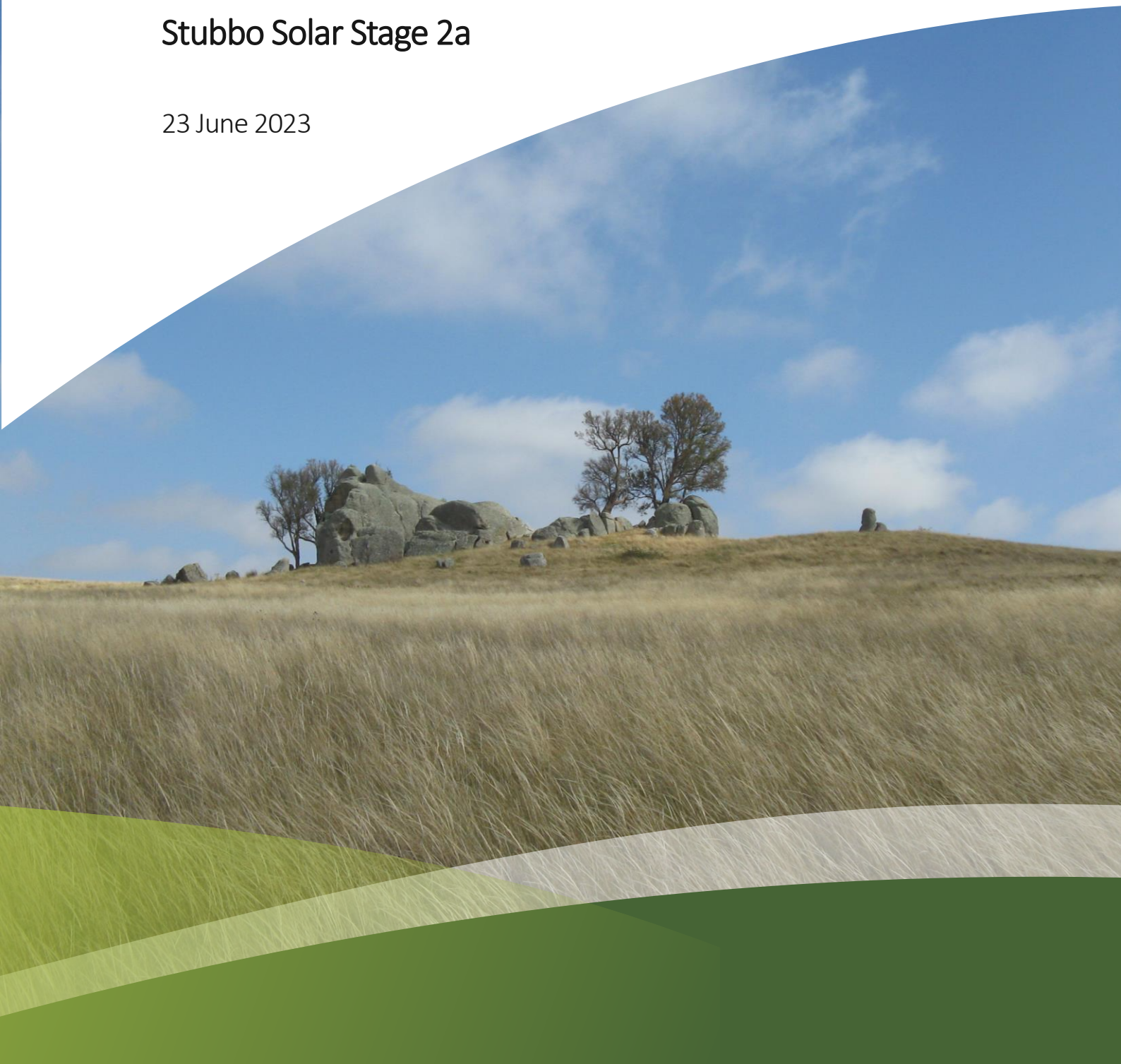
Environmental Management Strategy

Stubbo Solar Stage 2a

23 June 2023



Environmental Management Strategy
Stubbo Solar Stage 2a

AE1229

June 2023

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Issued to			
Michael Yeo, Project Manager – Construction, Stubbo Solar, ACEN Australia Promit Roy, Design & Commissioning Engineer, PCL Constructors Pacific Rim Pty Ltd			
Prepared by		Reviewed by	Approved by
Pratima Koirala, Environmental Scientist, Accent Environmental		Michael Cramer, Director, Accent Environmental	 Michael Cramer, Director, Accent Environmental
Previous versions			
Version:	V1 V2 V3 V4 V5 V6 V7	24 January 2023 23 February 2023 02 March 2023 23 March 2023 16 May 2023 7 June 2023 21 June 2023	Draft to ACEN and PCL Draft to ACEN and PCL Draft to ACEN and PCL Draft to DPE Draft to DPE Draft to DPE Draft to DPE

www.accentenvironmental.com.au info@accentenvironmental.com.au

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Abbreviations

Accent	Accent Environmental Pty Ltd
ACEN	ACEN Australia
BESS	battery energy storage system
BMP	biodiversity management plan
BoP	balance of plant
CoC	condition of consent
DAWE	Department of Agriculture, Water and the Environment (now DCCEEW)
DC	development consent
DCCEEW	Department of Climate Change, Energy, the Environment and Water (formerly DAWE)
DECC	Department of Environment and Climate Change
DGs	dangerous goods
DPE	Department of Planning and Environment
DPIE	Department of Planning, Industry and Environment (now and formerly DPE)
EIS	environmental impact statement
EMP	environmental management plan
EMS	environment management strategy
EPA	Environment Protection Authority
EPC	engineering, procurement and construction
HSE	health, safety and environment
km	kilometre
kV	kilovolt
LGA	local government area
MW	megawatt
MWRC	Mid-Western Regional Council
NEM	National Energy Market
NSW	New South Wales
NSW RFS	NSW Rural Fire Service
PCUs	power conversion units
POEO Act	*Protection of the Environment Operations Act 1997*
Ramboll	Ramboll Australia Pty Ltd
RAP	registered aboriginal party
RtS	response to submissions

SWMP	soil and water management plan
SEPP	state environmental planning policy
SMC	Safety Management Centre
SSD	State Significant Development
TBD	to be determined
TfNSW	Transport for NSW
TMP	traffic management plan
UPC\AC	UPC\AC Renewables Australia Pty Ltd

1 Introduction

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 10 km North of Gulgong and 85 km east of Dubbo in New South Wales (NSW) (Figure 1.1).

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, solar project substation and ancillary operational facilities.

ACEN has also engaged Transgrid to connect the Project to the transmission network used by Transgrid to provide transmission services, which includes certain works that need to be completed by Transgrid to enable Transgrid to connect the Project to the transmission network.

The Development Consent (DC) - Application Number: SSD-10452 – requires the preparation, approval and implementation of an environmental management strategy (EMS) and a number of management plans for both the construction and operation phases of the project. The DC is attached as Appendix A. Commitments were also made by ACEN in the environmental impact statement (EIS), the response to submissions (RtS) report and the Amendment report for inclusion in the management plans.

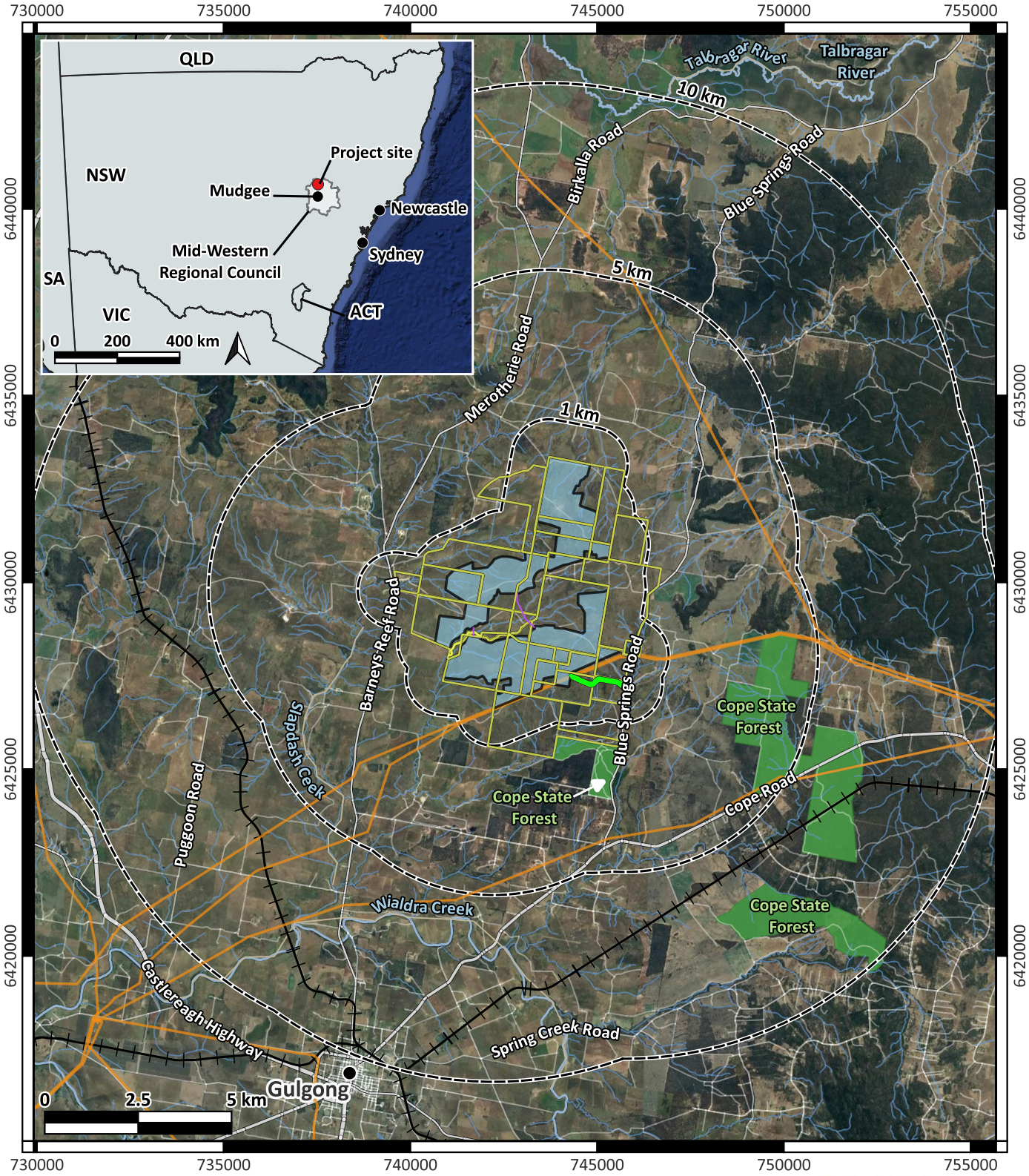
On 29 June 2021, the Executive Director, Energy, Resources and Industry Assessments granted consent to the development application for the Stubbo Solar Farm subject to conditions, under delegation from the Minister for Planning and Public Spaces and section 4.38 of the *Environmental Planning and Assessment Act 1979* (the Act).

In a letter dated 24 August 2022, the Secretary approved the Applicant's proposal to develop the project in two stages, comprising:

- Stage 1: Road upgrades including construction of the main site access; and
- Stage 2: Construction of the solar farm.

In a subsequent letter dated 10 May 2023, the Secretary approved the Applicant's request dated 8 May 2023 seeking the Planning Secretary's approval to revise the staging of the Stubbo Solar Project under Condition 3 of Schedule 4 of SSD-10452, and to develop the project in four stages comprising:

- Stage 1: Road upgrades (Blue Springs Road) and construction of the main site access.
- 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.



- Access road, project Stage 1
- Existing transmission line
- Road
- Main watercourse
- Watercourse - tributary
- Project lot boundary
- Solar array extent
- Proposed access corridor
- State Forest
- Radius (1, 5, and 10 km) from project site

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Accent 1129 Stubbo Solar project

Figure 1.1. Site locality

Created 24/03/2022

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Scale: 1:150,000 at A4

Page size: A4

Base map: Google Satellite [Mar 2023]
Additional data: NSW RoadSegment, NSW Hydroline, NSW_Six_Mid_Western_Cadastral_data, NSW ElectricityTransmissionLine

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- 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 has engaged Accent Environmental Pty Ltd (Accent) to prepare this EMS for Stage 2a of Stubbo Solar, as approved by the Planning Secretary in the letter dated 10 May 2023.

1.1 Purpose and scope of this document

The purpose of this EMS is to provide an overarching framework for the management of environmental issues during the Stage 2a construction of the Stubbo Solar project. The relationship between this EMS and the environmental management plans and subplans required for the construction of the project are shown diagrammatically in Figure 1.2.

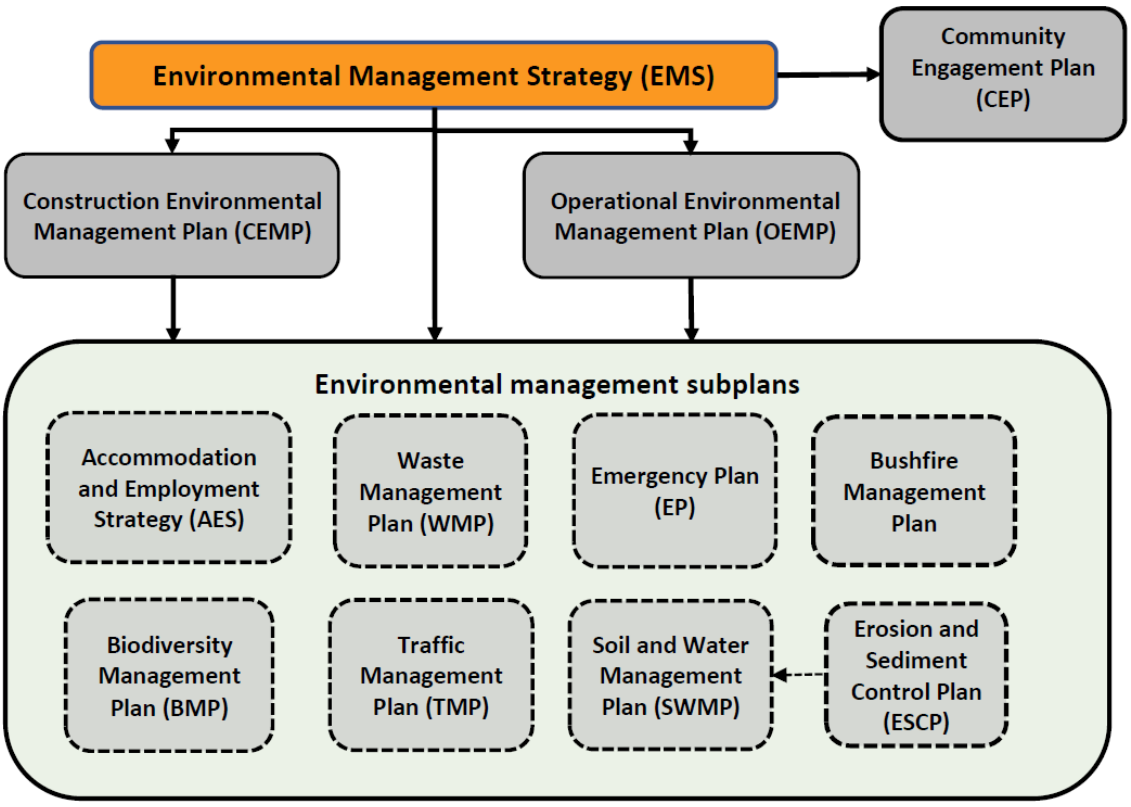


Figure 1.2 Schematic of environmental management documentation

The EMS covers the construction works to be undertaken by PCL and Transgrid as described in Section 3.1 of the solar project. It excludes construction works that were undertaken in relation to the External Road Upgrades which are associated with Stage 1 and are not the responsibility of PCL or Transgrid.

ACEN is the Proponent and ultimately takes responsibility for compliance with SSD-10452. This responsibility is reflected in the management plans, programs and strategies developed for the project.

As both PCL and Transgrid have been contracted by ACEN to undertake construction of the Stubbo Solar Project, the PCL and Transgrid adopted environmental and related

policies/standards will comply with, and where possible exceed, the minimum standards set by ACEN in this EMS.

1.2 Project overview

The Stubbo Solar project will generate energy through the conversion of solar radiation to electricity via photovoltaic (PV) modules (solar panels). The solar panels will generate direct current electricity that will be inverted to AC electricity via the use of power conversion units. The electricity output from the project will then be supplied to an existing 330 kilovolt (kV) transmission line (Line 79) operated by Transgrid.

1.3 Project objectives

ACEN has established a number of objectives for the project which take into account factors such as contribution to community, the environment and safety. These objectives include the following of particular relevance to this EMS and the environmental management plans that sit below it:

- zero injuries or environmental harm during construction and operation of the works
- design for the safety of people, livestock, fauna and flora, and the environment throughout the life of the solar project in accordance with good industry practices
- mutually beneficial relationships with host communities, First Nations and other stakeholders are in place throughout the life of the project
- 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
- minimise adverse social and environmental impacts on the local community and environment
- allow for future grazing, by sheep, within the solar project (post construction phase)
- contribute to Australia's transition to a clean energy future.

In accordance with CoC 1 (Schedule 2) of the DC, in meeting the specific environmental performance criteria established under the DC, PCL and Transgrid will implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development (as relevant).

1.4 Strategic framework for environmental management

The EMS provides the means by which PCL and Transgrid can manage project-related environmental risks. It achieves this by outlining the framework for:

- clearly setting out PCL and Transgrid's environmental management obligations and the means by which they will be managed, implemented, monitored and reviewed

- systematically tracking and documenting compliance with DC Conditions of Consent (CoCs), EIS commitments, RtS report commitments, Amendment report commitments, external regulatory requirements and internal policy obligations
- effectively communicating with external and internal stakeholders, including ACEN, regulators, the community, subcontractors and company personnel to achieve a high level of environmental management and ongoing, continuous improvement.

1.5 Project staging

In accordance with CoC 3 (Schedule 4) of the DC, ACEN has sought the Planning Secretary's discretion to stage the development of the Stubbo Solar project as approved by the Planning Secretary in the letter dated 10 May 2023.

2 Statutory requirements

In accordance with CoC 2 (Schedule 2) of the DC, the Applicant will carry out the development:

- generally in accordance with the EIS; and
- in accordance with the conditions of this consent.

In accordance with CoC 3 (Schedule 2), 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.

2.1 Conditions of consent

The CoCs from Schedule 2, Schedule 3 and Schedule 4 of the DC are listed in Table B1 in Appendix B. A cross-reference is provided to the documentation in which they are addressed.

Schedule 4 (CoC 1) requires an EMS to be developed to the satisfaction of the NSW Planning Secretary. This EMS has been prepared in accordance with this requirement.

2.2 Commitments in EIS and associated documentation

The EIS was prepared by Ramboll (2020). The commitments in the EIS include the relevant management and mitigation measures set out in Table 20-1 of the main EIS report and Section 7 of the Amendment Report (Ramboll 2021b).

The combined commitments in the EIS and the Amendment report are listed in Appendix C. The commitments in the RtS report are listed in Appendix D. In addition there are a number of post-approval documents comprising correspondence between ACEN (then UPC Renewables Australia), DPE and Council that have bearing on the approvals and management of the project. These documents included the staging request letter and DPE acceptance (see Section 1.5).

2.3 Legislation and planning documents

Relevant legislation and planning documents relevant to the Stubbo Solar project are referenced where appropriate throughout the EMS and in the supporting management plans. The legislation and planning documents are also presented as a consolidated list in Appendix E.

PCL and Transgrid will maintain a register of relevant environmental laws, both state and federal, and ensure that the register is kept up to date.

2.4 Guidelines and standards

The main guidelines and standards relevant to the environmental management of the Stubbo Solar project are listed in Appendix F.

