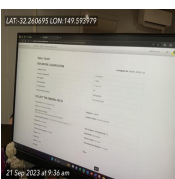


Photo 61

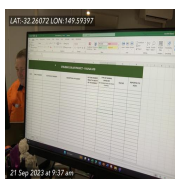


Photo 62

Observation location

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Observation description

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A strategy will be developed and implemented to protect vegetation and habitat adjacent to the project.

This will outline the following:

- rubbish disposal guidance
  - prohibition of wood collection
  - prohibition of lighting of fires
  - no-go-zones for native vegetation outside the development footprint
  - speed limits on the surrounding road network
- 

Observation photo

---

Observation location

---

Observation description

---

Suitable species will be used as ground cover species in any revegetation areas.

Yes

Jason stated that an approved seed mix has been provided.

---

Observation photo

---

Observation location

---

Observation description

---

The proponent will develop the ACHMP which is to be agreed to by the RAPs and DPIE. The ACHMP will also include an unanticipated finds protocol, unanticipated skeletal remains protocol and long-term management of any artefacts.

Yes

Observation photo

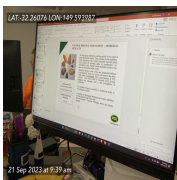


Photo 63

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Observation location

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Observation description

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The Aboriginal site (Rosevale IF-01) within the development footprint for the project will be

salvaged by a surface collection of visible artefacts. The recommended methodology for the salvage will be finalised after the approvals process has been completed in the ACHMP but will include the measures outlined in Section 9.3.1 of the ACHAR (Appendix x). The salvage works will include the mapping, analysis and collection of the surface artefact at the affected site. Results will be included in a brief report to preserve the data in a useable form and an Aboriginal Site Impact Recording Form (ASIRF) will be submitted to AHIMS.

Yes

An RFI was issued and the fence coordinates changed to keep it outside the fence line

Observation photo

Observation location

Observation description

All land-disturbing activities will be confined to within the development footprint and associated tracks and/or crossings. Should the parameters of the proposed work extend beyond this, then further archaeological assessment may be required.

Yes

Observation photo

Observation location

Observation description

If items of historic heritage significance are uncovered during the project, then the Unanticipated Finds Protocol for Historic Heritage included in Appendix 5 of the Aboriginal cultural heritage and historic heritage assessment (Appendix x) will be enacted.

N/A

Observation photo

Observation location

Observation description

To avoid the potential for harm to historic objects on unassessed adjacent landforms, all ground surface disturbing activities will be confined to the development footprint.

Yes

Observation photo

Observation location

Observation description

An unanticipated finds protocol for historic heritage will be developed and implemented as required during construction.

Yes

Observation photo

Observation location

Observation description

**In site induction**

Disturbed areas will be progressively stabilised and rehabilitated as construction is completed to minimise the extent of bare soil.

Yes

Observation photo

Observation location

Observation description

The following measures will be implemented to manage the risk of contaminants and impacts on surrounding environments:

- appropriate storage (including bunding) of all potential contaminants (i.e. chemicals and fuels) onsite to reduce risks of spills contaminating waterways and land
- protocol for the discovery of contaminants in the study area during works, including requirements

to stop work, remediate and dispose of contaminants as necessary

- measures for mitigating soil contamination by fuels or other chemicals (including notification to EPA, emergency response requirements etc)
- measures for the ongoing inspection and maintenance of machinery/vehicles to ensure that they remain in a clean condition free of fluid leaks.

Yes

Other photo

Other location

Other description

The photovoltaic arrays will be designed to allow for enough space between rows of panels for

establishment of groundcover and implementation of weed controls.

Yes



Photo 64

Description

Other photo

Other location

Biosecurity management will include:

- measures to manage the impacts of weeds, disease and pest animals during construction, operation, and decommissioning activities
- biosecurity response measures where impacts are identified
- contingency measures in the event that existing measures are inadequate in managing the risk/impact.

Yes

Observation Photo

Observation Location

Observation description

Construction noise and vibration management measures will be implemented consistent with recommendations contained within the ICNG.

Yes

Observation description

UPCVAC will continue to consult with Mid-Western Regional Council to agree the appropriate treatment or upgrade requirements for the safe use of Blue Springs Road during construction and the process for undertaking any treatment or upgrade works in accordance with Development Consent conditions

Observation description

Observation photo

UPCVAC will continue to consult with Mid-Western Regional Council to agree the appropriate treatment or upgrade requirements for the safe use of Blue Springs Road during construction and the process

for undertaking any treatment or upgrade works in accordance with Development Consent conditions

Observation description

No infrastructure will be placed within 20 m of any Strahler 3 or above order streams.

Yes

Environmental exclusion areas.



Photo 65

Observation description

Observation phtot

The use of any farms dams during construction will be agreed with the landholder and the estimated maximum harvestable right dam capacity will not be exceeded.

Yes

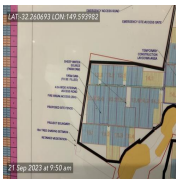


Photo 66

Observation description

**Has not started. But dam retention designed into project.**

Observation Photo

All waste generated from the project will be assessed, classified and managed in accordance with the Waste Classification Guidelines (EPA, 2014)

N/A

Observation description

**No waste going offsite. See Tom or terry for docket**

Observation photo

Observation location

Wastes will be disposed of at suitable facilities permitted to

Yes

accept the waste



Observation photo

Skip bins will be made available onsite to enable waste separation for recycling (e.g. separate skip bins for cardboard recycling, plastics and timber collection)



Observation description

Observation Photo

General waste bins will be provided for disposal of materials that cannot be cost-effectively recycled



Observation description

Observation Photo

The site septic system will be installed and operated in accordance with Council regulations



Toilets have self contained tanks

Observation description

Observation Photo

Water trucks will be used for dust suppression along internal, unsealed access roads and disturbed areas when required (i.e. if visible dust emissions are observed).



Observation description

Observation Photo

Good house keeping. Example of well made road in the area of active construction. Traffic management plan