3 Project description

3.1 Project works

3.1.1 Stage 2a works

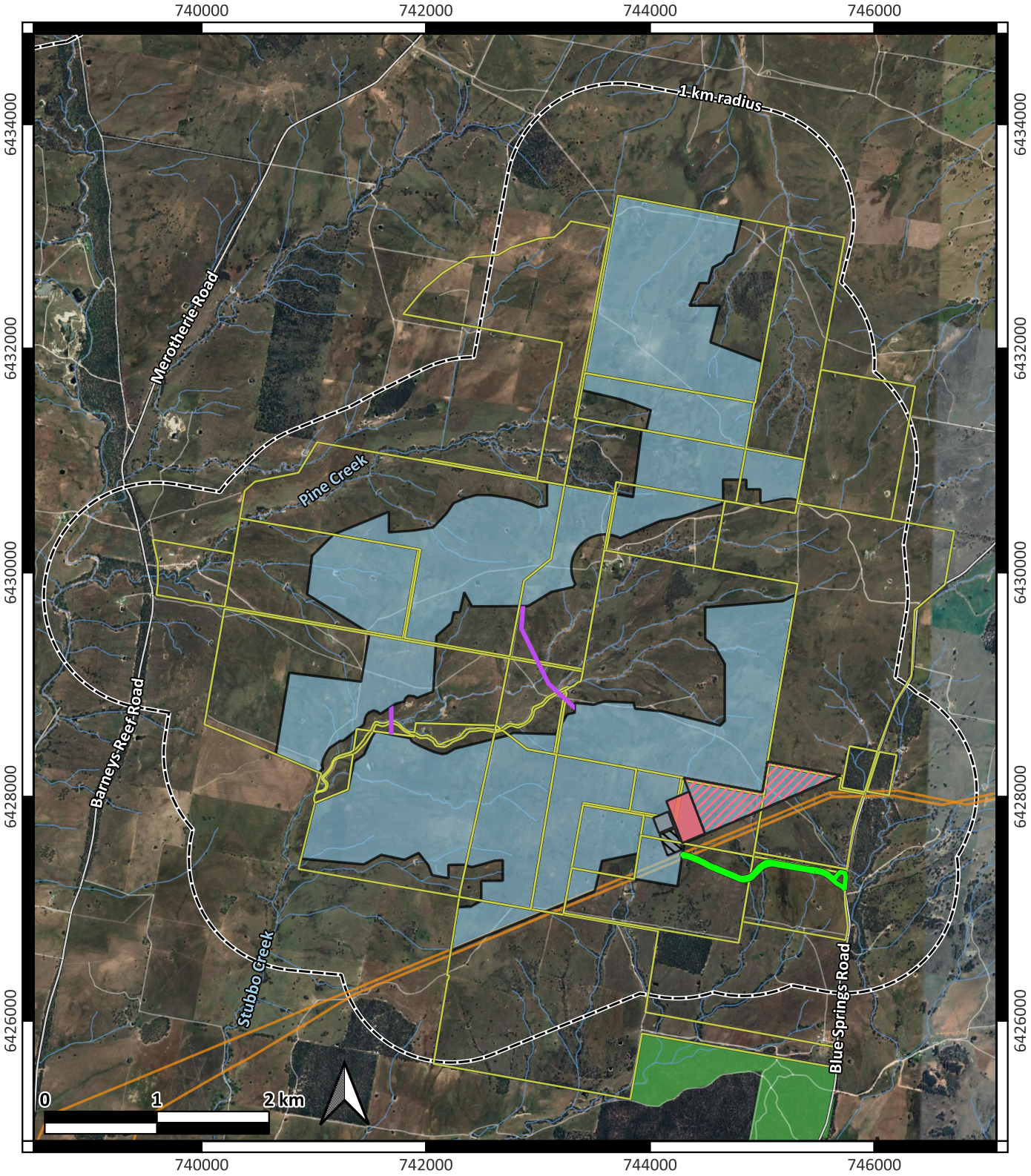
Key activities for Stage 2a include:

- site compound
- fencing works, including security fencing
- access roads including drainage and rehabilitation
- solar arrays that include:
  - general site wide cut to fill earthworks
  - piling installation
  - tracker installation
  - above ground and below ground cable installation and termination
  - module installation
- substation, switchyard and control buildings works that includes:
  - earthworks
  - structures and Footings
  - gantries and HV switchgear
  - transformer installation and connection (Substation only)
  - control building installations (both Substation and Switchyard)
- operations & maintenance building, including warehouse facility
- cold Commissioning works
- hot commissioning works including hold point testing for compliance to AEMO requirements
- site wide rehabilitation
- all other associated infrastructure.

3.1.2 PCL works

The works to be managed by PCL will convert energy from solar radiation into electrical energy to be fed into the electricity grid. The site configuration is shown in Figure 3.1. A series of PV Modules mounted on a horizontal single-axis tracking (Tracker) structure will convert solar radiation into direct current electrical energy which will be fed into power conversion units (PCUs). Using inverters and step-up transformers, the PCUs will convert the direct current electrical energy into alternating current electrical energy at an optimised reticulation voltage, envisaged by ACEN to be a Medium Voltage such as 33 kV.

The high voltage (HV) works will step up the voltage to 330 kV and connect the Solar project to the Connection Assets (see Section 3.1.3, below).



- Access road, project Stage 1
- Existing transmission line
- Road
- Main watercourse
- Watercourse, tributary
- Project lot boundary
- Substation (Transgrid)
- BESS
- Switchyard
- Laydown area
- Solar array extent
- Proposed access corridor
- State Forest
- 1 km radius from project site

Accent 1129 Stubbo Solar project

Figure 3.1. Site configuration

Created 24/3/2023

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Scale: 1:50,000 at A4

Page size: A4

Base map: Google Satellite [Mar 2023]

Additional data: NSW RoadSegment, NSW Hydroline, NSW_Six_Mid_Western_Cadastral_data, NSW ElectricityTransmissionLine

ACCENT ENVIRONMENTAL

PCL's design and all activities (on Site or otherwise) will be undertaken in such a manner as to not hinder, cause conflict, or create additional work for the future development.

External road upgrade works were required in support of the project. These External Road Upgrades comprised an upgrade of the main site access road (Blue Springs Road) and construction of the main site access. The External Road Upgrades are to be completed by others and are not the responsibility of PCL or Transgrid or covered in this plan.

PCL's works are to be designed to minimise the land required to achieve the rated electrical output as defined in the Development Consent.

3.1.3 Transgrid works

ACEN has engaged Transgrid to connect the Project to the transmission network used by Transgrid to provide transmission services, which includes certain works that need to be completed by Transgrid to enable Transgrid to connect the Project to its transmission network.

3.2 Project schedule

The proposed construction schedule for Stage 2a is summarised in **Error! Not a valid bookmark self-reference.**. Construction will be undertaken in three overlapping sections:

- Section 1 comprises construction of the Connection Assets by Transgrid and a substation build by PCL
- Section 2 comprises the construction of the first area of solar arrays by PCL
- Section 3 comprises the construction of the second area of solar arrays by PCL.

Construction will be followed by validation testing and a project closeout period.

Table 3.1 Stage 2a construction schedule

Activity	Start	Finish
Public Road Upgrades Completion by Local Council	-	11-May-23
Section 1		
Switchyard Construction (Transgrid) – Notice to Proceed	21-Oct-22	21-Oct-22
Substation Construction – Civil and Electrical Works	24-May-23	7-May-24
Section 2 (Generating System #1)		
Material Procurement	22-Dec-22	26-Feb-24
Civil Works	15-May-23	27-Sep-24
Solar Array Construction	4-Jul-23	27-Sep-24
Section 3 (Generating System #2)		
Material Procurement	22-Dec-22	22-Apr-24

Activity	Start	Finish
Civil Works	15-May-23	07-Nov-24
Solar Array Construction	11-Jul-23	07-Nov-24
R2 Validation Testing		
Section 2 Generating System #1	26-Jun-24	06-Jan-25
Section 3 Generating System #2	26-Jun-24	19-Mar-25
Practical Completion		
Practical Completion - All Sections	-	06-May-25

3.3 Hours of operation

In accordance with CoC 16 (Schedule 3) of the DC, unless ACEN and the applicable authority agree otherwise, PCL and Transgrid will comply with the hours outlined in Table 3.2.

As per CoC 16, 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.

Table 3.2 Hours of operation

Day	Normal working hours
Monday to Friday	7:00 am - 6:00 pm
Saturday	8:00 am - 1:00 pm
Sundays	at no time on Sundays
NSW public holidays	at no time on NSW public holidays

4 EMS structure

The EMS is supported by a range of specific management plans that address project impacts on potentially affected aspects of the environment. Whereas the management plans are 'live' documents that should be updated between project phases (e.g. from construction to operations) or in response to changing circumstances (e.g. design modifications or specific environmental issues that arise), the EMS is a strategic document that sets out the context and legislative framework and describes the overarching management system, procedures and protocols that apply to all plans.

The management plans and subplans that fall under the EMS, as shown in Figure 1.2, are described briefly below.

4.1 Construction Environmental Management Plan

As outlined in the EIS, the management of environmental impact during construction is documented in a Construction Environmental Management Plan (CEMP), which forms part of the EMS (Ramboll 2020).

The CEMP sets out the framework for environmental management to enable PCL and Transgrid to meet their environmental obligations and, along with its subcontractors, to implement environmental management best practices to identify, manage and mitigate environmental impacts during the works.

A number of subplans support the CEMP as outlined in Section 4.2, below. In addition, the CEMP includes sections covering the management of the following environmental aspects:

- land
- noise and vibration
- air quality and dust
- visual environment
- lighting
- dangerous goods
- socio-economic environment.

4.2 CEMP subplans

In accordance with the requirements of Schedule 3 of the DC, the following subplans to the CEMP have been prepared for the construction phase of the project (see Figure 1.2):

- Traffic Management Plan (TMP) – CoC 11
- Biodiversity Management Plan (BMP) – CoC 15
- Heritage Management Plan (HMP) – CoC 23
- Soil and Water Management Plan (SWMP) – CoC 27
- Emergency Plan (EP) – CoC 31
- Accommodation and Employment Strategy (AES) – CoC 33.

To meet the additional requirements of the EIS:

- the SWMP includes an Erosion and Sediment Control Plan (ESCP)
- a Bushfire Management Plan (in the form of a Bushfire Emergency Management & Operations Plan – BEMOP) has been prepared
- a Waste Management Plan (WMP) has been prepared
- a Community Engagement Plan (CEP) has been prepared as a separate supporting document.

5 Environmental management framework

ACEN, PCL and Transgrid will strive for excellence through their commitment to leading practice in environmental management and performance. Implementation of this EMS will assist in minimising the adverse environmental impacts of construction-related activities (and maximising project benefits) by setting out a comprehensive framework for environmental management, mitigation, monitoring and review.

This EMS, in combination with the management plans and subplans that fall under it (see Figure 1.2), outlines the minimum standard to ensure that ACEN, contractors (PCL and Transgrid) and subcontractors manage the environmental aspects and impacts of the project in a manner that is planned, controlled, monitored, recorded and audited, using a management system that drives continual improvement.

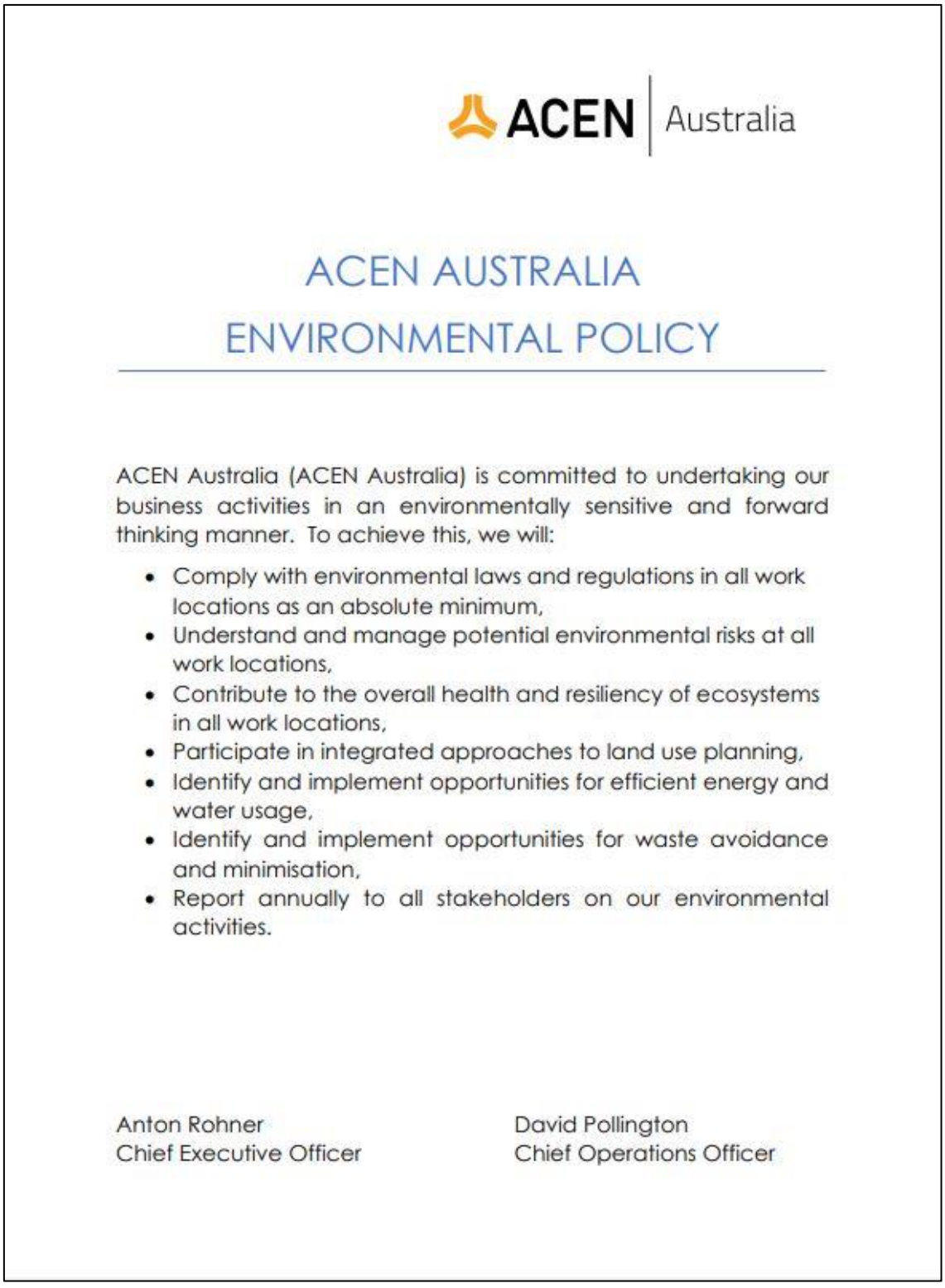
5.1 Environmental and related policies

PCL and Transgrid have adopted environmental and related policies which set out their environmental management and other relevant aims, objectives and values. Figures 5.1 to 5.5 show ACEN's environmental and community relations policies, PCL's HSE and environmental policy statements and Transgrid's environmental policy, respectively.

5.2 General environmental principles

The general environmental principles to be adopted by PCL and Transgrid for the proposed works are:

- complying with statutory requirements (CoCs and legislation)
- minimising impacts on the community and environment
- the timely and efficient response to any environmental incidents and complaints
- rehabilitation of all disturbed land
- continual monitoring, review and reporting on the environmental impacts of the works.



ACEN Australia

ACEN AUSTRALIA
ENVIRONMENTAL POLICY

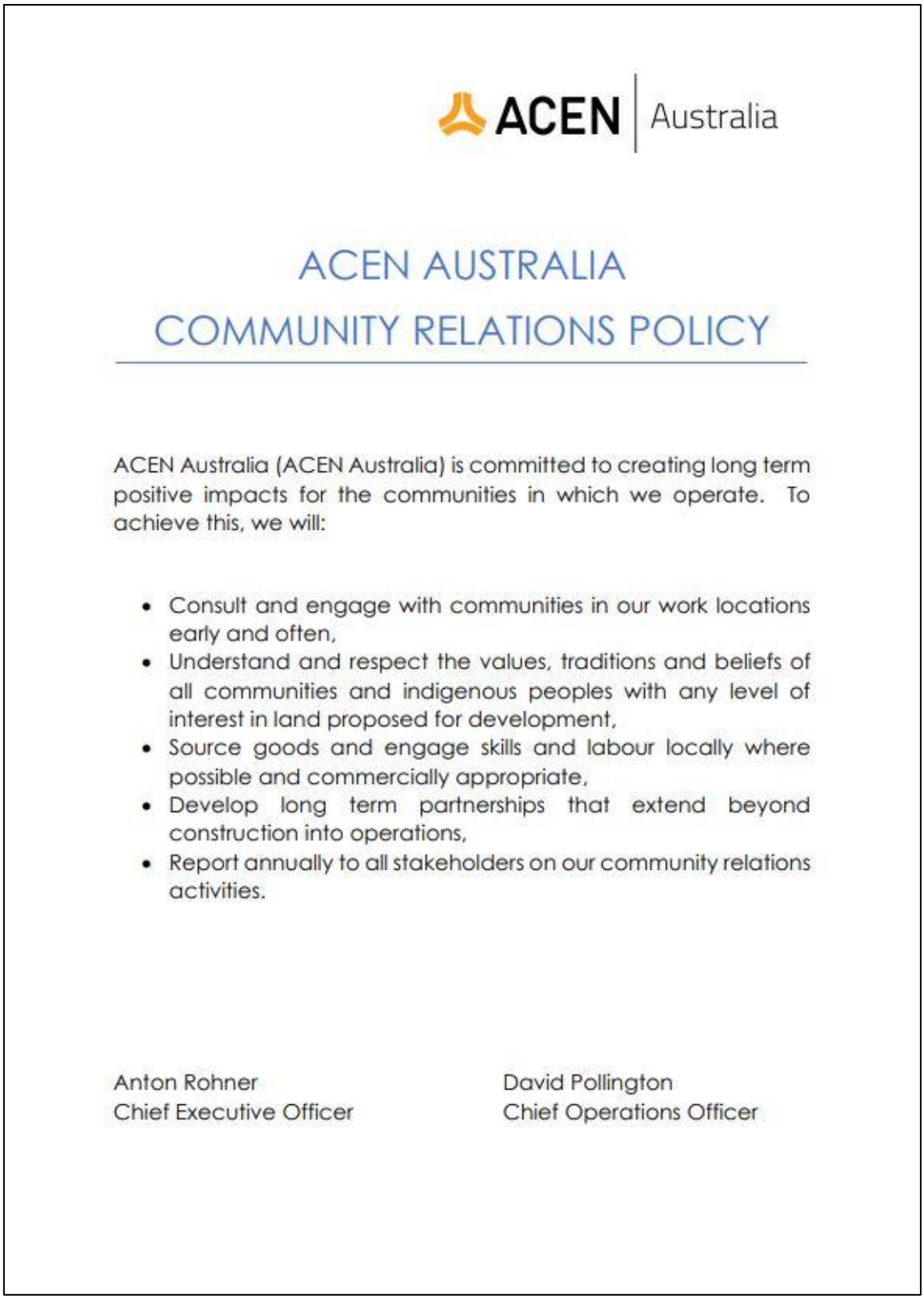
ACEN Australia (ACEN Australia) is committed to undertaking our business activities in an environmentally sensitive and forward thinking manner. To achieve this, we will:

- Comply with environmental laws and regulations in all work locations as an absolute minimum,
- Understand and manage potential environmental risks at all work locations,
- Contribute to the overall health and resiliency of ecosystems in all work locations,
- Participate in integrated approaches to land use planning,
- Identify and implement opportunities for efficient energy and water usage,
- Identify and implement opportunities for waste avoidance and minimisation,
- Report annually to all stakeholders on our environmental activities.

Anton Rohner
Chief Executive Officer

David Pollington
Chief Operations Officer

Figure 5.1 ACEN Environmental Policy



ACEN Australia

ACEN AUSTRALIA
COMMUNITY RELATIONS POLICY

ACEN Australia (ACEN Australia) is committed to creating long term positive impacts for the communities in which we operate. To achieve this, we will:

- Consult and engage with communities in our work locations early and often,
- Understand and respect the values, traditions and beliefs of all communities and indigenous peoples with any level of interest in land proposed for development,
- Source goods and engage skills and labour locally where possible and commercially appropriate,
- Develop long term partnerships that extend beyond construction into operations,
- Report annually to all stakeholders on our community relations activities.

Anton Rohner
Chief Executive Officer

David Pollington
Chief Operations Officer

Figure 5.2 Community Relations Policy

PCL
CONSTRUCTION

PCL CONSTRUCTORS PACIFIC RIM PTY LTD

Health, Safety and Environment
POLICY STATEMENT

PCL Constructors Pacific Rim Pty Ltd is committed to providing and maintaining a safe work environment.

We achieve this goal by providing a system of policies, procedures, and practices that encourage continuous improvement of all HSE program elements and the site-specific HSE plan.

It is every employee's and trade contractors' responsibility to manage risks in the workplace and contribute to PCL's health and safety objectives. As an employee or trade contractor, at all times you must guard your safety and the safety of fellow personnel by identifying, controlling and/or eliminating known hazards that can result in personal injury or illness, equipment and property damage, or any other form of controllable loss.

All employees and trade contractors must promptly report incidents, unsafe acts or conditions and supervisors are responsible for taking immediate action on issues that arise.

PCL shall achieve the abovementioned objectives by:

- Control and minimize workplace health and safety hazards;
- Providing education and training to PCL employees;
- Provide induction to all trade contractors;
- Establishing meaningful health and safety and targets with the aim of continual improvement of our WHS performance;
- Facilitating ongoing consultation and participation of workers, and where applicable, workers representatives in the management of health and safety;
- Periodically reviewing the effectiveness of our management system;
- Complying with the applicable statutory and industry obligations; and
- Require all vendors and trade contractors comply with PCL systems and standards.

Fostering a safety culture requires the dedication, commitment, involvement, and participation of all employees and trade contractors. Working together will allow us to achieve safety excellence.

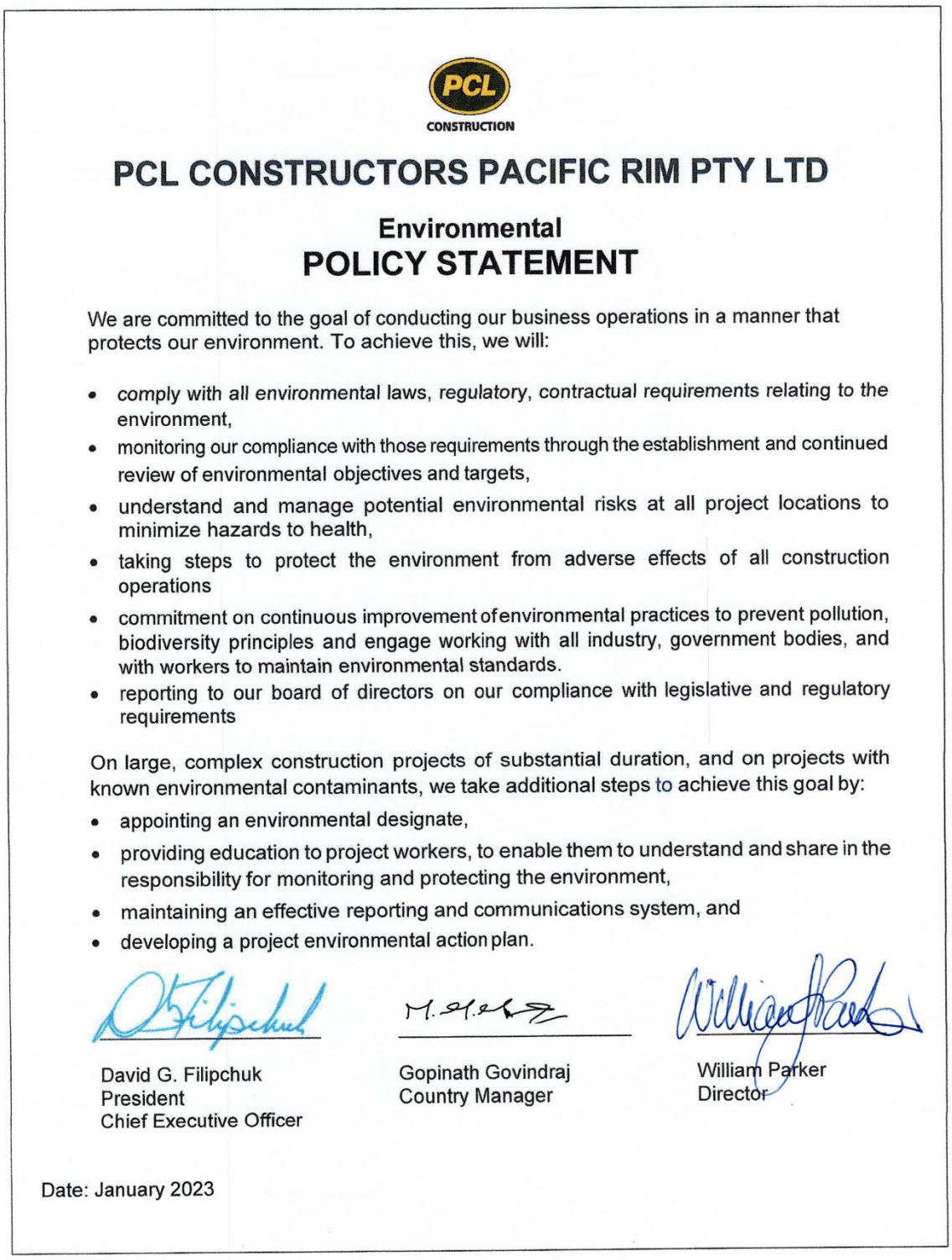
David G. Filipchuk
President
Chief Executive Officer

Gopinath Govindraj
Country Manager

William Parker
Director

Date: January 2023

Figure 5.3 PCL Health, Safety and Environment Policy Statement



PCL CONSTRUCTION

PCL CONSTRUCTORS PACIFIC RIM PTY LTD

Environmental
POLICY STATEMENT

We are committed to the goal of conducting our business operations in a manner that protects our environment. To achieve this, we will:

- comply with all environmental laws, regulatory, contractual requirements relating to the environment,
- monitoring our compliance with those requirements through the establishment and continued review of environmental objectives and targets,
- understand and manage potential environmental risks at all project locations to minimize hazards to health,
- taking steps to protect the environment from adverse effects of all construction operations
- commitment on continuous improvement of environmental practices to prevent pollution, biodiversity principles and engage working with all industry, government bodies, and with workers to maintain environmental standards.
- reporting to our board of directors on our compliance with legislative and regulatory requirements

On large, complex construction projects of substantial duration, and on projects with known environmental contaminants, we take additional steps to achieve this goal by:

- appointing an environmental designate,
- providing education to project workers, to enable them to understand and share in the responsibility for monitoring and protecting the environment,
- maintaining an effective reporting and communications system, and
- developing a project environmental action plan.

David G. Filipchuk
President
Chief Executive Officer

Gopinath Govindraj
Country Manager

William Parker
Director

Date: January 2023

Figure 5.4 PCL Environmental Policy Statement

Environment Policy

Transgrid is committed to conducting its activities and services in a manner that protects the environment, prevents pollution and meets compliance obligations. Transgrid implores all employees and contractors to stop and consider the potential impact to the environment from their activities.

The Environment Policy covers all activities and services undertaken by Transgrid including the planning, building and operation of infrastructure, ongoing management of these assets and their decommissioning.

We aim to enhance our systems and processes in a manner that promotes continuous improvement in environmental management and which will lead to the achievement of good industry practice.

In meeting these commitments, Transgrid:

- Maintains an Environmental Management System that provides the framework for setting and reviewing our environmental objectives and targets, including the implementation, monitoring and review of these objectives and targets, as well as facilitating continuous improvement in environmental performance
- Continues to develop systems that recognise sensitive environmental and cultural sites on or near our infrastructure, and provides processes to manage our activities with the aim of preventing environmental harm or adversely impacting the environment
- Integrates environmental management considerations into the planning, design, siting, construction, maintenance, operation, decommissioning and disposal of all Transgrid assets
- Provides environmental training, assessment and authorisation under our Environmental Management System to employees and contractors to enable them to perform their duties in an environmentally sensitive manner
- Engages with the community, customers, employees, government and other stakeholders regarding potential environmental or cultural impacts associated with our plans and activities
- Pursues opportunities to maximise resource efficiencies and reduce the generation of waste through reduction, reuse and recycling programs
- Identifies, sets and monitors realistic environmental performance measures and communicates them to all employees and stakeholders.

Approved by: Brett Redman, CEO, February 2022

Transgrid

Figure 5.5 Transgrid Environmental Policy

5.3 Key stakeholders

The stakeholders in the Stubbo Solar project include regulators, project stakeholders and community stakeholders. Table 5.1 lists the key stakeholders.

Table 5.1 Key stakeholders

Regulators	Project stakeholders	Community stakeholders
• DPE • Mid-Western Regional Council • NSW Rural Fire Service (NSW RFS) • Department of Climate Change, Energy, the Environment and Water (DCCEEW) (Commonwealth) • Transport for NSW (TfNSW) • SafeWork NSW • Forestry Corporation of NSW • EPA • Essential Energy	• ACEN • PCL • Transgrid • Balance of Plant (BoP) Civil Contractor • BoP Mechanical Contractor • BoP Electrical Contractor • Operations and Maintenance (O&M) Contractor • Specialist subcontractors • Specialist consultants • Transport and logistics companies • Project financiers/ investors • Robson Civil (access road construction contractor) • Mid-Western Regional Council (Blue Springs Road upgrade contractor)	• Leaseholders • Other neighbours • Local business owners • Local employers • Local suppliers • Local employees • Local accommodation providers • Registered Aboriginal Parties (RAPs)

5.4 Project organisational structure

Knowledge of the organisational structure of the project is important when it comes to understanding the roles and responsibilities of the various project stakeholders.

Figure 5.6 is a schematic showing the organisational relationship between ACEN as project proponent, PCL as EPC contractor, PCL's balance-of-plant (BoP) subcontractors, and Transgrid as the contractor for the connection to the transmission network. The lead project managers from ACEN, PCL and Transgrid will hold monthly coordination meetings to discuss project progress and any issues.

The figure also shows the contractors for the Stage 1 road construction works. The access road up to the project site boundary was directly managed by ACEN.

Figures 5.7 to 5.9 show the organisational structure of the ACEN Australia, PCL and Transgrid management teams, respectively.

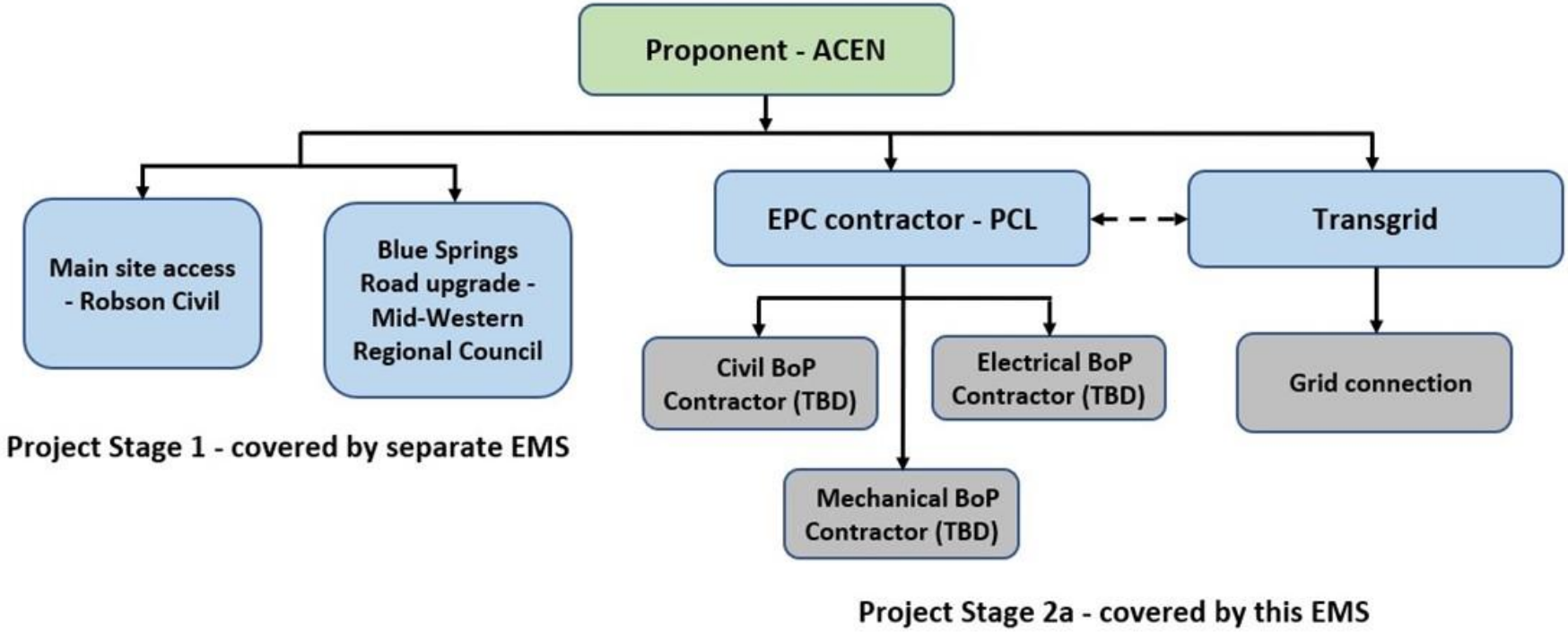


Figure 5.6 Project organisational structure

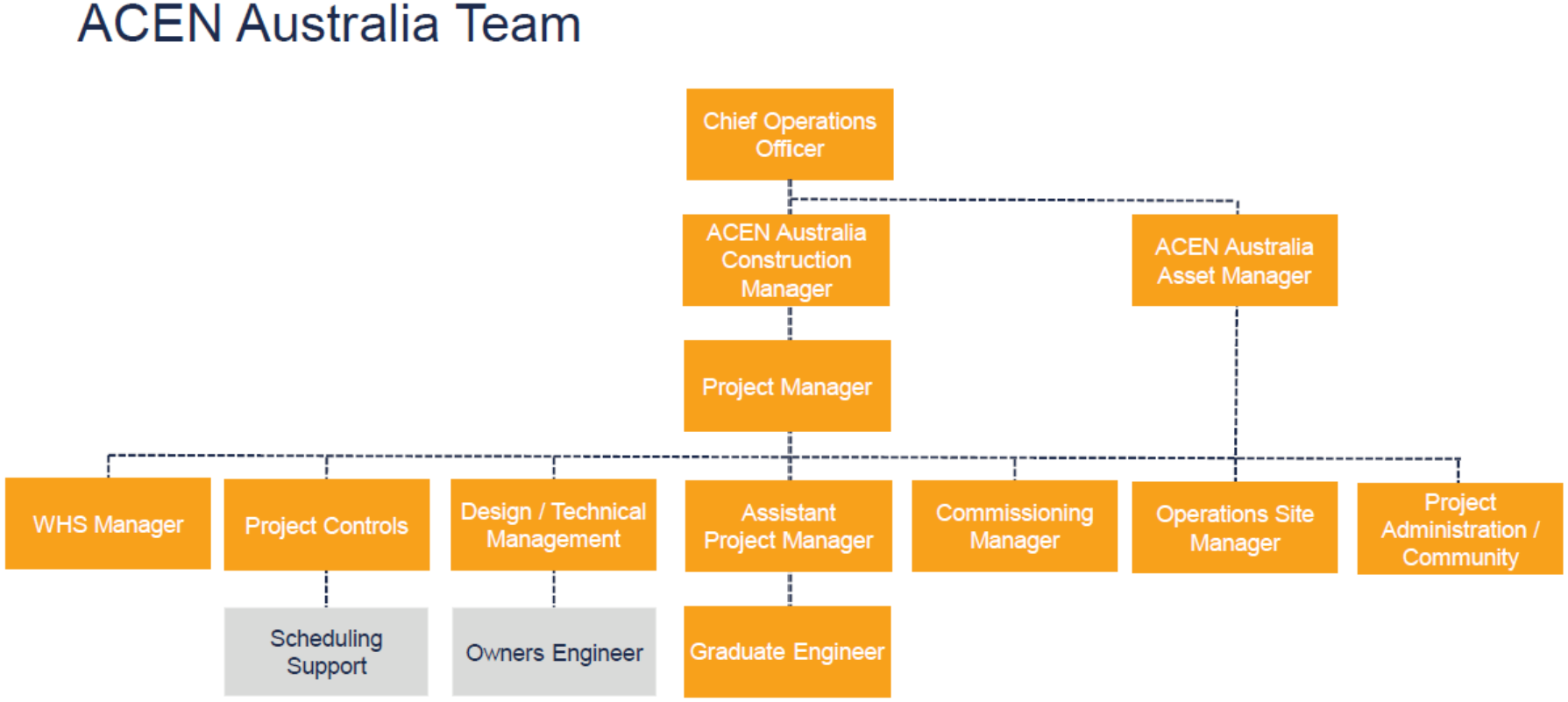


Figure 5.7 ACEN Australia project team organisation chart

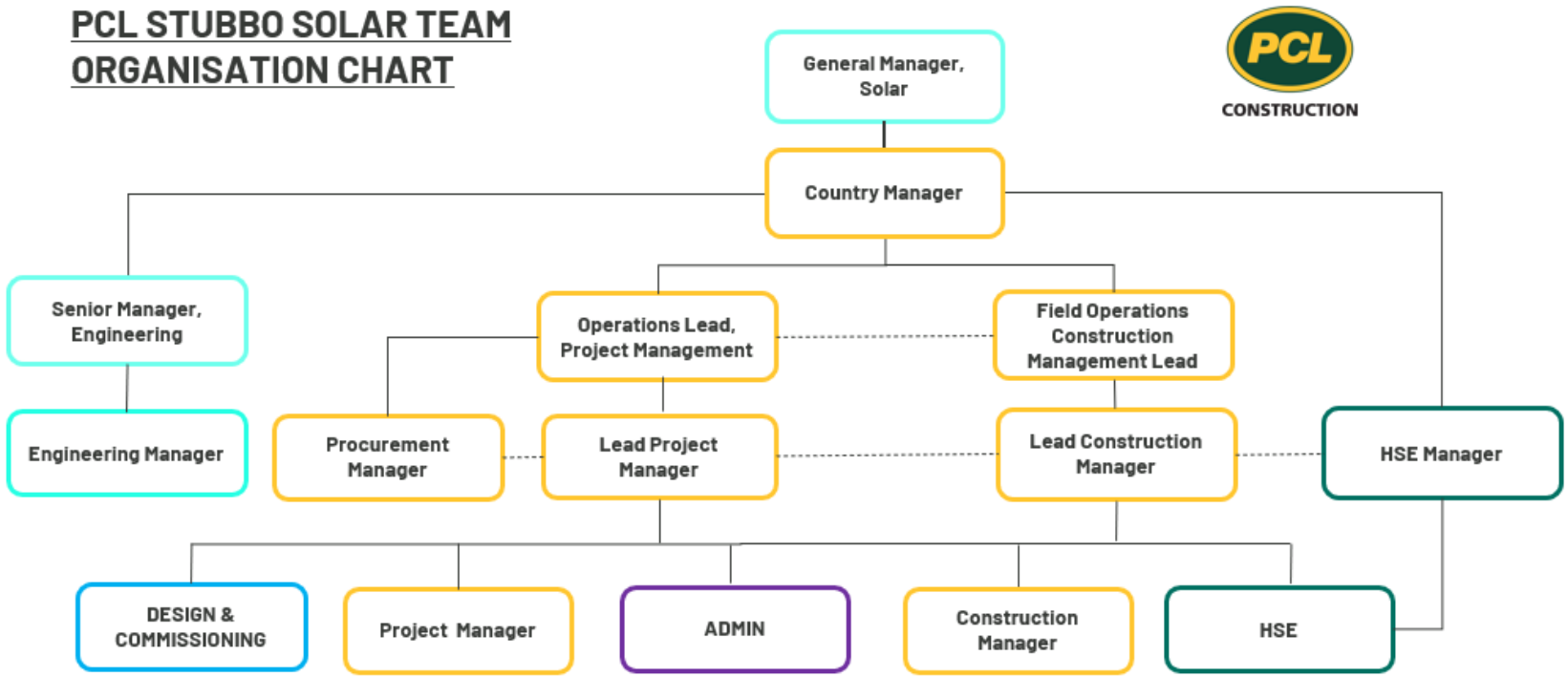


Figure 5.8 PCL project team organisation chart

Transgrid Project Team

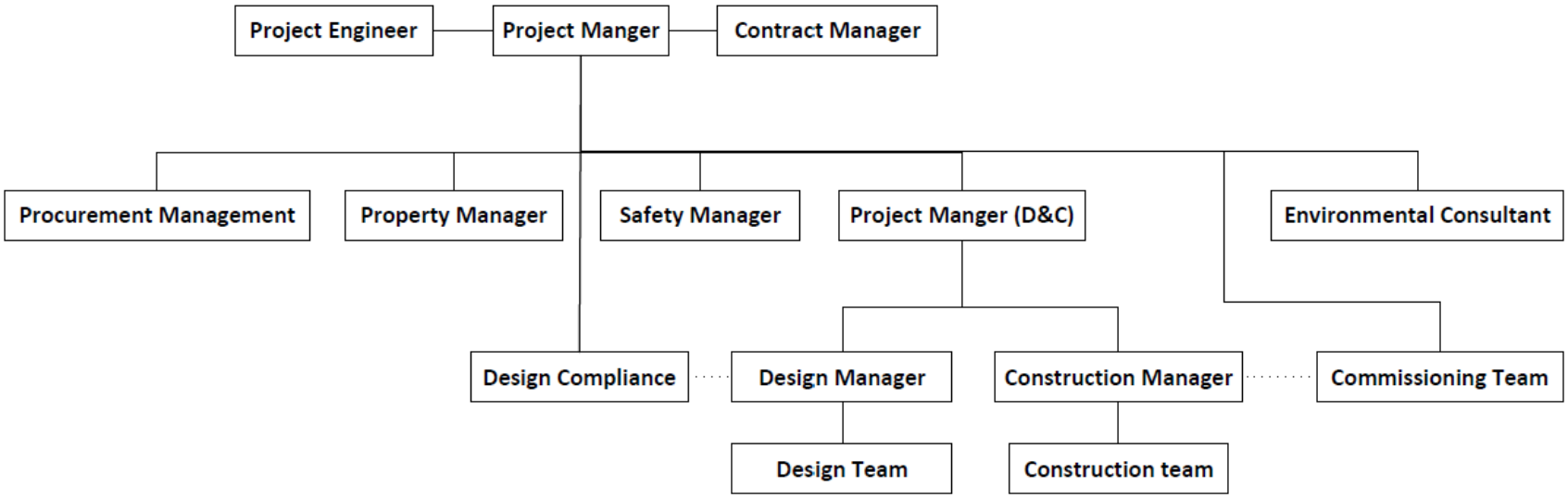


Figure 5.9 Transgrid project team organisation chart

5.4.1 Applicant (Project Proponent)

ACEN, formerly known as UPC\AC Renewables Pty Ltd is the Stubbo Solar project applicant and the proponent of the project. Both PCL and Transgrid work under ACEN as separate entities. All communication occurs via ACEN.