Photo 67



Photo 68



Photo 69



Photo 70



Photo 71



Photo 72





Photo 73



Photo 74



Photo 75



Photo 76

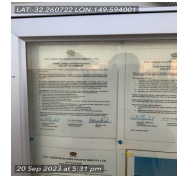


Photo 77



Photo 78

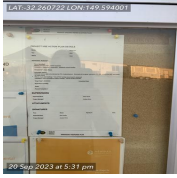


Photo 79

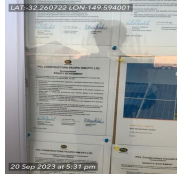


Photo 80

## Media summary



Photo 1

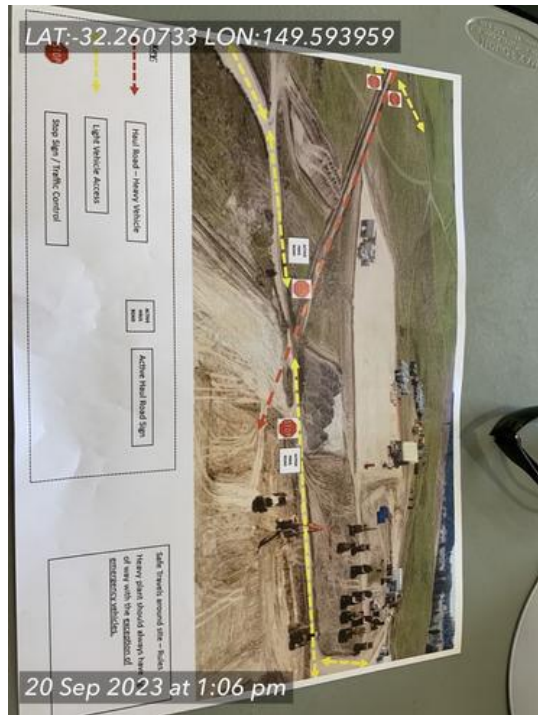


Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7

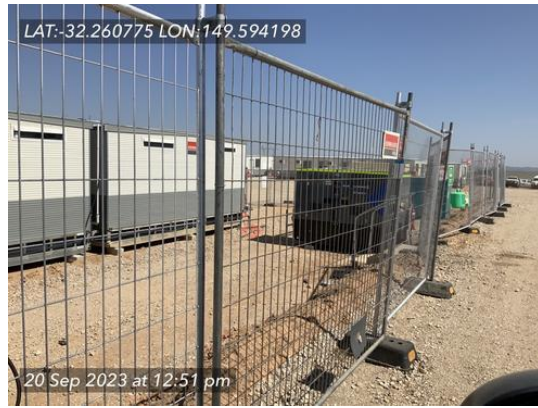


Photo 8



Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14

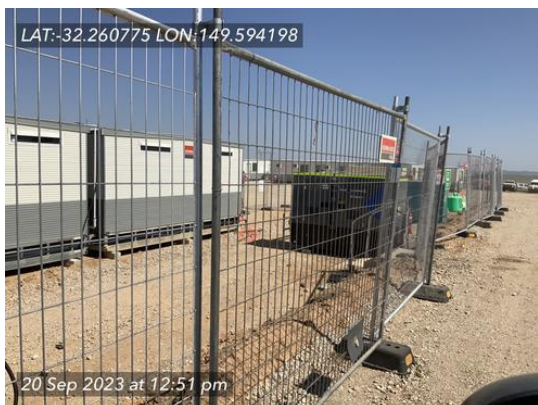


Photo 15



Photo 16



Photo 17



Photo 18



Photo 19



Photo 20



Photo 21



Photo 22



Photo 23



Photo 24



Photo 25



Photo 26



Photo 27



Photo 28



Photo 29



Photo 30



Photo 31



Photo 32





Photo 33

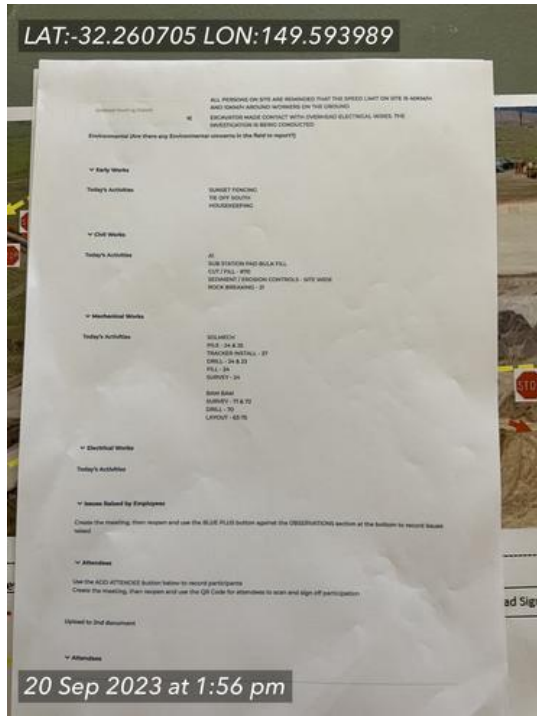


Photo 34



Photo 35



Photo 36



Photo 37



Photo 38



Photo 39



Photo 40



Photo 41



Photo 42



Photo 43



Photo 44



Photo 45



Photo 46

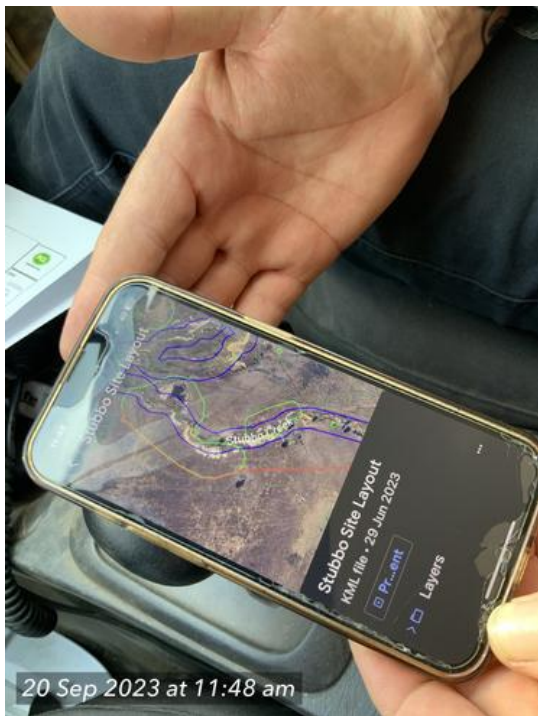


Photo 47



Photo 48



Photo 49



Photo 50



Photo 51



Photo 52



Photo 53



Photo 54



Photo 55

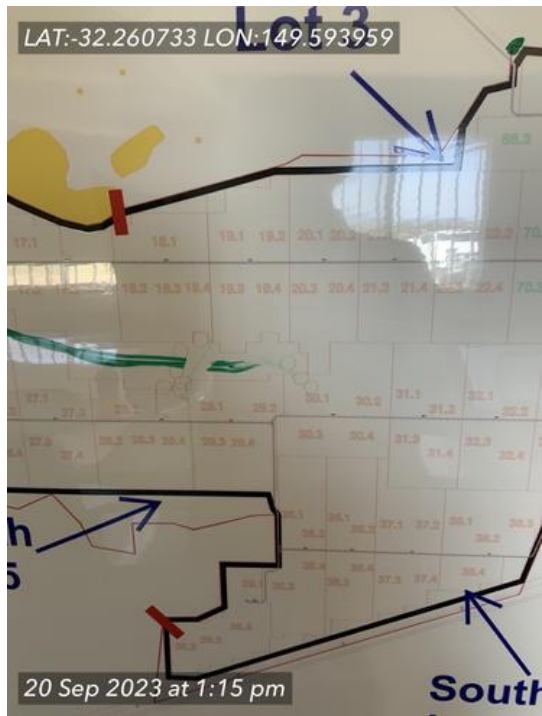


Photo 56

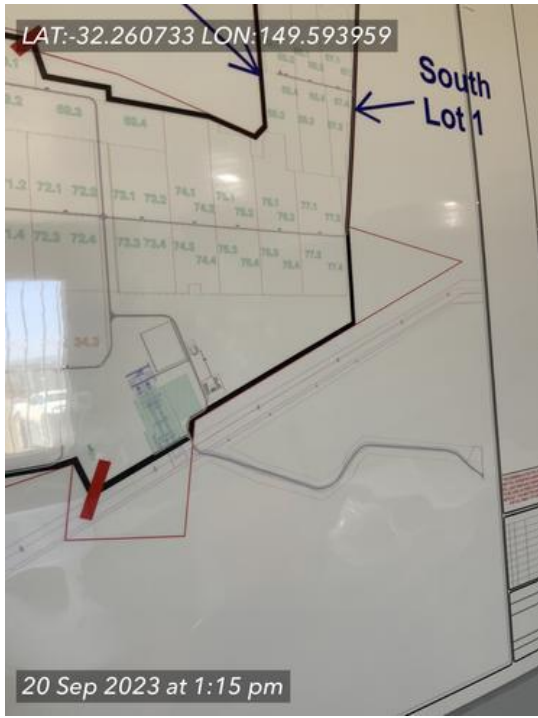


Photo 57

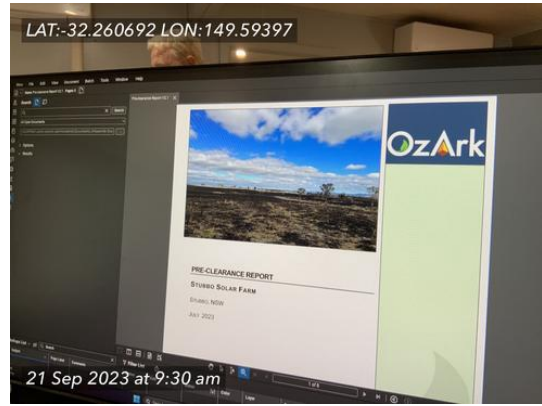


Photo 58

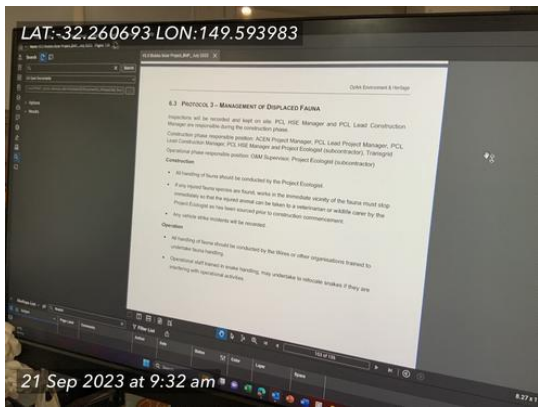


Photo 59

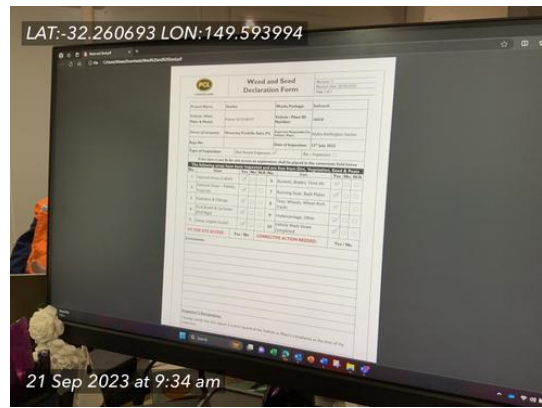


Photo 60

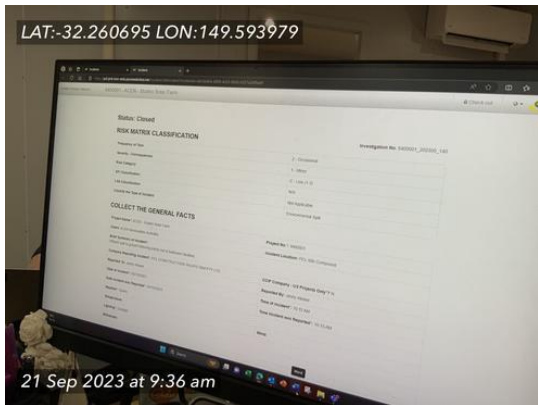


Photo 61

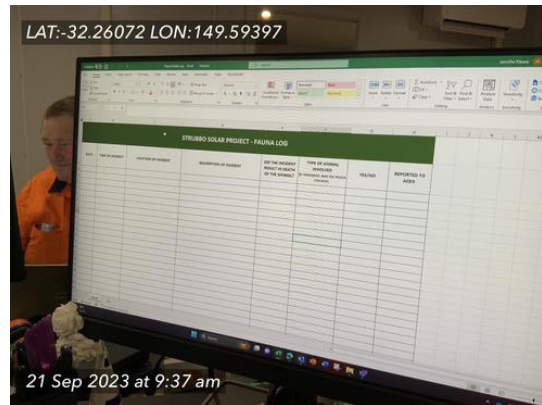


Photo 62

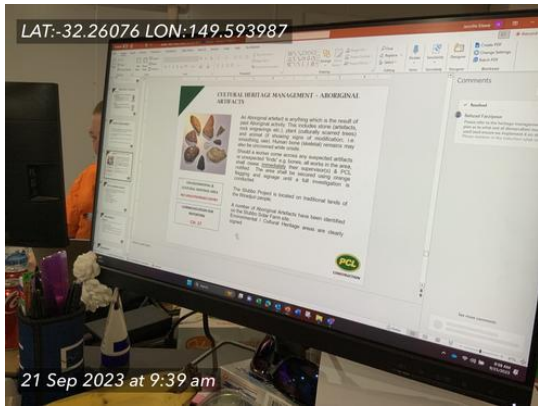


Photo 63



Photo 64



Photo 65



Photo 66



Photo 67



Photo 68





Photo 69



Photo 70



Photo 71



Photo 72



Photo 73



Photo 74



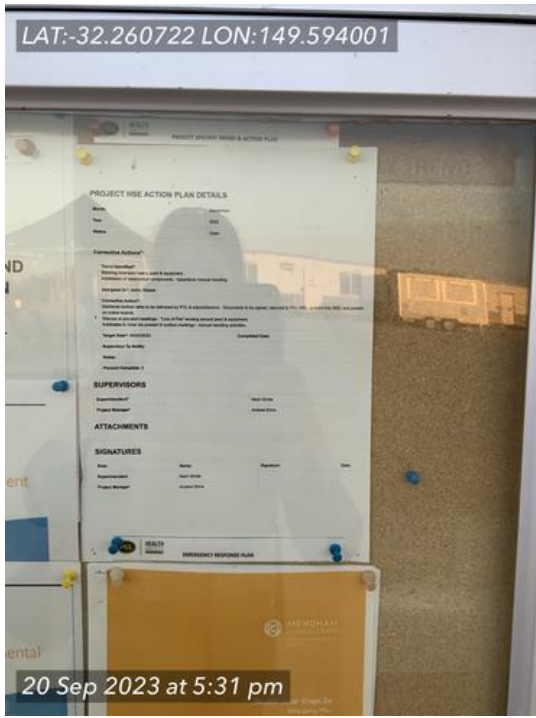


Photo 79



Photo 80



## Stubbo Solar Farm SSD Post Approval - Site Inspection

20 Sep 2023 / Shonelle Gleeson-Willey

Complete

Score	0 / 35 (0%)	Flagged items	1	Actions	0
Site conducted				Marked as 'my site is not listed here'	
Conducted on				20.09.2023 15:17 AEST	
Prepared by				Shonelle Gleeson-Willey	
Location				Zinfra site Stubbo NSW 2852 Australia (-32.2626730611513, 149.59174218918446)	

## Flagged items

1 flagged

Inspection / Key areas for site inspection: / Dust

Evidence of water cart usage.

No

**Inspection**

1 flagged, 0 / 35 (0%)

Key areas for site inspection:

1 flagged, 0 / 1 (0%)

Dust suppression activities?

Observation description

**Water carts were observed during the site walk around. It was observed that the site had recently been sprayed.**



Photo 1

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Progressive revegetation

Observation description

**There is no progressive revegetation because the entire site is active.**

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Traffic Management Plan.  
Evidence of speed limits across site being implemented.  
Evidence of restricted access routes being enforced.