5.4.2 EPC Contractor

ACEN has engaged PCL Constructors Pacific Rim Pty Ltd (PCL) as the EPC contractor to undertake the works described in Section 3.1.2.

As the EPC contractor for the solar project, PCL will design, procure, construct and commission the Stubbo Solar project for ACEN.

5.4.3 BoP Contractors

PCL will engage civil, electrical and mechanical BoP contractors to assist with the delivery of the works.

5.4.4 Substation construction contractor

ACEN has engaged Transgrid to connect the Project to the transmission network as described in Section 3.1.3.

5.5 Roles and responsibilities

The roles that ACEN, PCL and Transgrid have assigned to the project are briefly described below.

5.5.1 The ACEN management team

Project Manager

The ACEN Project Manager is to ensure that the works that are the subject of this plan are undertaken according to the CoCs of Development Consent SSD 10452 and commitments outlined in the EIS. The ACEN Project Manager is accountable to ACEN senior management.

The ACEN Project Manager is also responsible for engaging PCL and Transgrid to undertake the works. In addition, the ACEN Project Manager will provide safety and environmental advice to the project team and engage with the regulators and the community.

Assistant Project Manager

The Assistant Project Manager provides support to the Project Manager in ensuring the conditions of the Development Consent (SSD 10452) and the commitments under the EIS are followed, and that all other project commitments with the relevant stakeholders are adhered to by the Project, including all contractual commitments with the EPC Contractor.

The Assistant Project Manager is accountable to ACEN Project Manager.

Health & Safety Advisor

The Health & Safety Advisor provides assistance and support to the ACEN Project team and, the EPC Contractor and its subcontractors to fulfil their contractual and legislative obligations with regards to Health and Safety.

The Health & Safety Advisor is accountable to the Project Manager.

5.5.2 PCL management team

The key roles to be filled by PCL as EPC contractor include a project manager, a health, safety and environment (HSE) manager, a construction manager and a site manager. Their roles are described below.

Lead Project Manager

The PCL Lead Project Manager is responsible for the preparation of preconstruction constructability assessment, budget control, contract administration, planning subcontractor work, tendering and award, subcontract issuance, subcontractor liaison, change management, safety management, complaint management procedure and district and owner reporting. The PCL Lead Project Manager will also be responsible for direct communication with the PCL project team and will engage with the community regarding the PCL site.

Lead Construction Manager

The PCL Lead Construction Manager has the responsibility to plan, coordinate and supervise all on-site functions to ensure that the project is constructed in accordance with design and quality expectations, within the stipulated budget and schedule. Develop and execute quality control plans, inspect work for conformity to specifications and arrange for correction of defects/ deficiencies. The Lead Construction Manager will also manage site communication between the construction team and project managers. Lead construction manager is also responsible for contractor management and communicating directly with the Project Ecologist and reporting.

Health, Safety and Environment Manager

The PCL Health, Safety and Environment (HSE) Manager reports to the Country Manager and works directly with Lead Construction Manager and HSE team on site. The HSE Manager is based on site and is responsible for direct supervision of the on site HSE Coordinator as well as for conducting project audits and inspections. The HSE Manager is also responsible for:

- ensuring the safety and environmental training of all construction staff on PCL's site (in consultation with subcontractor HSE representatives) and ACEN HSE representatives
- managing all field aspects of the project's budget, schedule, safety and general performance
- providing proactive leadership in:
  - health, safety and environment, including construction procedures and safe work, and job safety analysis
  - and project planning and execution

- incident investigation and management
- track and report all environmental and safety incidents

Construction Manager

The PCL Construction Manager is accountable to and draws authority from the Lead Construction Manager. The Construction Manager is responsible for building excellent relationships with peers, supervisors, direct reports, clients, trade contractors, and consultants.

Design and Commissioning Manager

The PCL Design and Commissioning Manager is responsible for managing the safe energisation of plant.

5.5.3 PCL BoP subcontractors

Each of PCL's BoP subcontractors will have their own HSE management with an obligation to plan, organize and implement training for their workers. The PCL HSE manager will liaise with subcontractor HSE representatives to assist in achieving outcomes.

5.5.4 Project Ecologist

A suitably qualified and accredited Project Ecologist will be subcontracted to the project. The Project Ecologist will report to the Lead Construction Manager and will be responsible for undertaking pre-clearing surveys, supervising clearing and native tree removal, fauna handling and salvage/care, implementing biodiversity management protocols and contributing to site induction materials and biodiversity awareness among project personnel. Project Ecologist will be preparing written reports on their inspections and share with PCL Lead Project Manager and Lead Construction Manager for review and consideration. Further information on the role of the Project Ecologist is set out in the BMP.

5.5.5 Transgrid management team

The key roles to be filled by Transgrid in connecting the Project to the connection assets and transmission network used by Transgrid include a project manager, a health, safety and environment (HSE) manager, a construction manager and a site manager. Their roles are described below.

Project Manager

The Transgrid Project Manager is responsible for the preparation of preconstruction constructability assessment, budget control, contract administration, planning subcontractor work, tendering and award, subcontract issuance, subcontractor liaison, change management, safety management, and district and owner reporting. The Transgrid Project Manager will also be responsible for direct communication with the Transgrid project team and will engage with the community regarding the Transgrid site.

Construction Manager

The Transgrid Construction Manager has the responsibility to plan, coordinate and supervise all on-site functions to ensure that the project is constructed in accordance with design and quality expectations, within the stipulated budget and schedule. Develop and execute quality control plans, inspect work for conformity to specifications and arrange for correction of defects/ deficiencies. The Construction Manager will also manage site communication between the construction team and project managers.

Health, Safety and Environment Manager

The Transgrid Health, Safety and Environment (HSE) Manager reports to the Transgrid Project Manager and is responsible for direct supervision of the district HSE supervisors and coordinators on all major projects as well as conducting project audits and inspections. The HSE Manager is also responsible for planning, organising and implementing environmental and safety training of all construction staff on Transgrid's site.

Site Manager

The Transgrid Site Manager is accountable to and draws authority from the Construction Manager. He is responsible for building excellent relationships with peers, supervisors, direct reports, clients, trade contractors, and consultants.

Commissioning Manager

The Transgrid Commissioning Manager is responsible for managing the safe energisation of plant and the safe connection of the Project to the connection assets and transmission network used by Transgrid.

5.6 Environmental management system

As required under the contract with ACEN, PCL and Transgrid will develop and implement a safety and environmental management system for their works. This system will establish a set of minimum HSE requirements for the works and ensure HSE management in line with good industry practices and legislative requirements.

The objective of the safety and environmental management system is to reduce the frequency and severity of accidents and incidents and to pursue the goal of "zero harm" in relation to safety and environment, through continuous improvement.

The safety and environmental management system shall describe in detail how HSE management will occur on the Project and shall be developed using the approach of the Australian and New Zealand standards:

- AS/NZS ISO 45001:2018 Occupational health and safety management systems
- AS/NZS ISO 9001 Quality management systems
- AS/NZS ISO 14001 Environmental management systems.

Prior to physical connection and energisation with the transmission system, an operational update to the safety and environmental management system shall be provided, reflecting the Contractor's changed role onsite. This update shall, at a minimum:

- document any modifications required to the HSE systems to reflect the operational status of the site
- document the process for assessing any new, changed or evolving hazards given the operational status of the site and confirming the adequacy of existing controls
- document minimum training requirements for access to and operation of any equipment that will be operational, energized or required for the purpose of exporting energy to the transmission network, from the period of First Synchronization through to Practical Completion.

A component of the safety and environmental management system will be an environmental management system, developed using the approach of the AS/NZS ISO 14001a standard. A well designed and carefully implemented environmental management system provides an important framework for environmental management activities.

PCL and Transgrid will implement environmental management systems consistent with that outlined below and the requirements of ACEN.

This environmental management system is a five-step iterative system which comprises the documented systems and processes used for the safe construction of the Project. The system enables hazards to be identified and assessed to eliminate or minimise the risk of impact to the environment to a level that is as low as reasonably practical (ALARP) throughout construction of the project. This EMS describes how the risks are assessed and managed, as outlined below and in and shown diagrammatically in Figure 5.10.

Step 1 – Policy establishment: The environmental management system development process starts with establishing an Environmental Policy that is tied to the organization's mission. ACEN, PCL and Transgrid each have environmental policies.

Step 2 – Planning: The planning step consists of identifying regulatory and other requirements; identifying processes, resources, and significant environmental impacts; identifying management and mitigation measures; developing objectives and targets for improvement efforts; and creating a planning, programming, and budgeting system.

The implementation and operation of various components of the environmental management system are detailed in the management plans, as appropriate.

Step 3 – Implementation: The implementation step consists of defining the structure, responsibilities, and programs; implementing induction and training; creating the environmental management system documentation (including document control and record keeping); communicating the environmental management system to personnel; developing and implementing standard operating procedures [SOPs]; and developing and implementing emergency preparedness and response procedures.

The implementation and operation of various components of the environmental management system are detailed in the management plans, as appropriate.

Step 4 – Checking and correction: The checking and corrective action step includes monitoring and measuring (e.g., internal assessments), problem and cause identification, corrective and preventative action implementation, and an environmental management system review.

Step 5 – Review: In the management review step, upper management reviews the environmental management system, including the results of internal assessments. Modifications to the environmental management system are made, as necessary, to ensure compliance. The management review is designed to ensure continual improvement of the environmental management system, taking into account the results of checking and corrective actions undertaken in Step 4.

Figure 5.10 Environmental Management System Process

5.7 Risk assessment and register

PCL and Transgrid will create and maintain separate risk registers in consultation with ACEN that will be used to record identified hazards, risk assessment and risk control methods. ACEN will ensure that risk communication is exchanged between all three parties.

Risk assessments will be undertaken by PCL and Transgrid that consider all HSE risks associated with the works. The risk assessments will be used to populate HSE risk registers. The risk registers will specifically include, identify and address environmental risks. The risk assessment process will be broadly consistent with the *ISO 31000, Risk management* standard (or Australian Standard equivalent).

The risk registers will be live documents that are consistently updated as the works progress, with risks and control methods added, reviewed, modified and retired as appropriate.

5.8 Emergency response

An Emergency Plan (EP) has been prepared setting out the actions to be followed by ACEN, PCL and Transgrid in the event of an emergency, covering:

- contact details and communication
- the type and location of emergency equipment
- emergency preparedness and response
- training
- raising the emergency alarm
- emergency evacuation procedures
- testing and recording drills
- fire water supply/fire response trailers
- fire surveillance
- flood response.

A Bushfire Management Plan has also been prepared.

5.9 Document management system

PCL and Transgrid will implement a web-based project and document management systems for project correspondence, including the communication and transmittal of all information requests and responses and the issue of all drawings and documents and the review and approval of the same.

The system shall maintain document registers which list all documents and drawings including those in relation to environmental management such as:

- environmental management plans and subplans
- aspects and impacts register
- risk register
- standards, codes and guidelines
- environmental procedures
- incident and non-compliance reports
- monitoring, inspection and auditing reports
- community engagement database and complaints register
- safety data sheets
- ACEN and regulator correspondence.

The system will record information including:

- title, document number and revision
- review status

- date of approval.

5.10 Administrative conditions

Schedule 2 of the DC sets out administrative conditions, a number of which are relevant to the Works of PCL and Transgrid, as outlined below (where not covered earlier in this EMS).

5.10.1 Terms of consent

In accordance with CoC 4, ACEN, with the assistance of PCL and Transgrid, will comply with any relevant requirement/s of the Planning Secretary arising from the Department's assessment of:

- any strategies, plans or correspondence that are submitted in accordance with this consent
- any reports, reviews or audits commissioned by the Department regarding compliance with this consent
- the implementation of any actions or measures contained in these documents.

5.10.2 Upgrading of solar panels and ancillary infrastructure

In accordance with CoC 5, ACEN 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, ACEN will provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.

5.10.3 Structural adequacy

In accordance with CoC 6, PCL and Transgrid will 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*.

5.10.4 Demolition work

In accordance with CoC 7, PCL and Transgrid will 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.

5.10.5 Protection of public infrastructure

In accordance with CoC 8, unless ACEN and the applicable authority agree otherwise, PCL and Transgrid will:

- repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development
- relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

5.10.6 Operation of plant and equipment

In accordance with CoC 9, PCL and Transgrid will ensure that all plant and equipment used on site, or in connection with the development, is:

- maintained in a proper and efficient condition; and
- operated in a proper and efficient manner.

6 Monitoring, auditing, reporting and review

During construction there will be continuous monitoring, auditing, reporting and review by PCL and Transgrid of their construction areas and construction activities. Individuals and work crews will be required to demonstrate that the requirements of this EMS and other management plans and subplans are being adhered to.

All reports, reviews, and audits will be maintained by the PCL and Transgrid Project Managers and will be made be available on request to the appropriate managers (ACEN and subcontractors). Audit results will be used to review management techniques to ensure compliance with the DC.

6.1 Monitoring

Monitoring of environmental impacts is an essential component of effective environmental management. Specific monitoring requirements for individual environmental aspects during the works by PCL and Transgrid are set out in the management plans and subplans shown in Figure 1.2.

6.1.1 Aspects to be monitored

Environmental aspects to be monitored will include:

- transport
- land management
- biodiversity
- amenity (noise, dust, visual, lighting)
- heritage
- soil and water
- hazards
- waste
- socio-economic
- rehabilitation.

The CEMP contains monitoring summary tables that set out:

- aspect being monitored
- purpose of monitoring
- nature of monitoring
- frequency
- responsibility.

6.1.2 Site inspection

Regular site inspections, as detailed below, will be a key component of the environmental monitoring program.

During the works, PCL, Transgrid and subcontractors will conduct regular inspections to confirm compliance with the CEMP and subplans and to ensure all construction footprints are compliant with approved development plans. Inspection records will be maintained by PCL and Transgrid and reported to ACEN on a regular basis using environmental and safety inspection checklists, such as the examples in Appendix G.

Inspection reports will be circulated weekly to the PCL and Transgrid Project Managers and the on-site team by the safety coordinators via a system called SMC (Safety Management Centre). Key environmental risks and issues will be discussed at pre-start team meetings and toolbox meetings taking into account the specific risks and issues associated with the proposed day's work (e.g. associated with the specific activities to be undertaken, and external risk factors such as the weather). Risks and issues are updated daily.

Daily inspections

The PCL and Transgrid Construction Managers will ensure that site personnel are undertaking daily inspections of the construction activities they are overseeing to ensure general compliance with the CEMP and subplans. All areas identified for improvement will be addressed directly and inspection will be recorded in the SMC.

Weekly monitoring

Once per week (at least) during construction, the PCL and Transgrid Construction Managers and/or delegate(s) will conduct monitoring of construction activities to ensure compliance with the CEMP and subplans. All areas identified for improvement will be added to a corrective action register.

Monthly inspections

Once per month (at least) during construction, the PCL and Transgrid Project Managers and/or delegate(s) will conduct a thorough inspection of construction activities to ensure compliance with the CEMP and subplans. The PCL and Transgrid Project Managers and/or delegate(s) will also conduct an inspection of the condition of the roads for, and responding to, any emergency repair and/or maintenance requirements. All these inspections and areas identified for improvement will be recorded in SMC.

Table 6.1 lists environmental aspects and the associated frequency of inspection and monitoring, cross-referencing the section of this report or the management subplan where the monitoring requirements are set out. Specific monitoring and inspection requirements are summarised in greater detail in Section 9, Table 9.1 of the CEMP.

In addition to the overall inspection and monitoring responsibilities of the PCL and Transgrid Construction Managers and Project Managers, outlined above, Table 9.1 of the CEMP also outlines specific responsibilities of the Traffic Supervisor, HSE Supervisor, Project Ecologist and Emergency Controller

Table 6.1 Site inspection and monitoring frequency matrix

Aspect	Frequency				
	Daily	Weekly	Fortnightly	Monthly	As required*
Transport (refer to TMP)					
Traffic control measures	Yes	-	-	-	Yes
Land management (see Section 8.2)					
Livestock farming and wellbeing	-	Yes	-	-	-
Property fences and gates	-	Yes	-	-	-
Air quality and dust (see Section 8.4)					
Dust	Yes (dry conditions)	-	-	-	-
Biodiversity (see BMP)					
Vegetation clearance	-	-	-	-	Yes
Fencing		Yes	-	-	-
Salvaged fauna	-	-	-	-	Yes
Weeds	-	-	-	Yes	-
Pest animals	-	-	Yes	-	-
Noise and vibration (see Section 8.5)					
Noise	-	-	-	-	Yes
Visual environment (see Section 8.6)					
Visual pollution	-	Yes	-	-	Yes

Lightspill	-	-	-	-	Yes
Heritage (see Section 8.6)					
Aboriginal cultural heritage (avoidance)	-	Yes	-	-	-
Aboriginal and historic cultural heritage (chance finds)	-	-	-	-	Yes
Soil and water (see SWMP)					
Vegetation	-	Yes	-	-	-
Tracked mud and dirt	Yes	-	-	-	-
Drains	Yes	-	-	-	Yes
Stream crossings and culverts	-	Yes	-	-	Yes
Settlement basins, bunds, sediment fences, filters and screens	-	Yes	-	-	Yes
Chemical storage areas	-	Yes	-	-	Yes
Hazards (see EP and Bushfire Management Plan)					
Fire risk management	Yes (during high risk days)*	Yes	-	-	-
Waste management (see WMP)					
Waste	-	Yes	-	-	Yes
Socio-economic environment (see AES)					
Accommodation	-	-	-	Yes	-

6.2 Incidents and non-compliances

6.2.1 Incident notification and response

Any incident that results in harm to the environment and/or off-site receptors is to be regarded as an environmental incident. It is a mandatory requirement for any personnel working for or on behalf of ACEN, PCL or Transgrid to respond to all hazards and events that have affected or have the potential to adversely affect the environment.

As defined in the DC an incident is a set of circumstances that causes or threatens to cause material harm to the environment. Material harm is defined in the DC as harm that:

- involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or makegood harm to the environment.