Observation description



Photo 2

---

Observation photo

---

Observation Location

---

Observation description

---

Observation photo

---

Observation Location

**Waterway Crossings**  
Evidence that waterway crossings are designed in accordance with the Policy for Fish Friendly waterway crossings (DPI)

---

Observation description

**NA**

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Observation photo

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Observation Location

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Observation description

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Observation photo

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Observation Location

**Fuel and Chemicals**  
-Evidence of appropriate fuel and chemical storage

---

Observation description



Photo 3

---

Observation photo

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Observation Location

---

Observation description

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Observation photo

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Observation Location

Fuels and Chemicals  
-Evidence of measures to mitigate soil contamination by fuels or other chemicals.

Observation description

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Observation photo

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Observation Location

---

Observation description

---

Observation photo

---

Observation Location

Fuels and Chemicals  
-Chemicals and fuel storage

Observation description

**Self bunded container.**



Photo 4

---

Observation photo

---

Observation Location

Plant and Equipment maintenance  
-Evidence of machinery maintenance and scheduled inspections.

Observation description

---

Observation photo

---

Observation Location

---

Observation description

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Observation photo

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Observation Location

Landholder consultation  
-Evidence of consultation with landholders regarding continued grazing within the project throughout operation.

Observation description

NA

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Vegetation Plantings  
-Evidence that roadside plantings on the eastern boundary have been retained where possible.

Observation description

NA

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Retained Vegetation  
-Evidence that the existing vegetation within the environmental exclusion zones will be retained and protected to maintain the existing level of screening.

Observation description

**Vegetation retained outside the project boundaries.**

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Weed Management

-Assess for progressive rehabilitation and weed management.

Observation description

**Weed communication**



Photo 5



Photo 6

Observation photo

Observation location

Vehicle management

-Evidence of appropriate parking on-site.

Observation description

**Good vehicle parking area.  
Good signage.**



Photo 7

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Erosion and Sediment Control

-Evidence of a wheel wash bay/rumble grid.

Observation description

**Rock check dams**



Photo 8



Photo 9

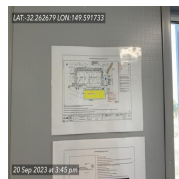


Photo 10



Photo 11



Photo 12

Observation photo

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Observation Location

---

Observation description

---

Observation photo

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Observation Location

### Site Training

Obtain 3x names of staff on site and 1 contractors name and check all staff are suitably trained for their roles within the training register. Are they all inducted?

Dust

1 flagged, 0 / 1 (0%)

Evidence of water cart usage.

**No**

Evidence

---

Evidence that vehicles movement on-site are being optimised for efficiency and dust mitigation.

---

Evidence

### Truck movements

Evidence that truck loads are being appropriately covered when transporting on public roads.

---

Evidence

### Visual Impacts

-Off-site visual impacts including advertising signage and paint colours.

Observation description



Photo 13

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Observation Photo

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Observation location

Visual Impacts  
-Night-time visual assessment for lighting impacts.

Observation description

Observation Photo

Observation location

Heritage  
-Placement and robustness of Heritage Management Plan exclusion zone fencing.

Observation description

Observation Photo

Observation Location

Fire Management  
-Asset protection zones and on-site firefighting equipment.

Observation description

Observation Photo

Observation Location

Waste Management  
Evidence of the application of the resource recovery hierarchy principles (avoid, reduce, reuse, recycle, recover, disposal).

Observation description

**Only general. No construction waste being generated.**



Photo 14

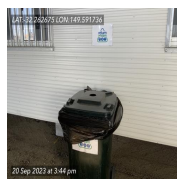


Photo 15

Observation Photo

Observation Location

EIS mitigation measures

0 / 34 (0%)

Clearing protocols will be developed that identify vegetation to be retained, prevent inadvertent damage and reduce soil disturbance (e.g. removal of native vegetation by chainsaw instead of heavy

machinery where only partial clearing is proposed). Fencing (or other barriers as required) and signage will be placed around those areas of vegetation to be maintained to prevent any accidental construction damage and provide a permanent barrier between the development footprint and retained areas. The type of fencing during construction may be of a temporary nature and scale that is robust enough to withstand damage during this stage of work. Use of appropriate machinery for vegetation removal adjacent to retained areas.

---

Observation Location

---

Observation photo

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Observation description

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Pre-clearance surveys will be undertaken prior to tree clearing. Active breeding or nesting identified during pre-clearance surveys will be avoided in August, September and October which is the breeding/nesting period for most fauna species. A qualified ecologist/licenced wildlife handler will supervise tree removal in accordance with best practise methods.

---

Observation photo

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Observation Location

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Observation description

---

A procedure will be developed for the relocation of habitat features (e.g. fallen timber, hollow logs) to adjacent retained habitat.

---

Observation photo

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Observation Location

---

Observation description

---

Monitoring will be undertaken within the environmental exclusion zones to ensure biodiversity values are not significantly affected by indirect impacts. This may include:

- comparison against EIS baseline monitoring
- consideration of natural seasonal variation
- development of trigger values for the commencement of adaptive management actions
- details of proposed adaptive management actions to reduce or eliminate recorded impacts.

---

Observation photo

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Observation Location

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Observation description

---

Appropriate controls will be implemented to manage exposed soil surfaces and stockpiles to prevent sediment discharge into waterways

---

Observation photo

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Observation Location

---

Observation description

---

All works within proximity to the drainage lines will have adequate sediment and erosion controls (e.g. sediment barriers, sedimentation ponds). Revegetation will also commence as soon as is practicable to minimise risks of erosion.

---

Observation photo

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Observation Location

---

Observation description

---

Construction works will only be undertaken during daylight hours and night lights will not be used. Lights associated with operation will be directional to avoid unnecessarily shining light into adjacent retained vegetation where possible.

---

Observation photo

---

Observation location

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Observation description

---

Dust suppression measures will be implemented to limit dust on site. Revegetation will also be commenced as soon as practicable to minimise areas likely to create dust.

---

Observation photo

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Observation location

---

Observation description

---

All machinery will be cleaned prior to entering and exiting the study area to minimise the transport of weeds to vegetated areas to be retained. Weeds that are present within the study area that are

listed  
under the NSW Biosecurity Act 2015 will be managed.

---

Observation photo

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Observation location

---

observation description

---

All personnel working on the project will undertake an environmental induction as part of their site familiarisation. This will include:

- site environmental procedures (vegetation management, sediment and erosion control, exclusion fencing and noxious weeds)
  - what to do in case of environmental emergency (e.g. chemical spills, fire, injured fauna)
  - key contacts in the case of an environmental emergency.
- 

Observation photo

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Observation location

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Observation description

---

A Traffic Management Plan will be developed which includes speed limits and controls to reduce risk of fauna strike. Any vehicle strike incidents will be recorded.

---

Observation photo

---

Observation location

---

Observation description

---

A strategy will be developed and implemented to protect vegetation and habitat adjacent to the project.

This will outline the following:

- rubbish disposal guidance
  - prohibition of wood collection
  - prohibition of lighting of fires
  - no-go-zones for native vegetation outside the development footprint
  - speed limits on the surrounding road network
- 

Observation photo

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Observation location

---

Observation description

---

Suitable species will be used as ground cover species in any revegetation areas.

---

Observation photo

---

Observation location

---

Observation description

---

The proponent will develop the ACHMP which is to be agreed to by the RAPs and DPIE. The ACHMP will also include an unanticipated finds protocol, unanticipated skeletal remains protocol and long-term management of any artefacts.

---

Observation photo

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Observation location

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Observation description

---

The Aboriginal site (Rosevale IF-01) within the development footprint for the project will be salvaged by a surface collection of visible artefacts. The recommended methodology for the salvage will be finalised after the approvals process has been completed in the ACHMP but will include the measures outlined in Section 9.3.1 of the ACHAR (Appendix x). The salvage works will include the mapping, analysis and collection of the surface artefact at the affected site. Results will be included in a brief report to preserve the data in a useable form and an Aboriginal Site Impact Recording Form (ASIRF) will be submitted to AHIMS.

---

Observation photo

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Observation location

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Observation description

---

All land-disturbing activities will be confined to within the development footprint and associated tracks and/or crossings. Should the parameters of the proposed work extend beyond this, then further archaeological assessment may be required.

---

Observation photo

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Observation location

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Observation description

---

If items of historic heritage significance are uncovered during the project, then the Unanticipated Finds Protocol for Historic Heritage included in Appendix 5 of the Aboriginal cultural heritage and



historic heritage assessment (Appendix x) will be enacted.

---

Observation photo

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Observation location

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Observation description

---

To avoid the potential for harm to historic objects on unassessed adjacent landforms, all ground surface disturbing activities will be confined to the development footprint.

---

Observation photo

---

Observation location

---

Observation description

---

An unanticipated finds protocol for historic heritage will be developed and implemented as required during construction.

---

Observation photo

---

Observation location

---

Observation description

---

Disturbed areas will be progressively stabilised and rehabilitated as construction is completed to minimise the extent of bare soil.

---

Observation photo

---

Observation location

---

Observation description

---

The following measures will be implemented to manage the risk of contaminants and impacts on surrounding environments:

- appropriate storage (including bunding) of all potential contaminants (i.e. chemicals and fuels) onsite to reduce risks of spills contaminating waterways and land
  - protocol for the discovery of contaminants in the study area during works, including requirements to stop work, remediate and dispose of contaminants as necessary
  - measures for mitigating soil contamination by fuels or other chemicals (including notification to EPA, emergency response requirements etc)
  - measures for the ongoing inspection and maintenance of machinery/vehicles to ensure that they remain in a clean condition free of fluid leaks.
-

Other photo

---

Other location

---

Other description

---

The photovoltaic arrays will be designed to allow for enough space between rows of panels for establishment of groundcover and implementation of weed controls.

---

Description

---

Other photo

---

Other location

---

Biosecurity management will include:

- measures to manage the impacts of weeds, disease and pest animals during construction, operation, and decommissioning activities
  - biosecurity response measures where impacts are identified
  - contingency measures in the event that existing measures are inadequate in managing the risk/impact.
- 

Observation Photo

---

Observation Location

---

Observation description

---

Construction noise and vibration management measures will be implemented consistent with recommendations contained within the ICNG.

---

Observation description

---

UPCVAC will continue to consult with Mid-Western Regional Council to agree the appropriate treatment or upgrade requirements for the safe use of Blue Springs Road during construction and the process for undertaking any treatment or upgrade works in accordance with Development Consent conditions

---

Observation description

---

Observation photo

---

UPCVAC will continue to consult with Mid-Western Regional Council to agree the appropriate treatment or upgrade requirements for the safe use of Blue Springs Road during construction and the process for undertaking any treatment or upgrade works in accordance with Development Consent conditions

---

Observation description

---

No infrastructure will be placed within 20 m of any Strahler 3 or above order streams.

---

Observation description

---

Observation photo

---

The use of any farms dams during construction will be agreed with the landholder and the estimated maximum harvestable right dam capacity will not be exceeded.

---

Observation description

---

Observation Photo

---

All waste generated from the project will be assessed, classified and managed in accordance with the Waste Classification Guidelines (EPA, 2014)

---

Observation description

---

Observation photo

---

Observation location

---

Wastes will be disposed of at suitable facilities permitted to accept the waste

---

Observation photo

---

Skip bins will be made available onsite to enable waste separation for recycling (e.g. separate skip bins for cardboard recycling, plastics and timber collection)

---

Observation description

---

Observation Photo

---

General waste bins will be provided for disposal of materials that cannot be cost-effectively recycled

---

Observation description

---

Observation Photo

---

The site septic system will be installed and operated in accordance with Council regulations

---

Observation description

---

Observation Photo

---

Water trucks will be used for dust suppression along internal, unsealed access roads and disturbed areas when required (i.e. if visible dust emissions are observed).

---

Observation description

---

Observation Photo

Good housekeeping



Photo 16



Photo 17

---

## Media summary



Photo 1



Photo 2



Photo 3



Photo 4

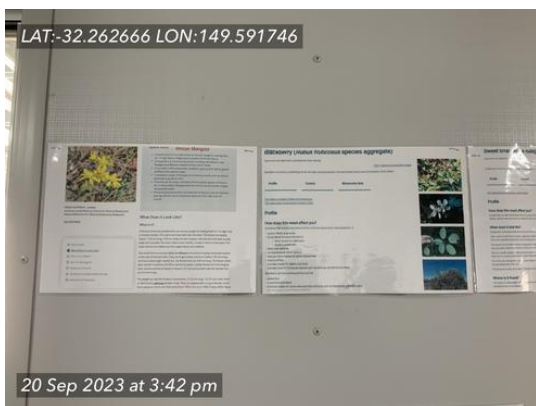


Photo 5

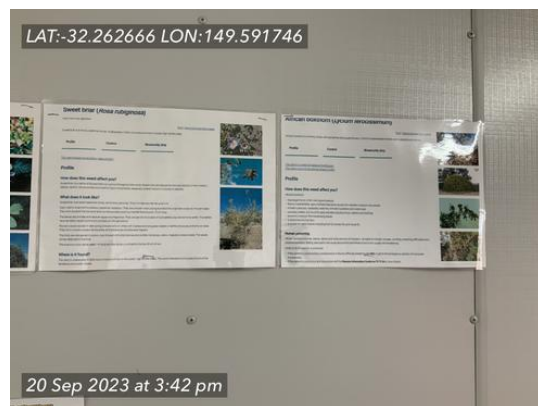


Photo 6



Photo 7



Photo 8



Photo 9

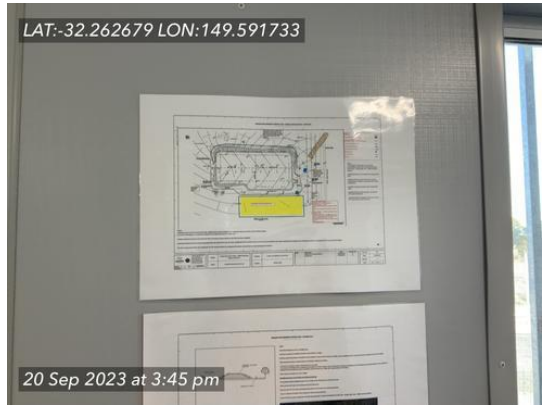


Photo 10

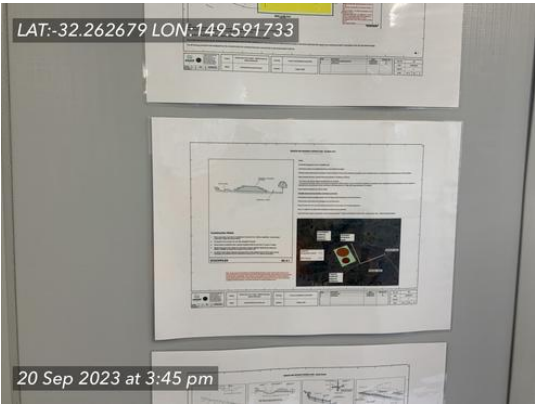


Photo 11

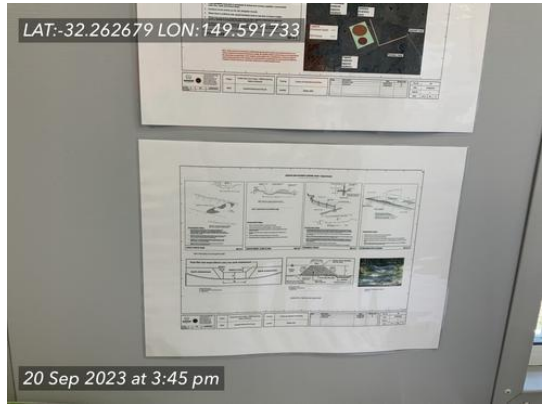


Photo 12



Photo 13



Photo 14



Photo 15



Photo 16



Photo 17



7.7 APPENDIX G – SITE INTERVIEWS





## Stubbo Solar Farm Post-Approval Audit - Staff Interviews

21 Sep 2023 / Shonelle Gleeson-Willey

Complete

Score	0 / 0 (0%)	Flagged items	0	Actions	0
Site conducted				Marked as 'my site is not listed here'	
Conducted on					21.09.2023 11:37 AEST
Prepared by					Shonelle Gleeson-Willey
Location					(-32.26075738498794, 149.5939253928651)