In accordance with CoC 7 (Schedule 4), the Planning Secretary will be notified in writing via the Major Projects website. After ACEN becomes aware of and incident, they will immediately notify the Department via this website. Accordingly, the PCL or Transgrid Lead Project Manager will notify the ACEN Project Manager immediately after a reportable incident occurs to enable prompt reporting by ACEN to the Planning Secretary. The notification from ACEN will 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.

Incident reporting requirements and responsibilities are set out in Table 6.2. The table identifies reportable based on the definition in the DC. It is ACENs responsibility to ensure that notifications are undertaken in accordance with the consent.

Note that safety incidents are defined in site safety documentation separate to this EMS.

Table 6.2 Incident notification requirements and responsibilities

Incident level	Definition	Notification	Responsibility
Reportable	Causes or threatens to cause material harm to the environment (see definition in DC): • involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or • results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (such loss includes the reasonable costs and expenses	• Internal: to PCL/Transgrid HSE Manager, Lead Manager (immediately) • External: to ACEN Project Manager, (immediately) • DPE: to the Planning Secretary, (immediately	• PCL/Transgrid Lead Project Manager • ACEN Project Manager to report to DPE, Planning Secretary

Incident level	Definition	Notification	Responsibility
	that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or makegood harm to the environment.	after the ACEN Project Manager becomes aware of an incident)	

Subsequent notification requirements will be given, and reports submitted in accordance with the requirements set out in Appendix 7 of the DC. This includes submission of a written incident notification addressing the requirements set out below to the Planning Secretary via the Major Projects website within seven days after ACEN 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.

The written incident notification will address the following requirements:

- identify the development and application number
- provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
- identify how the incident was detected
- identify when the applicant became aware of the incident
- identify any actual or potential non-compliance with conditions of consent
- describe what immediate steps were taken in relation to the incident
- identify further action(s) that will be taken in relation to the incident
- identify a contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, ACEN will 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. The written incident notification will include:

- a summary of the incident
- outcomes of an incident investigation, including identification of the cause of the incident
- details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
- details of any communication with other stakeholders regarding the incident.

Response agencies need to be informed of pollution incidents quickly, so action can be coordinated to prevent or limit harm to the environment and human health generally. These are listed in Table 6.3.

Incidents will be recorded in an Incident Register, as outlined in Section 6.4.

6.2.2 Non-compliance notification and response

A project non-compliance is defined in the DC as an occurrence, set of circumstances or development that is a breach of the consent but is not an incident.

Environmental non-compliances will be reported and actioned through the incident management procedures detailed in Section 6.2.1, above.

In accordance with CoC 8 (Schedule 4), ACEN will notify the Department in writing via the Major Projects website within 7 days after becoming aware of any non-compliance with the conditions of this consent. Accordingly, the PCL or Transgrid Lead Project Manager will notify the ACEN Project Manager no greater than 24 hours after a non-compliance is identified to enable prompt reporting by ACEN to the Planning Secretary.

In accordance with CoCs 8 and 9 (Schedule 4) the non-compliance notification to the Planning Secretary will 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. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

Table 6.3 Response agency contact details

Response agency	Contact details
Environment Protection Authority NSW (EPA NSW)	131 555 or (02) 9995 5555
Ministry of Health NSW	(02) 9391 9000
SafeWork NSW	131 050
The local authority, Mid Western Regional Council	(02) 6378 2850
Fire and Rescue NSW (Gulgong Local Station)	(02) 6374 1049
Rural Fire Service	1800 679 737
Rural Fire Service (Cudgegong Office)	(02) 6372 4434
Heritage NSW (for Aboriginal finds, as per HMP)	(02) 9873 8500
NSW Police (for human remains, as per HMP)	131 444

6.2.3 Corrective actions

Once an environmental incident or non-conformance has been reported to the ACEN Project Manager, a set of appropriate corrective actions will be raised by PCL and Transgrid. Measures already implemented, additional measures to be implemented as a result and any corrective actions will be reported to the ACEN Project Manager. Actions will be implemented to the satisfaction of the ACEN Project Manager and their effectiveness confirmed to demonstrate

appropriate measures have been implemented to acceptably minimise the risk of reoccurrence.

6.3 Auditing

In accordance with CoC 11 (Schedule 4), PCL and Transgrid will commission independent environmental audits of the development in accordance with the *Independent Audit Post Approval Requirements* (2020) within 3 months of commencing construction. The independent audit will be carried out in accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020). Additionally, in accordance with the requirements the Independent Audit Post Approval Requirements (2020), the ACEN will:

- 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
- submit the response to the Planning Secretary
- 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.

Independent Audit Reports and ACEN's response to audit findings will be submitted to the Planning Secretary within two 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.

PCL and Transgrid will manage the independent environmental auditing process, make documents and site personnel available as required and implement the recommendations of the audits.

Proposed independent auditors will be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

It is noted that 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 will be commenced.

6.4 Record keeping

PCL and Transgrid will maintain an Incident Register for the project and will make this available to ACEN upon request. The Incident Register will document, record, track, manage and report all environmental (and safety) incidents and observations.

PCL and Transgrid will also maintain a Complaints Register for the project and will make this available to ACEN upon request. The Complaints Register will document, record, track, manage and report all complaints.

The document management systems of PCL and Transgrid (see Section 5.9) will underpin the process of record-keeping, including tracking monitoring and inspection reports and audit findings and associated close-out actions.

6.5 Review and update

PCL and Transgrid will undertake ongoing review and improvement of existing systems and controls.

In accordance with CoC 2, (Schedule 4), this EMS (and any strategy, plan or program required under the DC) will be reviewed to the satisfaction of the Secretary of DPE. The EMS will be:

- updated prior to carrying out any upgrading or decommissioning activities on site
- reviewed and, if necessary, the strategies, plans or programs required under this consent revised to the satisfaction of the Secretary within 1 month of the:
  - submission of an incident report under CoC 7 (Schedule 4)
  - submission of an audit report under CoC 9 (Schedule 4) or
  - any modification to the conditions of this consent.

When revised, the revision status of this EMS will be indicated on the title page of this document. This EMS will be made publicly available on the project website in accordance with CoC 17 (Schedule 4) of the DC. A hard copy of the EMS will also be kept at the site project office during construction.

As the EMS is an overriding framework, it will be reviewed and updated yearly (at a minimum).

Review is a critical element of environmental management systems and involves a formal evaluation of the adequacy of the environmental management plans and documents – taking into account any new environmental issues, legislation, changing circumstances and continual improvement.

To ensure a rigorous, all-encompassing review process, PCL and Transgrid will conduct quarterly management review meetings with ACEN. These meetings should be attended by individuals with either executive or specialist responsibility. At this stage of the development this may include:

- the ACEN Project Manager
- the ACEN HSE Advisor
- the PCL/Transgrid Project Manager
- the PCL/Transgrid HSE Manager
- the PCL/Transgrid Construction Manager
- the Transgrid Site Manager
- the subcontractor management representatives, as appropriate.

PCL and Transgrid commit to complying with CoC 4 (Schedule 2) and will:

- comply with any requirement/s of the Secretary arising from the Department's 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

PCL and Transgrid commit to complying with CoC 2 in full.

6.6 Continuous improvement of environmental performance

Areas for improvement identified during daily inspections will be addressed by the PCL and Transgrid environment teams at daily pre-start (Toolbox) meetings with the appropriate construction supervisor and crew.

At the discretion of the environment team, identified areas of improvement may also form the basis for more formalised weekly project meeting. Addressing non-conformance and areas for improvement with the construction crews in this forum is aimed at continuously improving the environmental performance of the project and driving environmental awareness on site.

Audits also play an important part in the continuous improvement process and the results of the audits should be considered when updating the EMS.

7 Community and stakeholder engagement

7.1 Community Engagement Plan

A Community Engagement Plan (CEP) has been prepared by PCL for the proposed works, consistent with the overarching CEP prepared by ACEN.

The PCL CEP covers engagement with the community and also other stakeholders such as regulators. The preparation of the CEP is consistent with the commitment to a community and stakeholder engagement plan by ACEN in the project environmental impact statement (EIS) (Ramboll 2020) and the document *Undertaking Engagement Guidelines for State Significant Projects* (DPE 2022). The CEP also meets the requirements of a number of Conditions of Consent (CoCs) in Development Consent (DC) – Application Number: SSD-10452.

Transgrid will follow the approach to community and stakeholder engagement set out in the PCL CEP.

The CEP includes:

- a summary of previous engagement
- a list of identified stakeholders
- a Communication and Engagement Plan, that comprises the following:
  - principles
  - roles and responsibilities
  - engagement risks
  - approach
  - consultation tools
  - tabulated engagement plan (stakeholder, engagement activity, responsibility and timing)
  - complaints management

7.2 Notifications to DPE prior to key project stages

In accordance with CoC 4 (Schedule 4) prior to commencing construction, ACEN will notify DPE 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 ACEN will notify DPE in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.

7.3 Website

A website has been established by ACEN for the Project https://stubbosolar.com.au/

A Facebook page has also been established by ACEN at https://www.facebook.com/StubboSolar

The website will be maintained and kept up to date by ACEN and will offer community and stakeholders the opportunity to contact through **email** info@stubbosolar.com.au and Community Information Line: 1800 434 062.

The Stubbo Solar Facebook page is intended as a resource to "push" information updates.

In accordance with CoC 17 (Schedule 4) the website will make the following information publicly available at minimum, as relevant to the stage of the development:

- EIS and response to submissions
- the final layout plans for the development
- current statutory approvals for the development
- approved strategies, plans or programs required under the conditions of this consent
- the proposed staging plans for the development
- how complaints about the development can be made
- a Complaints register (see Section 8)
- compliance reports
- any independent environmental audit, and the Applicant's response to the recommendations in any audit (see Section 6.3)
- any other matter required by the Secretary.

PCL and Transgrid will support ACEN by providing information, where appropriate, for uploading to the website.

7.4 Dissemination of environmental information

ACEN commits to ensuring stakeholders are kept informed about the environmental performance of the development. ACEN has established a project office that provides the opportunity for members of the community to meet with project team and access to factsheets and project information. The office is located at 79B Herbert Street, Gulgong and is open 9:00am-5:00pm Tuesday- Thursday. In addition, project information will be disseminated by:

- newsletters, notifications and factsheets
- phone calls
- face-to-face meetings.

The CEP contains an engagement plan outlining how ACEN, PCL and Transgrid will inform and consult with stakeholders during construction.

PCL and Transgrid will support ACEN by providing information, where appropriate, in the dissemination of environmental information.

Further detail regarding information dissemination is provided in Sections 6.5 and 6.6 of the CEP.

7.5 Consultation with DPE in relation to this EMS

This EMS has been reviewed by the DPE Energy Assessments team. Appendix H tabulates the feedback received from DPE and the responses of ACEN.

8 Complaints management

In the event that a complaint is received from the community, the PCL and Transgrid Project Managers (or their representative) will ensure the complaint is recorded, reported to ACEN and that further investigation is undertaken. If PCL receives the complaints associated with Transgrid's work, these will be communicated to ACEN and ACEN will contact Transgrid for further investigation and resolution. Similarly, if Transgrid receives the complaints associated with PCL's work, these will be communicated to ACEN and then ACEN will contact PCL for further investigations and management. The process for managing complaints is described below.

8.1 Complaints management procedure

ACEN will maintain a Complaints Register document and PCL and Transgrid will manage and maintain registers for their relevant works. ACEN will ensure that the Complaints Register is made available on the Project website and it is updated regularly, in accordance with CoC 17 (Schedule 4), with personal details kept private.

If a complaint is received from the community, the PCL and Transgrid Project Managers (or their representative) will ensure the complaint is recorded, reported to ACEN and that further investigation is undertaken.

Any complaints received by ACEN relating to the activities of PCL or Transgrid will be passed on to the Construction Managers for discussion and action.

Complaints management will include procedures for receiving and addressing complaints from the community about development-related traffic.

Complaints will be recorded by PCL and Transgrid in their Complaints Registers, which will include the following:

- the date and time, where relevant, of the complaint
- the means by which the complaint was made (telephone, mail, email or in person)
- who received the complaint
- any personal details of the complainant that were provided, or if no details were provided, a note to that effect
- the nature of the complaint
- any actions taken in relation to the complaint, including timeframes for implementing the action
- if no action was taken in relation to the complaint, the reason(s) why no action was taken
- the status of the complaint (i.e. open/closed)
- measures to avoid reoccurrence (if any).

The Complaints Registers will be managed and maintained by the PCL and Transgrid Project Managers or their representative during construction. They will be responsible for:

- notifying the ACEN Project Manager of the complaint
- providing a response to the person complaining within 72 hours of the complaint being made
- ensuring that the complaint is addressed within 10 business days and that the complaint is addressed adequately
- logging all details of the complaint in the Complaints Register
- the PCL Lead Construction Manager or the Transgrid Site Manager to ensure any lessons learnt from the complaint are incorporated into relevant management procedures.

8.2 Contact details for complaints

Table 8.1 lists the avenues available for complaints and enquiries to be lodged by the community and other stakeholders.

Table 8.1 Contact details for complaints

Company	Contact details
ACEN	**Website:** https://stubbosolar.com.au/ **Facebook:** https://www.facebook.com/StubboSolar **Email:** info@stubbosolar.com.au **Community Information Line:** 1800 434 062
PCL	**Email:** stspcommunity@pcl.com
Transgrid	**Phone:** 1800 222 537 (Community Engagement Team) **Email:** community@Transgrid.com.au **Online:** Contact Us - Transgrid NSW & ACT Australia | Transgrid **In Writing:** PO Box A1000, Sydney South NSW 1235 Australia (to Community Engagement Manager)

The above contact details will be disclosed on each company's website. Each company will include their contact details on all community notifications.

8.3 Internal reporting of complaints

Complaints received by PCL and Transgrid will be referred by the Lead Project Manager to the ACEN Project Manager within 24 hours along with information regarding any initial response to the complaint. Any follow-up actions will be agreed with ACEN.

If a complaint referred by PCL relates to Transgrid activities, ACEN will refer the complaint to Transgrid, and vice-versa. PCL and Transgrid will be individually responsible for implementing actions in relation to complaints that relate to their respective activities.

8.4 Dispute resolution

In the event that the actions taken to address a complaint, including the measures for avoiding a recurrence, are not sufficient to satisfy the complainant and a dispute arises, ACEN will do the following:

- advise DPE that there is a dispute
- provide DPE with copies of the relevant complaint history
- if determined necessary by DPE, engage a specialist with expertise relevant to the issue at hand to investigate the dispute and provide recommendations for resolution
- advise the third party in dispute (the complainant) and DPE in writing, as to when the dispute investigation will be completed
- provide the third party and DPE a copy of the dispute investigation report, inclusive of the ACEN's intentions with regards to the implementation of the recommendations for resolution.

PCL and Transgrid will support ACEN, where appropriate, in the reporting, understanding and resolution of disputes.

9 References

Ramboll (2020) Stubbo Solar Farm: Environmental Impact Statement, prepared for UPC\AC Renewables Australia Pty Ltd by Ramboll Australia Pty Ltd. November 2020

Ramboll (2021a) Stubbo Solar Farm: Response to Submissions Report, prepared for UPC\AC Renewables Australia Pty Ltd by Ramboll Australia Pty Ltd. June 2021

Ramboll (2021b) Stubbo Solar Farm: Amendment Report, prepared for UPC\AC Renewables Australia Pty Ltd by Ramboll Australia Pty Ltd. June 2021

Appendix A:
Development consent

Appendix B:
Conditions of consent

Table B1 relevant conditions from Development Consent - Application Number: SSD-10452

Condition No.	Condition Description	Reference
Schedule 2 Administrative Conditions		
Obligations to minimise harm to the environments		
1	*In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.*	EMS Section 1.3/ CEMP
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.*	EMS Section 2/ CEMP
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.*	EMS Section 2/ CEMP
4	*The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:*	EMS Section 5.10.1

Condition No.	Condition Description	Reference
	(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.*	
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.*	EMS Section 5.10.2
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.*	EMS Section 5.10.3
Demolition		

Condition No.	Condition Description	Reference
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.*	EMS Section 5.10.4
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.*	EMS Section 5.10.5
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.*	EMS Section 5.10.6
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*	Land subdivision is part of the scope of Stage 2a

Condition No.	Condition Description	Reference
	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.*	
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.*	Outside scope of Stage 2a
Schedule 3 Environmental Conditions - General		
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*	Outside scope of Stage 2a
Transport: Over-Dimensional and Heavy Vehicle Restrictions		

Condition No.	Condition Description	Reference
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.*	Traffic Management Plan (TMP)
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.*	TMP
Transport: 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.*	TMP
Transport: 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.*	TMP

Condition No.	Condition Description	Reference
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.*	TMP
7	*The site access point off Barneys Reef Road may only be used for emergency purposes.*	TMP
Transport: 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 TfNSW supplements) and be carried out to the satisfaction of the relevant roads authority.*	Outside scope of Stage 2a
Transport: Road Maintenance		
9	*The Applicant must:*	TMP

Condition No.	Condition Description	Reference
	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 road's 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.*	
Transport: Operating Conditions		
10	*The Applicant must ensure:* *a) the internal roads are constructed as all-weather roads;* *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*	TMP
Transport: Traffic Management Plan		

Condition No.	Condition Description	Reference
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 or platoons;* • *responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;*	TMP

Condition No.	Condition Description	Reference
	• *monthly monitoring for, and responding to, any emergency repair and/or maintenance requirements; and* • *a traffic management system for managing over-dimensional vehicles;* *d) a driver's code of conduct that addresses:* • *travelling speeds;* • *driver fatigue;* • *procedures to ensure that drivers adhere to the designated transport routes and speed limits; and* • *procedures to ensure that drivers implement safe driving practices;* *e) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan.* *Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.*	
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.*	CEMP
Biodiversity: Vegetation Clearance		

<table>
<tr><th>Condition No.</th><th>Condition Description</th><th>Reference</th></tr>
<tr><td>13</td><td>The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.</td><td>Biodiversity Management Plan (BMP)</td></tr>
<tr><td colspan="3">Biodiversity: Biodiversity Offsets</td></tr>
<tr><td>14</td><td>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.
Table 1: Timing for retirement of biodiversity credits
<table><tr><th>Project Element</th><th>Timing</th></tr><tr><td>Road Upgrades</td><td>Prior to commencing road upgrades</td></tr><tr><td>Project site</td><td>Prior to commencing construction</td></tr></table></td><td>BMP</td></tr>
</table>

Condition No.	Condition Description	Reference

Table 2: Ecosystem Credit Requirements

Vegetation community	***PCT ID***	***Credits required****	
		Road upgrades	*Project Site*
Western Grey Box –cypress pine shrub grass shrub tall woodland	*81*	*40*	*-*
White Box grassy woodland	*266*	*1*	*-*
Rough-Barked Apple –Red gum – Yellow box woodland	*281*	*89*	*354*
Slaty Gum woodland (Moderate – good)	*1177*	*19*	*-*
Narrow-leaved Ironbark –Red Stringybark –Black pine woodland	*1770*	*-*	*2*

Table 3: Species Credit Requirements

Vegetation community	***Credits required****	
	Road upgrades	*Project Site*

Condition No.	Condition Description			Reference
	Acacia ausfeldii (Ausfeld's Wattle)	*152*	-	
	Diuris tricolor (Pine Donkey Orchid)	*114*	-	
	Grevillea wilkinsonii (Tumut Grevillea)	*229*	-	
	Small Purple-pea (Swainsona recta)	*152*	-	
	Silky Swainson-pea (Swainsona sericea)	*152*	-	
	Major Mitchell's Cockatoo (Lophochroa leadbeateri)	*152*	-	
	Gang-gang Cockatoo (Callocephalon fimbriatum)	*152*	-	
	Glossy Black-Cockatoo (Calyptorhynchus lathami)	*152*	-	
	Sloane's Froglet (Crinia sloanei)	*114*	-	
	Brush-tailed Phascogale (Phascogale tapoatafa)	*152*	-	
	Powerful Owl (Ninox strenua)	*152*	-	
	Barking Owl (Ninox connivens)	*152*	*279*	

<table>
<tr><th>Condition No.</th><th>Condition Description</th><th>Reference</th></tr>
<tr><td></td><td>
<table>
<tr><td>Superb Parrot (Polytelis swainsonii)</td><td>152</td><td>-</td></tr>
<tr><td>Masked Owl (Tyto novaehollandiae)</td><td>152</td><td>-</td></tr>
</table>
* note that credits have been recalculated since the DC was issued
</td><td></td></tr>
<tr><td colspan="3">Biodiversity: Biodiversity Management Plan</td></tr>
<tr><td>15</td><td>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 on site;
• 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</td><td>BMP</td></tr>
</table>

Condition No.	Condition Description	Reference
	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.*	
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.	EMS Section 3.3 /CEMP
Amenity: Noise		
17	*The Applicant must:*	CEMP

Condition No.	Condition Description	Reference
	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.*	
Amenity: Dust		
18	*The Applicant must minimise the dust generated by the development.*	CEMP
Amenity: 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.*	CEMP
Amenity: 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:*	CEMP

Condition No.	Condition Description	Reference
	• *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.*	
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.*	Heritage Management Plan (HMP)
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.*	HMP
Heritage: 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 Stakeholder* *c) include a description of the measures that would be implemented for:*	HMP

Condition No.	Condition Description	Reference
	• *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.*	
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*	Soil and Water Management Plan (SWMP)
Soil and Water: Water Pollution		

Condition No.	Condition Description	Reference
25	*The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.*	SWMP
Soil and Water: Operation 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 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.	SWMP
Soil and Water: Soil and Water Management Plan		

Condition No.	Condition Description	Reference
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.* *The Applicant must implement the Soil and Water Management Plan for construction upgrading, operation and/or decommissioning of the development.*	SWMP
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.*	Outside scope of Stage 2a
Hazards: Storage and Handling of Dangerous Goods		

Condition No.	Condition Description	Reference
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.*	SWMP
Hazards: 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 Protection Zones;* • *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.*	Emergency Plan (EP) and Bushfire Management Plan

Condition No.	Condition Description	Reference
Hazards: 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;* *d) list works that should not be carried out during a total fire ban* *e) include availability of fire suppression equipment, access and water;* *f) include procedures for the storage and maintenance of any flammable materials;* *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 an emergency;* *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*	EP

Condition No.	Condition Description	Reference
	m) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: • there is a fire on-site or in the vicinity of the site; • there are any activities on site that would have the potential to ignite surrounding vegetation; or • there are any proposed activities to be carried out during a bushfire danger period; and *n) include details on how the battery storage facility and sub-systems can be safely isolated in an emergency.* *The Applicant must implement the Emergency Plan for the duration of the development.*	
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 its classification;* *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.*	Waste Management Plan
Accommodation and Employment Strategy		

<table>
<tr><th>Condition No.</th><th>Condition Description</th><th>Reference</th></tr>
<tr><td>33</td><td>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.</td><td>Accommodation and Employment Strategy (AES)</td></tr>
<tr><td colspan="3">Decommissioning and Rehabilitation</td></tr>
<tr><td>34</td><td>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.