## Inspection

### Staff Interview Introduction

Name of interviewed staff member and list their position description

**Ian Eastman-HSE Manager  
Justin Edwards-Construction  
Manager**

### Implementation of the Environmental Management Strategy

In your own words describe the intent of the EMS and how it interacts with the other Management Plans and Systems.

**It's integrated into their plan its to protect the environment and sustainability and rehabilitation of the projects lifespans. Protect local fauna and limit the nuisance towards local communities. Limit dust and implemented erosion and sediment controls and comply with legislative requirements.**

Do you think the current EMS is effective? Give reasons how and why you believe the Plan is or is not effective.

**It's early days in the site but from the clients side they do seem to have everything together and are very professional and pro-active.**

### General Environmental Principles

Explain the adopted General Environmental Principles

**It's the first statement I gave. Limit the impact on the environment. Limit impact on local communities.. Manage waste correctly including segregation. Managing dust through dust suppression.**

### Project relationship

Explain the relationship between ACEN, PCL and Transgid on this project

**A1 is probably one step down. PCL is the EPC. TransGrid is their own identity. ACEN is the client. Our line in the chain is direct to PCL. ACEN will put their direction through PCL to us.**

How is communication managed?

**Through the normal process of simop meetings, project meetings, production meetings, weekly meetings. We haven't signed a contract yet. There's correspondence between safety team and myself. We have access to Hammertech for on-boarding plant and equipment. SWMS, approvals SDSs, inductions ect.**

### Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

**We target water suppression. We limit vehicle movements and speed. We have will stop works if there is too much dust, based on visual monitoring by us and client direction. If we see it blowing outside the project boundary then that's too much , we monitoring weather daily. We have three water carts plus tankers running in and out of town, water is sourced from the A1 licences bore which is associated with the A1 property yard in Mudgee.**

Do you believe the site is actively managing this condition effectively? If not why not?

**Best they can. Once they do the burn off, people drive out there and that creates more dust.**

## Chain of Command

How is the interaction with head office and the parent company conveyed?

**Mudgee is the A1 main office. Senior managers come out to site almost every day. There's also daily and weekly catch up for progress meetings. We have collaborative toolboxes with the client where we discuss internal lessons learnt and safety alert. These communications come from Maas Group is the parent company for A1.**

## Position Descriptions

How are the specific systems to each job roles demonstrated?

**The health and safety management plan identifies the roles and responsibilities. We also have our own internal safety management plan that sets our the requirements. These are also communicated in toolbox talks.**

Are each persons roles and responsibilities effectively captured in their position descriptions?

**Yes.**

## Incident Management

What role have you had in incident management?

**Collaborative role. Justin will be the first point of call for the operator. There will be initial investigations stated by Justin. For something major such as a fire we would assist with our water carts. As the sub-contractor we are under the instruction of the principle. We have our own spill kits in every machine and wheelie bin spill kits.**

Do you think effective corrective and preventative actions have been implemented following past incidents?

**We had a burst hydraulic hose at the start of the week. This was reported to PCL and investigated under our systems as well. The operator acted quickly with the spill kit. The incident investigation had an action to conduct a thorough inspection/pre-start. This was conducted today.**



Photo 1

## Risk Management

What do you see as the biggest environmental risk for the site and why?

**dust is the big one for us. Our generation plus the climate. Rain event and water depending on what the site is like.**

What is the biggest challenge the site faces in the future?

**Looking long term with the recyclables 30 years in the future during decommissioning. Truck movements during construction and managing the social impacts.**

## Additional Questions

Additional Question

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# Media summary

LAT:-32.260692 LON:149.594223

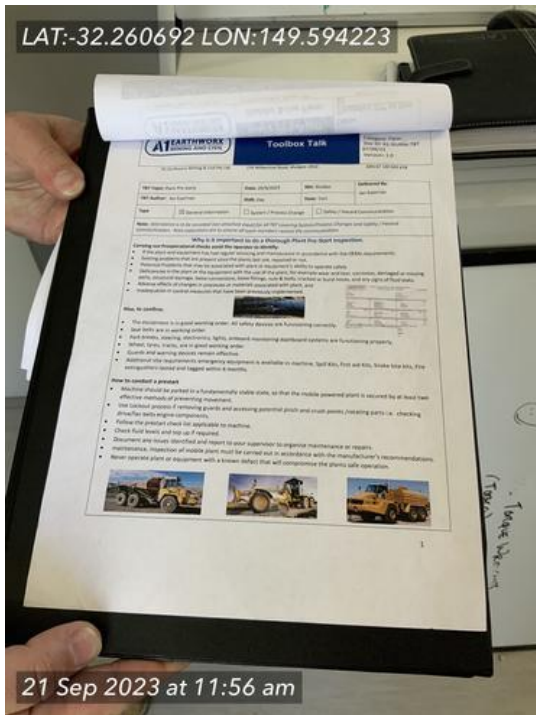


Photo 1



## Stubbo Solar Farm Post-Approval Audit - Staff Interviews

21 Sep 2023 / Shonelle Gleeson-Willey

Complete

Score	0 / 0 (0%)	Flagged items	0	Actions	0
Site conducted				Marked as 'my site is not listed here'	
Conducted on					21.09.2023 09:51 AEST
Prepared by					Shonelle Gleeson-Willey
Location					Stubbo NSW 2852 Australia (-32.26069127973156, 149.59397362994906)

## Inspection

### Staff Interview Introduction

Name of interviewed staff member and list their position description

**Jason Wilby, Construction Manager, Civil and Mechanical**

### Implementation of the Environmental Management Strategy

In your own words describe the intent of the EMS and how it interacts with the other Management Plans and Systems.

**The CEMP is the overarching document. The EMS is our obligations on site and is related to the certificate of construction and DA.**

Do you think the current EMS is effective? Give reasons how and why you believe the Plan is or is not effective.

**Yes I do. The Management Plans are good, I did miss 1 line in a 100 page doc regarding the fish passage. I'm not a qualified enviro and I'm still on a learning curve.**

### General Environmental Principles

Explain the adopted General Environmental Principles

**Yes. Clean site and not damage environment, no pollutants to escape site, no contaminants, be responsible caretakers.**

### Project relationship

Explain the relationship between ACEN, PCL and Transgrid on this project

**ACEN - client. TransGrid - constructor of switch yard. All here to achieve the goal of exporting renewable energy. In a safe and reliable manner.,**

How is communication managed?