Table 4: Rehabilitation Objectives
<table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Site</td><td>•Safe, stable and non-polluting</td></tr></table></td><td>Outside Stage 2a scope</td></tr>
</table>

<table>
<tr><th>Condition No.</th><th>Condition Description</th><th>Reference</th></tr>
<tr><td></td><td>
<table>
<tr><td></td><td>•Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</td></tr>
<tr><td>Solar farm infrastructure</td><td>•To be decommissioned and removed, unless the Planning Secretary agrees otherwise</td></tr>
<tr><td>Land use</td><td>•Restore land capability to pre-existing use</td></tr>
<tr><td>Community</td><td>•Ensure public safety at all times</td></tr>
</table>
</td><td></td></tr>
<tr><td colspan="3">Schedule 4: Environmental Management and Reporting</td></tr>
<tr><td colspan="3">Environmental Management: Environmental Management Strategy</td></tr>
<tr><td>1</td><td>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</td><td>This EMS
a) This document
b) EMS Section 2
c) EMS Section 5.5
d) EMS Sections 6, 7 & 8
e) EMS Section 7</td></tr>
</table>

Condition No.	Condition Description	Reference
	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.	
Environmental Management: 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.*	CEMP
Environmental Management: 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.*	CEMP

Condition No.	Condition Description	Reference
	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.	
Notification: 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.*	CEMP
Notification: 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*	CEMP
Notification: Work as Executed Plans		

Condition No.	Condition Description	Reference
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.*	CEMP
Notification: 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.*	CEMP
Notification: 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.*	CEMP
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.*	CEMP
10	*A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.*	CEMP
Independent Environmental Audit		

Condition No.	Condition Description	Reference
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.*	CEMP
12	*Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.*	CEMP
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.*	CEMP
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*	CEMP
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.*	CEMP

Condition No.	Condition Description	Reference
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.*	Outside Stage 2a scope
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.* • *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.*	EMS Section 7.3/ CEP

Appendix C:
EIS and Amendment report commitments

Table C1 Consolidated EIS and Amendment report commitments

ID	Management/ mitigation measure	Management plan/Timing
Consultation		**CEP**
C1	*UPC\AC is committed to ongoing consultation through detailed design and compliance with Transgrid's design requirements including:* • *ensuring that the design and construction of the access track is compliant with the Transgrid Easement Guidelines* • *ensuring that any fencing and gates within the easement corridor are designed and installed in accordance with the Transgrid Fencing Guidelines and that access to the easement by Transgrid is provided for* • *maintaining the condition of the track into the future* • *accounting for times when Transgrid may need to close or modify the track to operate and maintain their assets* • *continued consultation with the landowner to put in place any requisite property interests and consultation with Transgrid to ensure that their usage of the easement is not materially impaired.*	Prior to construction/ construction
Biodiversity		**BMP**
B1	*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.*	Prior to construction/ construction
B2	*Pre-clearance surveys will be undertaken prior to tree clearing.*	Prior to construction/ construction

ID	Management/ mitigation measure	Management plan/Timing
	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.*	
B3	*A procedure will be developed for the relocation of habitat features (e.g. fallen timber, hollow logs) to adjacent retained habitat.*	Prior to construction
B4	*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.*	Construction/ decommissioning
B5	*Appropriate controls will be implemented to manage exposed soil surfaces and stockpiles to prevent sediment discharge into waterways.* *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.*	Prior to construction/ construction
B6	*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.*	Construction/ operation
B7	*Dust suppression measures will be implemented to limit dust onsite. Revegetation will also be commenced as soon as practicable to minimise areas likely to create dust.*	Construction
B8	*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.*	Construction

ID	Management/ mitigation measure	Management plan/Timing
B9	*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.*	Construction
B10	*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.*	Construction/ operation
B11	*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*	Construction
B12	*Suitable species will be used as ground cover species in any revegetation areas*	Construction
B13	*All waterway crossings will be designed in accordance with Policy and Guidelines for Fish Friendly Waterway Crossing (DPI, n.d.) where appropriate.*	Detailed design
B14	*Noting that minimising vegetation removal has been a key objective in developing the proposed Blue Springs road upgrade concept design, opportunities to further reduce impacts to vegetation would be considered where possible during the detailed design and construction and impacts at the intersection of Cope Road would be limited to trimming of vegetation needed to provide safe sight distance where possible.*	Detailed design
Aboriginal heritage		**HMP**

ID	Management/ mitigation measure	Management plan/Timing
AH1	*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.*	Prior to construction
AH2	*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 D). 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.*	Prior to construction
AH3	*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.*	Construction
AH4	*The addendum survey area would be included in the Aboriginal cultural heritage management plan (ACHMP), which will detail the processes for managing unanticipated Aboriginal heritage items or potential human remains encountered during the life of the project.*	Prior to construction
Historic heritage		**HMP**
HH1	*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 D) will be enacted.*	Construction
HH2	*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.*	Construction
HH3	*An unanticipated finds protocol for historic heritage will be developed and implemented as required during construction.*	Construction

ID	Management/ mitigation measure	Management plan/Timing
HH4	*The addendum survey area will be included in the Unanticipated Finds Protocol for Historic Heritage which will detail the processes for managing unanticipated historic heritage items during the life of the project.*	Prior to construction
Soils		**SWMP**
S1	*Disturbed areas will be progressively stabilised and rehabilitated as construction is completed to minimise the extent of bare soil.*	Construction
S2	*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.*	Prior to construction / prior to operation
S3	*The photovoltaic arrays will be designed to allow for enough space between rows of panels for establishment of groundcover and implementation of weed controls*	Detailed design
Land use		**SWMP**
LU1	*Land management within the study area will include measures to minimise impacts to surrounding agricultural land use with reference to DPI's publication Infrastructure proposals on rural land (Kovac, M and Briggs, G, 2013). These measures will also be implemented during operation of the project and will include strategies to minimise impacts of aerial spraying. The land management measures will aim to minimise impacts on:* • *land and soil capability within the development footprint* • *biosecurity both at a local and regional level* • *soil erosion* • *surface water runoff*	At all times

ID	Management/ mitigation measure	Management plan/Timing
	• *agricultural activities on neighbouring properties.*	
LU2	*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.*	At all times
LU3	*Consultation will be undertaken with Mid-Western Regional Council, DPIE and other relevant stakeholders including mining and exploration licence holders, and native title claimants in order to identify potential impacts on surrounding land uses and develop measures to address concerns.*	Detailed design/ prior to construction
LU4	*Consultation will continue to be undertaken with participating landholders to minimise disruption to agricultural activities during construction and operation.*	Detailed design/ prior to construction
LU5	*Options will be further investigated to consider the feasibility of grazing within the study area throughout operation, in consultation with landholders.*	Detailed design/ prior to construction
LU6	*A decommissioning and rehabilitation plan will be prepared that outlines the rehabilitation objectives and strategies to return the study area to its pre-existing condition for agricultural land use. This will include but not be limited to:* • *rehabilitation objectives and strategies* • *describing the design criteria of the final land use and landform* • *performance indicators to be used to guide the return of the land back to agricultural production* • *expected timeline for the rehabilitation program.*	Prior to decommissioning
Landscape character and visual		**CEMP**
LCV1	*The design will retain the existing roadside planting where possible along the eastern boundary of the site to reduce the overall visual impact.*	Detailed design

ID	Management/ mitigation measure	Management plan/Timing
LCV2	*Consideration will be given to the colours of the PCUs, the battery facility, O&M buildings and storage shed to ensure minimal contrast and to help blend into the surrounding landscape to the extent practicable.*	Detailed design
LCV3	*Existing vegetation within the environmental exclusion zones will be retained and protected to maintain the existing level of screening.*	Construction/ operation
Noise and vibration		**CEMP**
NV1	*Construction noise and vibration management measures will be implemented consistent with recommendations contained within the ICNG.*	Construction
Traffic and transport		**TMP**
T1	*UPC\AC 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*	Prior to construction Outside Stage 2a scope
T2	*A construction traffic management plan will be prepared in consultation with TfNSW and Mid-Western Regional Council. The plan will include:* • *details of the transport route to be used for all project-related traffic* • *details of any road upgrade works required by Development Consent* • *a protocol for undertaking independent dilapidation surveys to assess the existing condition of the proposed construction routes prior to construction, upgrading or decommissioning activities and the condition of the proposed construction routes following construction, upgrading or decommissioning activities* • *a protocol for the repair of the construction routes if dilapidation surveys identify these roads to be damaged during construction, upgrading or decommissioning works* • *details of the measures that will be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:* • *Temporary traffic controls, including detours and signage*	Prior to construction

ID	Management/ mitigation measure	Management plan/Timing
	• *Notifying the local community about project-related traffic impacts* • *Procedures for receiving and addressing complaints from the community about project related traffic* • *Minimising potential for conflict with school buses, other road users during peak hours and rail services as far as practicable (measures also required during operation of the project)* • *Minimising dirt tracked onto the public road network from project-related traffic* • *Scheduling of haulage vehicle movements to minimise convoy length or platoons* • *Responding to local climate conditions that may affect road safety such as fog, dust and wet weather* • *Responding to any emergency repair or maintenance requirements* • *A traffic management system for managing over-dimensional vehicle trips to and from the project* • *a program to ensure drivers associated with the project receive suitable training on the Driver Code of Conduct and any other relevant obligations under the CTMP* • *a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding* • *controls for transport and use of dangerous goods in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development, Australian Dangerous Goods Code and Australian Standard 4452 Storage and Handling of Toxic Substances.*	
T3	*The safe sight distance analysis undertaken at the Cope Road / Blue Springs Road intersection and at the proposed site access point options from Blue Springs Road will be ground-truthed to determine if vegetation trimming or speed limit reductions need to be applied to provide the required safe sight distance for all vehicle types expected to access the project. Ground-truthing of the analysis undertaken for the emergency-only access point proposed from Barneys Reef Road will also be undertaken, with appropriate measures to be put in place for the (unlikely) event of this access point being utilised.*	Prior to construction Outside Stage 2a scope
T4	*Parking requirements for the project construction and operation workforce will be provide onsite and parking will not be provided on public roads adjacent to the site.*	Prior to construction

ID	Management/ mitigation measure	Management plan/Timing
T5	*A full and detailed assessment will be undertaken by a suitably qualified bridge Engineer of the structural and load capacity of all bridges and culverts on any and all proposed access routes to be used by oversize/over mass vehicles. The assessment reports will be provided to Mid-Western Regional Council for approval prior to commencement of construction.*	Prior to construction
T6	*Pre and post dilapidation reports, with the exception where road upgrades are being undertaken by UPC\AC as part of the project, will be prepared for existing road assets along the proposed transport routes in consultation with Council for each phase of the development (construction, operation, decommissioning).* *Damage to existing road assets caused by the project would be repaired at the full cost of the proponent.*	Prior to construction
T7	*Prior to the commencement of the relevant construction work involving heavy vehicle movements to site, 'Advance truck warning signs' (W5-22 Size B) with distance plates (W8-5 Size B), will be erected adjacent to Cope Road, 250 metres from its intersection with Blue Springs Road. The signs will be removed at completion of construction.*	Prior to construction
T8	*Relevant approvals from the National Heavy Vehicle Regulator and TfNSW will be obtained by the proponent prior to the transportation of any oversize/over mass loads on public roads.*	Prior to construction
T9	*UPC\AC and/or its selected Engineer Procure and Construct (EPC) contractor will work towards a full detailed design for the proposed Blue Springs Road upgrade prior to commencing construction. The full detailed design will be prepared in consultation with Mid-Western Regional Council and Transport for NSW and any other relevant public agencies as part of a Traffic Management Plan and relevant Development Consent conditions.*	Prior to construction Outside Stage 2a scope
T10	*The following traffic management measures will be implemented during construction of the Blue Springs Road upgrade to improve safety of road users along the section of road:* • *implement a temporary lowered sign posted speed limit from 100 kilometres per hour (existing) to 80 kilometres per hour during construction* • *restrict heavy vehicle operation on Blue Springs Road during school bus operation times where possible.*	During construction Outside Stage 2a scope

ID	Management/ mitigation measure	Management plan/Timing
T11	*Consultation with Mid-Western Regional Council will be ongoing regarding the use of the existing cleared area located at the north-western corner of the Cope Road and Blue Springs Road intersection as a potential laydown area/stockpile location during construction of the Blue Springs Road upgrade.*	Prior to construction / construction Outside Stage 2a scope
T12	*UPC\AC will apply for a s138(2) application (under the Roads Act) for the Blue Springs road upgrade with Mid-Western Regional Council, who will refer to Transport for NSW to obtain concurrence prior to the commencement of works.*	Prior to construction Outside Stage 2a scope
T13	*UPC\AC would undertake consultation with landholders affected by the Blue Springs Road upgrade where proposed upgrades impact on land outside of the road reserve. Affected landholders' consent would also be required to continue with the SSD process.*	Prior to construction Outside Stage 2a scope
T14	*UPC\AC commits to preparing a Concept Design for the Blue Springs Road upgrade on the basis of a topographic survey (April/May 2021).*	Detailed design Outside Stage 2a scope
T15	*UPC\AC will work in consultation with Mid-Western Regional Council and affected landholders to re-align the road reserve where it does not match the proposed upgrade section.*	Prior to construction / construction Outside Stage 2a scope
T16	*UPC\AC will continue to consult with State Forestry Commission of NSW throughout development of the proposed Blue Springs Road upgrade. All works in the State Forest area for the proposed Blue Springs Road upgrade would be undertaken in accordance with a forest permit issue by Forestry Corporation of NSW as per section 60 Forestry Act 2012. State Forestry Corporation of NSW has provided its consent to lodge the application.*	Prior to construction / construction Outside Stage 2a scope
Water		**SWMP**
W1	*Infrastructure with the potential to cause pollution to waterways in the event of flooding, such as inverters and battery storage will be located with a minimum 300 mm freeboard above the maximum 1% AEP flood level.*	Detailed design

ID	Management/ mitigation measure	Management plan/Timing
W2	*Solar panels will be designed to provide a minimum of 300 mm freeboard for the lowest edge above the maximum 1% AEP flood level.*	Detailed design
W3	*The panel structure will be designed to withstand the flood velocities expected at the site.*	Detailed design
W4	*No infrastructure will be placed within 20 m of any Strahler 3 or above order streams.*	Detailed design
W5	*All waterway crossings will be designed and constructed in compliance with the Department of Primary Industries, Office of Water, Guidelines for riparian corridors on waterfront land and Guidelines for watercourse crossings on waterfront land.*	Detailed design
W6	*Further flood investigations and hydrological and hydraulic modelling will be carried out where required during detailed design to ensure the flood immunity objectives and design criteria for the project are met. The modelling will be used to define the nature of both main stream flooding and major overland flow across the development footprint under pre- and post- project conditions and to define the full extent of any impact that the project will have on patterns of both main stream flooding and major overland flow.*	Detailed design
W7	*A construction soil and water management plan (CSWMP) will be prepared to outline measures to manage soil and water impacts associated with the construction works, including contaminated land. The CSWMP will provide:* • *measures to minimise/manage erosion and sediment transport both within the construction footprint and offsite including requirements for the preparation of erosion and sediment control plans (ESCP) for all progressive stages of construction Measures to manage waste including the classification and handling of spoil* • *procedures to manage unexpected contaminated finds* • *measures to manage stockpiles including locations, separation of waste types, sediment controls and stabilisation* • *measures to manage accidental spills including the requirement to maintain materials such as spill kits* • *controls for receiving waterways which may include: o Designation of 'no go' zones for construction plant and*	Prior to construction

ID	Management/ mitigation measure	Management plan/Timing
	equipment o Creation of catch/diversion drains and sediment fences at the downstream boundary of construction activities where practicable to ensure containment of sediment-laden runoff • *erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 (Landcom 2004) and Volume 2D (NSW Department of Environment, Climate Change and Water 2008b), commonly referred to as the "Blue Book"*	
W8	*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.*	Construction
W9	*No artificial structures planned to be installed in the creek in the central environmental exclusion zone except for two waterway road and cable crossings. The waterway road and cable crossings would be designed and constructed in compliance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).*	At all times
Hazards and risks		**Bushfire Management Plan**
H1	*A Construction Bushfire Management Plan (BMP) will be prepared in consultation with the Rural Fire Service, and to the satisfaction of the Secretary. The BMP will include the management and mitigation measures described in Section 4.14.1 of the response to submissions report.*	Prior to construction
H2	*An Operation BMP will be prepared in consultation with the Rural Fire Service, and to the satisfaction of the Secretary. The BMP will include the management and mitigation measures described in Section 15.3.3 of the EIS.*	Prior to operation
H3	*A Bush Fire Emergency Management and Evacuation Plan will be prepared consistent with 'Development Planning A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) and Australian Standard AS3745 2010 'Planning for Emergencies in Facilities'. The plan will include:* • *detailed measures to prevent or mitigate fires igniting;*	Prior to construction/ prior to operation

ID	Management/ mitigation measure	Management plan/Timing
	• *work that should not be carried out during total fire bans; availability of fire-suppression equipment,* • *access and water;* • *storage and maintenance of fuels and other flammable materials;* • *notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate; and* • *appropriate bush fire emergency management planning.* *A copy of the plan will be displayed and available for review in a prominent location directly adjacent to the site's main entry point/s.*	
H4	*The operator will contact Mid-Western Local Emergency Management Committee (LEMC) to discuss how the site will be considered under the Mid-Western Local Disaster Plan (DISPLAN).*	Prior to operation
H5	*Prior to construction, a Fire Safety Study will be prepared by a suitably qualified bushfire expert providing full details of the required water storage for fire-fighting requirements. The report will include location and capacity of tanks, methods of pumping to provide sufficient pressures, and details of any proposed internal reticulation or hydrant network.*	Prior to construction
H6	*From the start of building works, the property around all buildings will be managed as an inner protection area for a distance of 50 metres in accordance with the requirements of Appendix 4 of Planning for Bush Fire Protection 2019. Road access to the site, power transmission, fencing and any other services to the site are excluded from this requirement. The following requirements will apply when establishing and maintaining an inner protection area:* • *tree canopy cover should be less than 15% at maturity* • *trees at maturity should not touch or overhang the building* • *lower limbs should be removed up to a height of 2 metres above the ground* • *tree canopies should be separated by 2 to 5 metres* • *preference should be given to smooth barked and evergreen trees*	During construction and operation