**On different levels. POM to PM for commercial. Construction managers to construction managers. I have a good relationship with the 4/5 land owners.**

### Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

**Visually. Water carts. Self managed on-site by site supervisors who call John the water cart driver directly as needed. Call up over the radio.**

Do you believe the site is actively managing this condition effectively? If not why not?

**Yes, we have small work fronts (13 civil planned, currently 2 work fronts and 2 water carts.)**

### Chain of Command

How is the interaction with head office and the parent company conveyed?

Communication goes up through the PCL chain of command. PCL communication flows back from HQ effectively. HQ communicates lessons learnt from other projects and new technology or methodologies to be used. HQ shares learning from other PCL projects during Fireside chats.

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### Position Descriptions

How are the specific systems to each job roles demonstrated?

**We have all rolled from PCL job to PCL job. People bring experience from other similar industries or jobs. PCL have a learning center. They have 10 life saving absolutes, and a full library of educational courses and tools. People are pointed towards specific training for their role.**

---

Are each persons roles and responsibilities effectively captured in their position descriptions?

**Yes. The senior people have very specific PDS the more junior staff are more general and across everything.**

### Incident Management

What role have you had in incident management?

**I get called to a lot of it, investigation recording, I get witness statements, manage the site, coordinate the investigation. Medical needs. For minor incidents I make sure there's appropriate spill kits., I also make sure the training paperwork and site based paperwork is completed. The operator would call the site supervisor, who would call the HSE Supervisor from PCL, who would call the available Construction manager (these two would go to site), Jen or Jeff would fill out the paperwork for incident investigation. HSE team would input into SMC (Safety Management Centre) and a PM name would be associated with it, and there will be a requirement for them to sign off. PMS reporting requirement to send to ACEN. I know its a requirement to report to ACEN but I'm not sure about the timeframes.**

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Do you think effective corrective and preventative actions have been implemented following past incidents?

**Yes definitely. Near miss reporting is reported by all staff. Any near miss is acted upon. We would call A1 and ask them to come straight away to tidy something up.**

### Risk Management

What do you see as the biggest environmental risk for the site and why?

**Very unusual extended weather events.**

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What is the biggest challenge the site faces in the future?

**60 truck movements per day. The supply of components and materials. There's 950,000 modules need to be delivered.**

### Additional Questions

Additional Question

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## Stubbo Solar Farm Post-Approval Audit - Staff Interviews

21 Sep 2023 / Shonelle Gleeson-Willey

Complete

Score	0 / 0 (0%)	Flagged items	0	Actions	0
Site conducted				Marked as 'my site is not listed here'	
Conducted on					21.09.2023 11:37 AEST
Prepared by					Shonelle Gleeson-Willey
Location					(-32.26075738498794, 149.5939253928651)

## Inspection

### Staff Interview Introduction

Name of interviewed staff member and list their position description

**Ian Eastman-HSE Manager  
Justin Edwards-Construction  
Manager**

### Implementation of the Environmental Management Strategy

In your own words describe the intent of the EMS and how it interacts with the other Management Plans and Systems.

**It's integrated into their plan its to protect the environment and sustainability and rehabilitation of the projects lifespans. Protect local fauna and limit the nuisance towards local communities. Limit dust and implemented erosion and sediment controls and comply with legislative requirements.**

Do you think the current EMS is effective? Give reasons how and why you believe the Plan is or is not effective.

**It's early days in the site but from the clients side they do seem to have everything together and are very professional and pro-active.**

### General Environmental Principles

Explain the adopted General Environmental Principles

**It's the first statement I gave. Limit the impact on the environment. Limit impact on local communities.. Manage waste correctly including segregation. Managing dust through dust suppression.**

### Project relationship

Explain the relationship between ACEN, PCL and Transgid on this project

**A1 is probably one step down. PCL is the EPC. TransGrid is their own identity. ACEN is the client. Our line in the chain is direct to PCL. ACEN will put their direction through PCL to us.**

How is communication managed?

**Through the normal process of simop meetings, project meetings, production meetings, weekly meetings. We haven't signed a contract yet. There's correspondence between safety team and myself. We have access to Hammertech for on-boarding plant and equipment. SWMS, approvals SDSs, inductions ect.**

### Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

**We target water suppression. We limit vehicle movements and speed. We have will stop works if there is too much dust, based on visual monitoring by us and client direction. If we see it blowing outside the project boundary then that's too much , we monitoring weather daily. We have three water carts plus tankers running in and out of town, water is sourced from the A1 licences bore which is associated with the A1 property yard in Mudgee.**

Do you believe the site is actively managing this condition effectively? If not why not?

**Best they can. Once they do the burn off, people drive out there and that creates more dust.**

## Chain of Command

How is the interaction with head office and the parent company conveyed?

**Mudgee is the A1 main office. Senior managers come out to site almost every day. There's also daily and weekly catch up for progress meetings. We have collaborative toolboxes with the client where we discuss internal lessons learnt and safety alert. These communications come from Maas Group is the parent company for A1.**

## Position Descriptions

How are the specific systems to each job roles demonstrated?

**The health and safety management plan identifies the roles and responsibilities. We also have our own internal safety management plan that sets our the requirements. These are also communicated in toolbox talks.**

Are each persons roles and responsibilities effectively captured in their position descriptions?

**Yes.**

## Incident Management

What role have you had in incident management?

**Collaborative role. Justin will be the first point of call for the operator. There will be initial investigations stated by Justin. For something major such as a fire we would assist with our water carts. As the sub-contractor we are under the instruction of the principle. We have our own spill kits in every machine and wheelie bin spill kits.**

Do you think effective corrective and preventative actions have been implemented following past incidents?

**We had a burst hydraulic hose at the start of the week. This was reported to PCL and investigated under our systems as well. The operator acted quickly with the spill kit. The incident investigation had an action to conduct a thorough inspection/pre-start. This was conducted today.**



Photo 1

## Risk Management

What do you see as the biggest environmental risk for the site and why?

**dust is the big one for us. Our generation plus the climate. Rain event and water depending on what the site is like.**

What is the biggest challenge the site faces in the future?

**Looking long term with the recyclables 30 years in the future during decommissioning. Truck movements during construction and managing the social impacts.**

## Additional Questions

Additional Question

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# Media summary

LAT:-32.260692 LON:149.594223

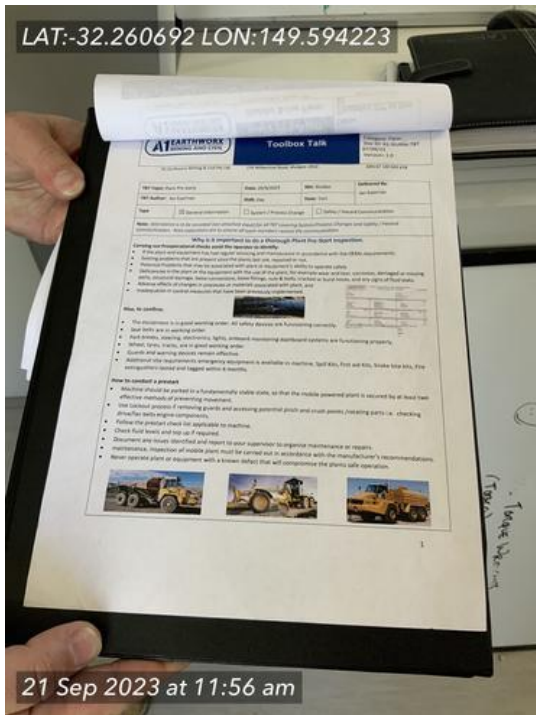


Photo 1



## Stubbo Solar Farm Post-Approval Audit - Staff Interviews

20 Sep 2023 / Shonelle Gleeson-Willey

Complete

Score	0 / 0 (0%)	Flagged items	0	Actions	0
Site conducted				Marked as 'my site is not listed here'	
Conducted on					20.09.2023 15:02 AEST
Prepared by					Shonelle Gleeson-Willey
Location					Stubbo NSW 2852 Australia (-32.26266506483969, 149.5917417972955)

## Inspection

### Staff Interview Introduction

Name of interviewed staff member and list their position description

**Charlie Kemp, Construction Manager Zinfra**

### Implementation of the Environmental Management Strategy

In your own words describe the intent of the EMS and how it interacts with the other Management Plans and Systems.

**Our strategy is the maintain our controls, do regular env inspections then do a pre and post rain event which is all reported through Aspire. We have environmental please who come to site who monitor and make changes to the ErSed Plan.**

Do you think the current EMS is effective? Give reasons how and why you believe the Plan is or is not effective.

**I believe it is.**

### General Environmental Principles

Explain the adopted General Environmental Principles

**No not aware.**

### Project relationship

Explain the relationship between ACEN, PCL and Transgrid on this project

**ACEN is the overall people doing the project. PCL are contracted to ACEN as is Transgrid. And we are contracted to Transgrid.**

How is communication managed?

**Between the three companies we have a weekly meeting where we all discuss what's going one and what might impact on the others on site. Site wise we have a Prestart every morning then Toolbox regularly. I communicative regularly with PCL, mostly Jason and Mark.**

### Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

**Visually monitored. Water cart, dust suppression. We manage the speed of vehicles. We have a 20km/hr sign on the access road into the compound. 20km/hr is also the on-site speed limit.**

Do you believe the site is actively managing this condition effectively? If not why not?

**I believe we are.**

### Chain of Command

How is the interaction with head office and the parent company conveyed?

**We have a site manager for civil. We liaise with Greg Kennan (Transgrid). And Daniel Erwidge (Transgrid) who is a construction manager. We also communicate every few days with the Transgrid PM and Ajit and Rachana Amber (engineer Transgrid). Via phone or meetings. And Teambinder. Zinfra is a part of Jemina the parent company.**

## Position Descriptions

How are the specific systems to each job roles demonstrated?

**In the management plan. Each position is listed and its responsibilities for the project.**

Are each persons roles and responsibilities effectively captured in their position descriptions?

**Yes we all have a PD.**

## Incident Management

What role have you had in incident management?

**On-site I'm the first one to be reported to. Then I report to the Zinfra management and Transgrid. There are very tight reporting timeframes.**

Do you think effective corrective and preventative actions have been implemented following past incidents?

**No incidents to date.**

## Risk Management

What do you see as the biggest environmental risk for the site and why?

**Oil spill from blown hydraulic hose. Because we have a lot of plant and equipment on-site.**

What is the biggest challenge the site faces in the future?

**Time. Completion on-time.**

## Additional Questions

Additional Question





## Stubbo Solar Farm Post-Approval Audit - Staff Interviews

20 Sep 2023 / Shonelle Gleeson-Willey

Complete

Score	0 / 0 (0%)	Flagged items	0	Actions	0
Site conducted				Marked as 'my site is not listed here'	
Conducted on				20.09.2023 14:43 AEST	
Prepared by				Shonelle Gleeson-Willey	
Location				Stubbo NSW 2852 Australia (-32.262668239656435, 149.59173870363736)	

## Inspection

### Staff Interview Introduction

Name of interviewed staff member and list their position description

**Ajit Dhaliwal**

### Implementation of the Environmental Management Strategy

In your own words describe the intent of the EMS and how it interacts with the other Management Plans and Systems.

**The EMS is the proper management of flora fauna, water erosion for the entirety of the solar farm site. Our management plans are taking into consideration our site and how it interacts with the rest of the site.**

Do you think the current EMS is effective? Give reasons how and why you believe the Plan is or is not effective.

**I think it is, we have our weekly meetings. We have coordination meetings with PCL and ACEN to discuss projects progress. It's all about the communication and understanding where there is any deficiencies.**

### General Environmental Principles

Explain the adopted General Environmental Principles

**No I can't. When they first came through I would have read them but now it's about how we manage Zinfra onsite. I am supported by an environmental officer from Transgrid (Cathy Pate) who comes out. Zinfra has their own environmental staff member.**

### Project relationship

Explain the relationship between ACEN, PCL and Transgrid on this project

**ACEN is the client and approval holder, Transgrid has the contract to build and operate the switch yard.**

How is communication managed?

**Several weekly meetings with all stakeholders. Teambinder is used for project correspondence by all contractors and ACEN.**

### Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

**Transgrid/Zinfra runs a water cart.**

Do you believe the site is actively managing this condition effectively? If not why not?

**Yes I believe it is. Today is a very windy day, so we can run more water carts. Today is a worst case scenario.**

### Chain of Command

How is the interaction with head office and the parent company conveyed?

**Monthly reporting to ACEN which captured environmental reporting. There is a coordination meeting scheduled with the management teams of PCL, Zinfra and TransGrid. There's also informal meetings with Zinfra. With ACEN we have an informal weekly catch-up.**

---

### Position Descriptions

How are the specific systems to each job roles demonstrated?

**Everyone has a position description. Responsibility matrix. In project management pla these are both included.**

---

Are each persons roles and responsibilities effectively captured in their position descriptions?

**Yes.**

### Incident Management

What role have you had in incident management?

**First point of contact for any Zinfra incident. Then managing the incident through the Transgrid system. There are timeframe requirements to report to ACEN.**

---

Do you think effective corrective and preventative actions have been implemented following past incidents?

**No incidents to date. Zinfra has had a few audits (Transgrid env, Zinfra env) post mob audit, then regular internal audits.**

### Risk Management

What do you see as the biggest environmental risk for the site and why?

**Dust. Then water bushfire and heat. Then weeds and farms.**

---

What is the biggest challenge the site faces in the future?

**All of the above. This will be an unmanned site during operation. So all the construction related issues will be gone. It reduces.**

### Additional Questions

Additional Question

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## Stubbo Solar Farm Post-Approval Audit - Staff Interviews

20 Sep 2023 / Shonelle Gleeson-Willey

Complete

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Location					Stubbo NSW 2852 Australia (-32.262668239656435, 149.59173870363736)

## Inspection

### Staff Interview Introduction

Name of interviewed staff member and list their position description

**Ajit Dhaliwal**

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In your own words describe the intent of the EMS and how it interacts with the other Management Plans and Systems.

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Do you think the current EMS is effective? Give reasons how and why you believe the Plan is or is not effective.

**I think it is, we have our weekly meetings. We have coordination meetings with PCL and ACEN to discuss projects progress. It's all about the communication and understanding where there is any deficiencies.**

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### Chain of Command

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### Incident Management

What role have you had in incident management?

**First point of contact for any Zinfra incident. Then managing the incident through the Transgrid system. There are timeframe requirements to report to ACEN.**

---

Do you think effective corrective and preventative actions have been implemented following past incidents?

**No incidents to date. Zinfra has had a few audits (Transgrid env, Zinfra env) post mob audit, then regular internal audits.**

### Risk Management

What do you see as the biggest environmental risk for the site and why?

**Dust. Then water bushfire and heat. Then weeds and farms.**

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What is the biggest challenge the site faces in the future?

**All of the above. This will be an unmanned site during operation. So all the construction related issues will be gone. It reduces.**

### Additional Questions

Additional Question

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## DISCLAIMER

This information is to be used only for its intended purpose and should be read in conjunction with the relevant legislation. For more information, contact Moss Environmental Pty Ltd.

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