ID	Management/ mitigation measure	Management plan/Timing
	• *large discontinuities or gaps in vegetation should be provided to slow down or break the progress of fire towards buildings* • *shrubs should not be located under trees* • *shrubs should not form more than 10% ground cover* • *clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation* • *grass should be kept mown (as a guide grass should be kept to no more than 100mm in height)* • *leaves and vegetation debris should be removed.*	
H7	*UPC\AC will prepare a Fire Safety Study (FSS) for the battery energy storage system in consultation with Fire and Rescue NSW as required under the development consent for the project. The FSS would be prepared prior to construction of the battery energy storage system.*	Prior to Stage 3 construction Outside scope of Stage 2a
H8	*The principles from NFPA 855, AS 5139, IEC 62897, UL 9540, UL95 40A and the FM Global's Development of Sprinkler Protection Guidance for Lithium Ion Based Energy Storage Systems will be considered during detailed design of the BESS, where they are appropriate for the project and feasible.*	Detailed design / prior to construction
Socio-economic		**AES/CEMP**
SIA1	*An Accommodation and Employment Strategy will be developed and implemented for the project in consultation with Mid-Western Regional Council. This strategy will:* • *propose measures to manage workforce accommodation to minimise the effects of non-local hires during construction on short-term accommodation availability and the local housing market* • *include a code of conduct for the projects workforce, particularly to avoid anti-social behaviour at peak construction and align with Mid-Western Regional Council's existing industry agreements* • *to the extent possible and within UPC's control, consider the cumulative impacts associated with other State significant development projects in the area, including nearby mines*	Prior to construction

ID	Management/ mitigation measure	Management plan/Timing
	• *investigate options for prioritising the employment of local workers for the construction and operation of the project, where feasible* • *include a program to report measures undertaken or implemented in line with the strategy include a program to monitor and review the effectiveness of the strategy over the life of the project, including regular monitoring and review during construction.*	
SIA2	*A community benefit share fund will be developed. Funding need will be identified and prioritised based on potential project impacts and in collaboration with Mid-Western Regional Council, the community, and the NSW Government.* *Opportunities may include sponsorship, grant assistance, strategic community partnerships or co-ownership schemes.*	Prior to construction
SIA3	*Investigation will be undertaken into the value of investment in local tertiary training institutions to address skills shortages where identified during the development of the Accommodation and Employment Strategy. Where value is identified and a strategy is defined, investment will be targeted through the community benefit share fund.*	Prior to construction
SIA4	*During development of the Accommodation and Employment Strategy, further consultation with local short-term accommodation providers will be undertaken to identify and where appropriate secure, accommodation for the non-local portion of the construction workforce.*	Prior to construction
SIA5	*During development of the Accommodation and Employment Strategy, further consultation with local employment service providers will be undertaken to identify and where appropriate secure, local hires.*	Prior to construction
Waste and resources		**WMP**
WR1	*A construction waste management plan will be prepared in consultation with Council. The waste management plan will include:* • *details of the quantities of each waste type and the proposed reuse, recycling and disposal locations*	Prior to construction

ID	Management/ mitigation measure	Management plan/Timing
	• *details on measures to reduce the types and volumes of waste* • *measures to maximise reuse and recycling*	
WR2	*All waste generated from the project will be assessed, classified and managed in accordance with the Waste Classification Guidelines (EPA, 2014)*	At all times
WR3	*Wastes will be disposed of at suitable facilities permitted to accept the waste*	At all times
WR4	*Management of wastes will follow the resource management hierarchy principles in accordance with the WARR Act (i.e. avoid > reduce > reuse > recycle > recover > disposal)*	At all times
WR5	*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)*	Construction/ operation
WR6	*General waste bins will be provided for disposal of materials that cannot be cost-effectively recycled*	Construction/ operation
WR7	*The site septic system will be installed and operated in accordance with Council regulations*	Construction/ operation
WR8	*All trucks transporting waste from the site will have covered loads to prevent spillage and other nuisances*	Construction/ operation
WR9	*All materials will be removed from the site following decommissioning and the site will be left waste-free*	Decommissioning
Air quality		**CEMP**
AQ1	*Protocols to minimise air quality impacts will be included in the CEMP*	Prior to construction
AQ2	*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).*	At all times
AQ3	*The traffic management plan will include optimisation of vehicle movements onsite reducing wheel generated dust.*	At all times

ID	Management/ mitigation measure	Management plan/Timing
AQ4	*Dust suppression measures will take into consideration weather, extended dry periods and Mid-Western Regional Council water restriction levels.*	At all times
Cumulative		**CEP**
CU1	*Develop and implement a community and stakeholder engagement plan that includes ongoing consultation with neighbouring operations to manage any cumulative impacts*	Construction/ operation

Appendix D:
RtS report commitments

Commitments from response to submissions (RtS) report

COMMITMENT H3 – BUSH FIRE EMERGENCY MANAGEMENT AND EVACUATION PLAN

A Bush Fire Emergency Management and Evacuation Plan will be prepared consistent with 'Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) and Australian Standard AS3745 2010 'Planning for Emergencies in Facilities'. The plan will include:

- *detailed measures to prevent or mitigate fires igniting*
- *work that should not be carried out during total fire bans*
- *availability of fire-suppression equipment*
- *access and water*
- *storage and maintenance of fuels and other flammable materials*
- *notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate; and*
- *appropriate bush fire emergency management planning.*

COMMITMENT SIA1– ACCOMMODATION AND EMPLOYMENT STRATEGY

An Accommodation and Employment Strategy will be developed and implemented for the project in consultation with Mid-Western Regional Council. This strategy will:

- *consider various workforce scenarios assuming the construction period overlaps with other major projects and considering peak tourism activity*
- *include detailed information regarding the number of beds and types of accommodation to be-utilised monthly for the period of construction.*

COMMITMENT WR1– CONSTRUCTION WASTE MANAGEMENT PLAN

A construction waste management plan will be prepared in consultation with Mid-Western Regional Council. The waste management plan will include:

- *details on how the waste will be transported to disposal locations during construction and decommissioning*

UPC\AC will continue to consult with Mid-Western Regional Council around specific details of the waste management strategy throughout the life of the project.

COMMITMENT H5– FIRE SAFETY STUDY

Prior to construction, a Fire Safety Study will be prepared by a suitably qualified bushfire expert providing full details of the required water storage for fire-fighting requirements. The report will include location and capacity of tanks, methods of pumping to provide sufficient pressures, and details of any proposed internal reticulation or hydrant network.

Appendix E: Legislation and planning documents

Table E1 Key legislation, regulations and planning instruments

Statutory reference	Description (from Ramboll 2020)
State legislation and regulations	
Environmental Planning and Assessment Act 1979	The NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and EP&A Regulation provide the framework for environmental planning and assessment in NSW. Environmental planning instruments (EPIs) are established under the EP&A Act to regulate land use and development. EPIs determine the relevant part of the EP&A Act under which a development project must be assessed and therefore determine the need or otherwise for development consent. EPIs consist of SEPPs, regional environmental plans (REPs), and local environmental plans (LEPs).
Roads Act 1993	The NSW *Roads Act 1993* (Roads Act) is administered by Transport for NSW (previously Roads and Maritime Services (RMS)), local government or the Minister as delegated under the NSW Crown Land Management Act 2016 (CL Act). Transport for NSW has jurisdiction over major roads, local government over minor roads and the Minister over Crown roads. The Roads Act sets out the rights of the public in regard to access to public roads.
Biodiversity Conservation Act 2016	The NSW *Biodiversity Conservation Act 2016* (BC Act) establishes the regulatory framework for assessing and offsetting biodiversity impacts for proposed developments. The BC Act is also supported by the *Biodiversity Conservation Regulation 2017 (BC Regulation)* and the *Biodiversity Conservation (Savings and Transitional) Regulation 2017*, which outline the methods to be used in applying the Biodiversity Assessment Methodology (BAM).
Fisheries Management Act 1994	The NSW *Fisheries Management Act 1994* (FM Act) governs the management of fish and their habitat within NSW and is administered by the Department of Primary Industries (DPI). The FM Act aims to conserve 'key fish habitats' (KFH) which includes aquatic habitats that are important to the maintenance of fish populations, the survival and recovery of threatened aquatic species and the sustainability of the recreational and commercial fishing industries.
Biosecurity Act 2015	The objective of the NSW *Biosecurity Act 2015* (BSA Act) is to provide a framework for the prevention, elimination and minimisation of biosecurity risks within NSW. The BSA Act outlines priority weeds that pose a risk to reducing the diversity of native plant and animal species. Under Schedule 1 of the Act all private landowners, occupiers, public authorities and Councils are required to control weeds on their land. Mid-Western Regional Council is the Local Control Authority responsible for administering the BSA Act in the region that applies to the study area.
National Parks and Wildlife Act 1974	The NSW *National Parks and Wildlife Act 1974* (NP&W Act) governs the management of national parks, historic sites, nature reserves, reserves, Aboriginal areas and state game reserves in NSW. The NP&W Act also provides for the protection of native flora and fauna.

Statutory reference	Description (from Ramboll 2020)
	The study area is not located within 10 kilometres of any nature reserve or forest protected under the NP&W Act.
Heritage Act 1977	The NSW *Heritage Act 1977* (Heritage Act) aims to protect and conserve the natural and cultural history of NSW, including scheduled heritage items, sites and relics. The Act defines 'environmental heritage' as those places, buildings, works, relics, moveable objects and precincts listed in the Local or State Heritage Significance register. A property is a heritage item if it is listed in the heritage schedule of the local Council's LEP or listed on the State Heritage Register (SHR), a register of places and items of particular importance to the people of NSW.
Water Management Act 2000	The NSW *Water Management Act 2000* (WM Act) regulates the use and interference of surface and groundwater in NSW where a water sharing plan has been implemented. The WM Act is progressively being implemented throughout NSW to manage water resources, superseding the Water Act 1912.
Crown Lands Management Act 2016	The NSW *Crown Lands Management Act 2016* sets out how Crown land is to be managed. In particular, specific use of Crown land generally needs to be authorised by a lease, licence or permit. Under Part 3 of the Act, the Minister for Lands must be satisfied that the land has been assessed in accordance with the principles of Crown land management by (amongst other matters) including an assessment of the capabilities of Crown land and the identification of suitable land uses.
Protection of the Environment Operations Act 1997	The NSW *Protection of the Environment Operations Act 1997* (POEO Act) is the principal NSW environmental protection legislation and is administered by the NSW Environment Protection Authority (EPA). Section 48 of the POEO Act requires an environment protection licence (EPL) to undertake scheduled activities at a premise.
Rural Fires Act 1997	The NSW *Rural Fires Act 1997* (RF Act) aims to prevent, mitigate, and suppress bush and other fires. Section 63(2) of the RF Act requires the owners of land to prevent the ignition and spread of bushfires on their land. Under Section 4.41 of the EP&A Act, a bush fire safety authority under Section 100B of the RF Act is not required for SSD that is authorised by a development consent
Local Land Services Act 2013	The NSW *Local Land Services Act 2013* (LLS Act) provides framework for the management of local land services and includes the requirement to obtain approval under Part 5A of the LLS Act to remove native vegetation in a regulated rural area. Pursuant to Section 60O of the LLS Act, clearing of native vegetation in a regulated rural area is authorised under Part 4 of the EP&A Act and an authorisation for clearing of native vegetation is not required for the project under the LLS Act.
Conveyancing Act 1919	The development footprint extends over many adjoining properties, each of which require a separate lease from the owners of the affected land. Lease of a solar farm site is treated as a lease of premises, regardless of whether the lease will be for more or less than 25 years. The plan defining 'premises' (being the development footprint) will not

Statutory reference	Description (from Ramboll 2020)
	constitute a 'current plan' within the meaning of Section 7A *Conveyancing Act 1919* (Conveyancing Act) and therefore will not require subdivision consent under Section 23G Conveyancing Act.
Mining Act 1992	The main objective of the NSW *Mining Act 1992* (Mining Act) is to encourage and facilitate the discovery and development of mineral resources in NSW, having regard to the need to encourage ecologically sustainable development.
Waste Avoidance and Resource Recovery Act 2001	The NSW *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) includes resource management hierarchy principles to encourage the most efficient use of resources and to reduce environmental harm.
Commonwealth legislation	
Environment Protection and Biodiversity Conservation Act 1999	The Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the core piece of legislation protecting Matters of National Environmental Significance (MNES) and Commonwealth land.
Native Title Act 1993	The *Native Title Act 1993* (Native Title Act) was enacted to formally recognise and protect native title rights in Australia. The Native Title Act establishes processes to determine where native title exists, how future activity affecting upon native title may be undertaken, and to provide compensation where native title is impaired or extinguished. Where a native title claimant application is made with the National Native Title Tribunal (NNTT), the Federal Court or High Court of Australia make a determination of whether native title does or does not exist in relation to the claim.
Environmental planning instruments	
State Environmental Planning Policy (State and Regional Development) 2011	The State Environmental Planning Policy (SEPP) (State and Regional Development) 2011 determines that the project is classified as an SSD.
State Environmental Planning Policy (Infrastructure) 2007	The SEPP (Infrastructure) 2007 allows for the development of solar farm projects with consent even on land prescribed for primary production.
State Environment Planning Policy No. 33 (Hazardous and Offensive Development)	State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33) requires that a preliminary hazard assessment (PHA) be prepared in accordance with the current circulars or guidelines for potentially hazardous or offensive development.
State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55)	State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55) provides a State-wide planning approach to the remediation of contaminated land and aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human and environmental health. Clause 7 of SEPP 55 requires that a

Statutory reference	Description (from Ramboll 2020)
	consent authority take into consideration whether the land is contaminated prior to issuing development consent.
State Environmental Planning Policy (Primary Production and Rural Development) 2019	The State Environmental Planning Policy (Primary Production and Rural Development) 2019 (SEPP PP&RD) aims to facilitate the orderly and economic use and development of rural lands for primary production related purposes and reduce land use conflict and sterilisation of rural lands.
State Environmental Planning Policy – Koala Habitat Protection 2019 (now – Koala Habitat Protection 2020 and 2021)	The State Environmental Planning Policy (Koala Habitat Protection) 2019 (SEPP Koala Habitat) aims to encourage the proper conservation and management of areas of natural vegetation that provide habitat for koalas. It applies to land to which an approved koala plan of management applies or land identified on the Koala Development Application Map and with an area of greater than 1 ha (including adjoining land within the same ownership), and in LGAs listed in Schedule 1 of SEPP Koala Habitat.
State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007	The State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007 (SEPP Mining) is designed to provide for the proper management and development of mineral, petroleum and extractive material resources and establish appropriate planning controls to encourage ecologically sustainable development through environmental assessment and management.
Mid-Western Regional Local Environmental Plan 2012	The project is located entirely within the Mid-Western Regional Council LGA and is subject to the Mid-Western Regional Local Environmental Plan 2012 (LEP). The study area is zoned as 'Primary Production (RU1)' under the LEP.
Development control plans	
Mid-Western Regional Development Control Plan 2013	The Mid-Western Regional Development Control Plan 2013 (the DCP) compliments the Mid-Western Regional Local Environmental Plan 2012 (the LEP) and provides detailed requirements to guide development in the Mid-Western Regional Council LGA. The DCP was adopted by Mid-Western Regional Council on 6 February 2013 and commenced operation on 11 February 2013. Amendment 4 to the plan was adopted on the 19 June 2019 and commenced operation on 21June 2019.

Appendix F:
Guidelines and standards

Guidelines and standards

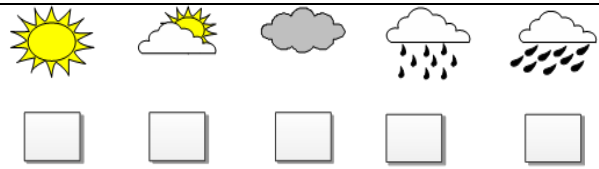
The following guidelines and standards have been extracted from Appendix A Applicable Legislative Requirements, from the Stubbo Solar Principal's Project Requirements Part A - Project Overview.

Australian Standard (AS) 2601-2001: The Demolition of Structures

- AS 1547-2012 *On-site domestic wastewater management*
- AS 1940-2017 *The Storage and Handling of Flammable and Combustible Liquids*
- Building Code of Australia
- Independent Audit Post Approval Requirements (NSW Government 2020)
- International Erosion Control Association Australia (IECA) *Best Practice Erosion and Sediment Control*
- ISO 31000 *Risk Management - Principles and Guidelines on Implementation*

Appendix G:
Examples of HSE inspection checklists

Environmental Inspection Checklist

Inspected by:			
Inspection date:		**Time:**	
Location/chainage:			
Rain in the last 24hrs (mm)?		**Weather conditions** **(tick one of the following icons):**	

Environmental Protection Measure	Compliance?		Description of Action (if required)	Action Risk Rating[1]				Completion Signoff
	Yes	No		1	2	3	4	
General								
The site is generally in a tidy condition	☐	☐		☐	☐	☐	☐	
All materials and equipment are contained within the project boundary	☐	☐		☐	☐	☐	☐	
All works are undertaken within the project boundary	☐	☐		☐	☐	☐	☐	
Designated haulage routes and access points are being used	☐	☐		☐	☐	☐	☐	
Risk assessments include relevant environmental hazards and controls	☐	☐		☐	☐	☐	☐	

Environmental Inspection Checklist

Weekly Safety Station inspections to be conducted – first aid, snake kits and emergency equipment	☐	☐		☐	☐	☐	☐	
Office first aid kits to be inspected **Monthly**	☐	☐		☐	☐	☐	☐	
Weekly inspection of eye wash station – include cleaning of facility	☐	☐		☐	☐	☐	☐	
Daily Trench inspections to be conducted and documented	☐	☐		☐	☐	☐	☐	
Soil and Water Management								
All clean water diversion drains are stable	☐	☐		☐	☐	☐	☐	
Sediment fence is installed correctly and there are no gaps	☐	☐		☐	☐	☐	☐	
Disturbed areas where no works are undertaken are properly covered or stabilised	☐	☐		☐	☐	☐	☐	
There are no areas of potential or actual concentrated flow that do not flow to sediment controls.	☐	☐		☐	☐	☐	☐	
Check dams are used within diversion drains where required to slow flows down and minimize erosion within the drains	☐	☐		☐	☐	☐	☐	
Stockpiles are sited in low-hazard areas clear of watercourses and	☐	☐		☐	☐	☐	☐	
Stockpiles are less than 2m in height	☐	☐		☐	☐	☐	☐	

Environmental Inspection Checklist

Sediment control measures are constructed as close to the potential source of sediment as possible	☐	☐		☐	☐	☐	☐	
Shakers, rubble pads or wash down areas have been installed	☐	☐		☐	☐	☐	☐	
There is no mud on the roads outside of the project boundary	☐	☐		☐	☐	☐	☐	
All discharges are undertaken in accordance with dewatering requirements	☐	☐		☐	☐	☐	☐	
Temporary toilets are in good working order with no leaks and checked weekly	☐	☐		☐	☐	☐	☐	
Water taps, hoses and pipes in working order with no visible leaks	☐	☐		☐	☐	☐	☐	
All water sources are approved for use	☐	☐		☐	☐	☐	☐	
All erosion and sediment controls are correctly installed and maintained	☐	☐		☐	☐	☐	☐	
Daily – sediment and erosion controls to be inspected for wildlife (E11.5)	☐	☐		☐	☐	☐	☐	
	☐	☐		☐	☐	☐	☐	
	☐	☐		☐	☐	☐	☐	

Environmental Inspection Checklist

Noise/Air Quality/Dust Management								
No visible dust leaving the Project boundary	☐	☐		☐	☐	☐	☐	
Dust suppression, i.e. water cart, is being used to minimize dust emissions	☐	☐		☐	☐	☐	☐	
Conduct health surveillance at identified sensitive receptors – ref. Noise Impact Assessment.	☐	☐	Conducted by LSBP: Tranex Noise Assessment 22/04/2021	☐	☐	☐	☐	
Ensure all plant & equipment used is in good working order - not causing excessive noise.	☐	☐		☐	☐	☐	☐	
Vehicle exhaust are free from black smoke or significant visual emissions	☐	☐		☐	☐	☐	☐	
All works are restricted to the specified hours of operation.	☐	☐		☐	☐	☐	☐	
	☐	☐		☐	☐	☐	☐	
Heritage Management								
Weekly – Heritage/No Go Zones are known to site personnel – fenced and signed. Inspection to be documented in SMC	☐	☐		☐	☐	☐	☐	
Vegetation Management								
Clearing limits and work boundaries are established and well defined	☐	☐		☐	☐	☐	☐	

Environmental Inspection Checklist

Clearing and grubbing works are undertaken in accordance with Clearing and Grubbing Permits	☐	☐		☐	☐	☐	☐	
Exclusion fencing around trees and sensitive areas is intact	☐	☐		☐	☐	☐	☐	
No visible weed infestation	☐	☐		☐	☐	☐	☐	
Fauna Management								
Boundary fencing is installed to prevent access	☐	☐		☐	☐	☐	☐	
Wildlife handlers identifiable & contactable	☐	☐		☐	☐	☐	☐	
Daily – trench inspections will be conducted	☐	☐		☐	☐	☐	☐	
	☐	☐		☐	☐	☐	☐	
Waste Management and Storage of Hazardous Materials								
All chemicals on site have a valid SDS (<5 yrs. old) and available	☐	☐		☐	☐	☐	☐	
Spill response equipment on site is relevant for the works and available for all crews – readily accessible and fully stocked	☐	☐		☐	☐	☐	☐	
Drip trays are readily available for use during refueling								
Fire extinguisher is stored within 5m of refueling, is within inspection date								
All chemicals are correctly stored including appropriate segregation and bunds are free from rubbish or wastewater	☐	☐		☐	☐	☐	☐	

Environmental Inspection Checklist

Applicable PPE is available and being worn when chemicals are in use	☐	☐		☐	☐	☐	☐	
Waste drums/IBCs are emptied or disposed of regularly	☐	☐		☐	☐	☐	☐	
Wastes are segregated in designated containers	☐	☐		☐	☐	☐	☐	
Concrete washouts are properly set-up and signposted	☐	☐		☐	☐	☐	☐	
Fuel/chemicals stored in bunded areas free from rubbish and/or wastewater	☐	☐		☐	☐	☐	☐	
SDS are available for chemicals stored on site.	☐	☐		☐	☐	☐	☐	
No oil leaks or spills visible on site	☐	☐		☐	☐	☐	☐	
Refueling in designated areas	☐	☐		☐	☐	☐	☐	
	☐	☐		☐	☐	☐	☐	
Fire Management								
Adequate firefighting equipment is available	☐	☐		☐	☐	☐	☐	
Daily - Hot works permits are available and registered	☐	☐		☐	☐	☐	☐	
During hot weather, fire restrictions are monitored and communicated to work crews and audited for compliance	☐	☐		☐	☐	☐	☐	
	☐	☐		☐	☐	☐	☐	

Environmental Inspection Checklist

	☐	☐		☐	☐	☐	☐	
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Action Risk Rating

Action Risk Rating	Risk Level	Priority*	Examples
1	Extreme	Immediately - must be closed out on the day of inspection	• Any actual or potential non-compliance with any Development Consent • Adverse weather conditions are predicted that may result in above if controls are not adequate
2	High	Within 24hrs	• Critical controls are damaged and need to be reinstated before a rain event
3	Medium	Within 3 Working Days	• Dewatering of sediment basins required
4	Low	Within 5 Working Days	• Stockpiles need to be stabilised

Weekly Site Safety Walk

SITE INSPECTION & FIELD AUDIT VERIFICATION

LOCATION: **TIME:** **DATE:**

SWMS REVIEW	YES	NO	N/A	COMMENTS
Has the SWMS been developed specifically for the task?				
Have new work scopes or changes to the work scope been adequately identified and controlled?				
Has the SWMS been adequately risk assessed?				
Have all the employees & subcontractors working on the task signed onto the SWMS?				
Is the SWMS located in a position to ensure it is available to all persons requiring access to worksite?				
Does the SWMS identify Permit to work or Isolation requirements?				
Are any chemicals present and have SDS been identified on the SWMS and are they available at the worksite?				
Does the SWMS identify and control any potential environmental issues and have these issues been adequately controlled?				
PSI REVIEW	**YES**	**NO**	**N/A**	**COMMENTS**
Is the PSI available at the work front?				
Has the PSI been developed for the specific task and been completed at the work front?				
Are the hazards identified on the PSI adequate for the task being undertaken?				
Are the controls for these hazards sufficient for the task to be completed safely?				
Has any additional PPE requirements been identified on the PSI and are they being utilized?				
Can work crew identify the nearest muster point?				
Have all workers and subcontractors working on the task signed onto the PSI				
Have all workers and subcontractors initialled the PSI after each break?				
Has the supervisor signed off the PSI?				

Weekly Site Safety Walk

FIELD OBSERVATIONS	Yes	No	N/A	COMMENTS
Are correct manual handling practices being observed?				
Has all correct PPE been selected and used as per site policy?				
Has the correct tools/equipment been selected for observed tasks?				
Does any plant/machinery observed have a completed daily prestart?				
Are machine no go zones being observed? (spotters/workers)				
Are all trenches/excavations adequately flagged/barricaded?				
Is site signage being adhered to?				
Are positive comms being observed on site?				
Is site generally tidy and free of waste?				
Is rubbish being disposed of in accordance to site policy? Waste segregated?				
Are site speed limits being adhered to?				
Are all silt/sediment fencing fit for purpose and no visible gaps?				
Are designated haulage and access routes being utilized?				
Is sediment fencing installed correctly with no gaps?				
Are site **NO GO** areas flagged and sign posted? Exclusion fencing around trees and sensitive areas intact?				
Is there no visible dust leaving the site boundary?				
Are there any visible leaks or spills observed on site?				
Are there adequate spill kits available on site?				
Are safety stations easily recognisable and adequately stocked?				
Are all fire extinguishers observed tagged in date?				

CONTROL ACTIONS				
	Action Required	Action / Report Number (if action is not addressed immediately)	Responsible Person	Completion Date: (to be dated and initialled by AT if rectified immediately)
1	Sediment fencing on southern boundary			
2	Barricading – all barricading on site to be no less than 1m from edge of excavations			
3	General Housekeeping – concrete waste			
4	Fencing to be removed near Wintle Way			
5	General Housekeeping – plastics/aerosol			
6				
7				
8				
9				

Weekly Site Safety Walk

AUDIT TEAM (AT)		
Name:	Company:	Signature:
LAURENCE BEER	LSBP	
JENNY KLEASE	PLC	
LES KEALL	PSD	
LESLIE SOOS	TRANEX	

PHOTO EVIDENCE

Health, Safety and Environmental Inspection Checklist

Project #*:		**Date*:**	**Time*:**
Project Name*:		**Status:**	
Inspection Location:		**Previous Inspection Reviewed*:**	
Company Conducting Inspection*:			
Weather Conditions*:			
Lighting*:			
Inspection Type*:			
INSPECTION TEAM	**COMPANY**	**PRINT**	**SIGN**
Lead Inspector*:			
Inspector:			
PROJECT SUPERVISORS	**COMPANY**	**PRINT**	**SIGN**
Superintendent*:			
Project Manager*:			
Lead Inspector's Supervisor*:			

POSITIVE OBSERVATIONS	
1	**Positive Observation Category:***
	Positive Observation Standard:*
	Company Involved:*
	Supervisor Involved:
	Person Involved:
	Positive Example:
	GPS Location:
	Attachments:

HAZARDS			
1	Hazard Rating*:		Active Hazard Category*:
	Hazard Standard*:		
	Company Involved*:		
	Supervisor Involved*:		Person Involved:
	Hazard Notes:		
	GPS Location:		
	Attachments:		
	Corrective Actions*:		
	1	Assigned to*:	
		Notes:	
		Corrective Action*:	
		Target Date*:	Completed Date:
		Supervisor To Notify:	
ATTACHMENTS			

Daily HSE Notification

Project:		**Date:**	

Weather Today

Daily Safety Message
General Business
Current Hazards
Activities on site today

Safety Notifications

Appendix H:
DPE review comments and ACEN responses

Planning, Industry & Environment

Document: Environnemental Management Strategy (EMS)
Revision: Version 6 dated 7 June 2023 and Version 7 dated 21 June 2023
Reviewed: Katie Weekes on 14 June 2023 and 23 June 2023

		Editorial note: Blue text = DPE comments following Applicant response 21 June 2023, Revision 7.		
Obligation to Minimise Harm to the Environment, Condition 1, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	Yes	Section 1.3 addresses this condition.	-	-
Obligation to Minimise Harm to the Environment, Condition 2, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.*	Yes	Addressed in Section 2.	-	-
Obligation to Minimise Harm to the Environment, Condition 3, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Yes	Addressed in Section 2.	-	-
Terms of Consent, Condition 4, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:	Yes	This condition is addressed in Section 5.10.1.	-	-
(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				

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(c) the implementation of any actions or measures contained in these documents.				
Upgrading of Solar Panels and Ancillary Infrastructure, Condition 5, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Yes	This condition is addressed in Section 5.10.2.		
Structural Adequacy, Condition 6, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.*	Yes	This condition is addressed in Section 5.10.3.	-	-
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.*				
Demolition, Condition 7, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Yes	This condition is addressed in Section 5.10.4.	-	-
Protection of Public Infrastructure, Condition 8, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
Unless the Applicant and the applicable authority agree otherwise, the Applicant must:	Yes	This condition is addressed in Section 5.10.5.	-	-

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(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.				
Operation of Plant and Equipment, Condition 9, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Yes	This condition is addressed in Section 5.10.6.	-	-
Subdivision, Condition 10, Schedule 2	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.*	Partial Yes	Table B1 states this condition is outside the scope of Stage 2a. Confirm this is still the case given the letter that was submitted regarding clarification of subdivision area (PA-20). Resolved, Table B1 updated.	Confirm this is still outside the scope of Stage 2a given the letter regarding subdivision. Resolved	Table B1 is updated
Land Management, Condition 12, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must maintain the agricultural land capability of the site, including:	NA	This condition is addressed in the CEMP.	-	-
(a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading;				

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(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.	-	-	-	-
Vegetation Clearance*, Condition *13, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	NA	This condition is addressed in the BMP.	-	-
Noise, Condition 17, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must:	NA	This condition is addressed in the CEMP.	-	-
(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.				
Dust, Condition 18, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must minimise the dust generated by the development.	NA	This condition is addressed in the CEMP.	-	-
Visual, Condition 19, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must:	NA	This condition is addressed in the CEMP.	-	-
(a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection;				

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(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.				
Lighting, Condition 20, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must:	NA	This condition is addressed in the CEMP.	-	-
(a) minimise the off-site lighting impacts of the development; and				
(b) ensure that any external lighting associated with the development: • 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.				
Water Supply, Condition 24, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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*.	NA	This condition is addressed in the SWMP.	-	-
Water Pollution, Condition 25, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	NA	This condition is addressed in the SWMP.	-	-
Operating Conditions, Condition 26, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**

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The Applicant must:	NA	This condition is addressed in the SWMP.	-	-
(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 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.				
Storage and Handling of Dangerous Goods Condition 29, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:	NA	This condition is addressed in the SWMP.	-	-
(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.				
Operating Conditions, Condition 30, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**

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The Applicant must:	NA	This condition is addressed in the EP and Bushfire MP.	-	-
(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 Protection Zones; • 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.				
Waste, Condition 32, Schedule 3	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Applicant must:	NA	This condition is addressed in the Waste MP sub-plan.	-	-
(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 its classification;				
(d) not receive or dispose of any waste on site; and				

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<table>
<tr><td>(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.</td><td></td><td></td><td></td><td></td></tr>
<tr><th>Decommissioning and Rehabilitation, Condition 34, Schedule 3</th><th>Sufficient (Yes/No/Partial)</th><th>Document reference and comment</th><th>Action Required</th><th>Company Response</th></tr>
<tr><td>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.
Table 4: Rehabilitation Objectives
<table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Site</td><td>• Safe, stable and non-polluting
• Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</td></tr><tr><td>Solar farm infrastructure</td><td>• To be decommissioned and removed, unless the Planning Secretary agrees otherwise</td></tr><tr><td>Land use</td><td>• Restore land capability to pre-existing use</td></tr><tr><td>Community</td><td>• Ensure public safety at all times</td></tr></table></td><td>NA</td><td>Outside Stage 2a scope.</td><td>-</td><td>-</td></tr>
<tr><th>Environmental Management Strategy, Condition 1, Schedule 4</th><th>Sufficient (Yes/No/Partial)</th><th>Document reference and comment</th><th>Action Required</th><th>Company Response</th></tr>
<tr><td>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:</td><td>Partial
Yes</td><td>This EMS.
Appendix B, Table B1 lists the relevant conditions from the consent.
For this condition in Table B1, there is no detail on where each of the conditions is addressed in the document.
Resolved, Table B1 updated.</td><td>More information is required in Table B1 for this condition detailing where each point is addressed in the EMS. Resolved</td><td>Table B1 updated</td></tr>
<tr><td>(a) provide the strategic framework for environmental management of the development;</td><td>Partial
Yes</td><td>Section 5 addresses the environmental management framework.
Figure 1.2 provides the environmental management documentation structure/interactions.
Section 5.6 describes the environmental management system.
Given this section seems to describe the process/overarching guide that is followed for the development of the documents that fit within the</td><td>Provide additional details on the environmental management system as detailed in Section 5.6.</td><td>Sections updated</td></tr>
</table>

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		environmental management system, wouldn't this be better placed earlier in the document or at the start of Section 5? Are the management plans and strategies all set out with a similar structure as shown in Figure 5.10 to ensure consistency with the environmental management system? Thought that use of 'HSEMP' was being replaced with 'safety and environmental management system' to avoid confusion – see comments on previous version of EMS. Resolved, Section 5.6 updated.	Confirm use of 'HSEMP'. Resolved	
(b) identify the statutory approvals that apply to the development;	Partial Yes	Section 2 addresses statutory requirements. It is unclear how the legislation detailed in Appendix E is relevant to the project as it only provides a general description of each. Resolved, Section 2.3 updated.	Provide additional detail on how the legislation detailed in Appendix E is relevant to the project. Resolved	Clarification provided in Section 2.3
(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Partial Partial	Addressed in Section 5.5. See comments in Section 5.5 of marked-up pdf. Unresolved. Section 5.5.1, is there an ACEN HSE Manager as well as a Health and Safety Advisor? Section 6.5 lists an ACEN HSE Manager. Section 5.5.5, Health, Safety and Environment Manager for Transgrid, are they also responsible for implementing environmental training as well as safety training? Figure 5.6 details the project organisational structure. ACEN is the Applicant and has not been included in the organisational structure for their project. Resolved Figure 5.6 suggests that PCL and TransGrid will communicate with each other, but it is not clear which	Address comments in Section 5.5 of marked-up pdf. Unresolved, confirm if there is an ACEN HSE Manager. Confirm if the Transgrid HSE Manager also implements environmental training. Include ACEN in the	Organisational structure for EMS and PCL updated s6.5 revised to refer to ACEN HSE Advisor s5.5.5 amended to include environmental training

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		representative(s) from each organisation will be responsible for this. Resolved Will there be regular meetings between the 3 parties to ensure that all aspects of the consent and project are being addressed? Resolved	organisational structure for the EMS. Provide further detail on how the 3 parties will communicate to ensure that all aspects of the consent are addressed. Resolved	
(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;	Partial Yes	Addressed in Section 7.4, dissemination of environmental information. Ensure this is consistent with the information provided in the CEP, particularly Section 6.5 and 6.6. It can be a summary of this section of the CEP, but should ensure that it adequately describes the consultation tools that will be used during the course of the project to inform both the local community and relevant agencies (MWRC, DPE, TfNSW etc). Resolved, Section 7.4 updated.	Ensure this is consistent with the CEP, particularly Section 6.5 and 6.6. Resolved	Section updated to be consistent with CEP
• receive, handle, respond to, and record complaints;	Partial Yes	Addressed in Section 8.1. Ensure consistency with Section 6.7 of CEP and vice versa. Insufficient detail on roles and responsibilities – see marked-up pdf. Unclear how the complaint procedure in the EMS and CEP relates to the procedure provided in Appendix B of the CEP, including commitments to timeframes. Is there one complaint register or three separate ones?	Address comments in Section 8 of marked-up pdf. Clarify how the complaint procedure in the EMS and CEP relates to the procedure provided in Appendix B of	Section updated to be consistent with CEP Community information updated as per comments.

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		Also note that the website needs updating as it is not listing the community information line as detailed in Section 8.2 of the EMS. In addition, there is a link to the ACEN complaints procedure which is different to the one provided. How confident are you that a complaint made to this Section 8.2, PCL link will reach the appropriate person in PCL to be addressed in an appropriate timeframe given Australia isn't listed as a region and 'complaint' isn't an option for inquiry. Resolved, Section 8.1 and Section 8.2 updated.	the CEP, including commitments to timeframes. Check website information and ensure it is up to date and consistent with the EMS. Resolved	
• resolve any disputes that may arise;	Yes	Addressed in Section 8.4.	-	-
• respond to any non-compliance;	Yes	Addressed in Section 6.2.2.	-	-
• respond to emergencies; and	Partial Yes	Addressed in Section 5.8, Emergency Plan and Bushfire Management Plan. What about ACENs responsibilities and actions? There is no mention of ACEN in Section 5.8. What sort of details? Contact details? Including type and locations of emergency equipment? Does the emergency preparedness also cover flood response? Resolved, Section 5.8 updated.	Include additional information in Section 5.8 as requested. Resolved	Comments in the marked-up pdf addressed
(c) include:	-	-	-	-
• references to any plans approved under the conditions of this consent; and	Yes	Addressed in Section 1.1. Figure 1.2 details the relationship of the EMS to other plans required for the construction of the project. Section 4 describes the EMS structure, including management plans and subplans that fall under the EMS.	-	-
• a clear plan depicting all the monitoring to be carried out in relation to the development.	Partial Yes	Addressed in Section 6.1 and CEMP (as detailed in Appendix B conditions of consent). This condition requires a clear plan depicting all the monitoring to be carried out in relation to the development. This is designed to provide a summary of all the monitoring required in relation to the project.	Include clearer reference (such as section number) to relevant section of the CEMP	table 6.1 from CEMP was added under section 6.1 of EMS

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		While sections 6.1.1 and 6.1.2 indicate that this information is provided in the CEMP, it is unclear, particularly from the wording in Section 6.1. Resolved, Section 6.1.2 updated to include Table 6.1 which summarises the site inspection and monitoring frequency.	that contains the monitoring summary tables. Resolved	
Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	Partial Yes	Section 5 discusses implementation of the EMS and commitment from PCL and TransGrid. There is no commitment from ACEN as the Applicant to implement the EMS. Resolved, Section 5 updated.	Include commitment from ACEN to implement the EMS. Resolved	EMS Section 5 updated
Revision of Strategies, Plans and Programs, Condition 2, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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	Yes	Addressed in Section 6.5.	-	-
(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.	Yes	Addressed in Section 6.5.	-	-
Updating and Staging of Strategies, Plans or Programs, Condition 3, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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	Yes	Section 1, staging has been requested under this condition.	-	-

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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.*				
Notification of Department, Condition 4, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Yes	Addressed in Section 7.2.	-	-
Incident Notification, Condition 7, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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	Partial Partial	Section 6.2.1 references this condition. Section 6.2.1, including Table 6.1, are not consistent with the consent and definitions in the consent.	Revise Section 6.2.1 and Table 6.1 to be consistent with	Section 6.2.1 and Table 6.1 amended to be consistent with

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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.		Unresolved. Section 6.2.1, particularly Table 6.1 not consistent with the definitions and requirements in the consent.	the conditions of consent. Unresolved, As discussed, update Section 6.2.1 and Table 6.1 to be revised to be consistent with the definitions and requirements of the consent.	the conditions of consent. s6.2.1 revised and Table 6.1 amended
Non-Compliance Notification, Condition 8, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Yes	Section 6.2.2 addresses this condition.	-	-
Non-Compliance Notification, Condition 9, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Partial Yes	Section 6.2.2 addresses this condition. Third paragraph, in accordance with condition 8 and 9, the non-compliance notification is to the Planning Secretary, not ACEN. Resolved, Section 6.2.2 updated.	Revise Section 6.2.2, third paragraph, to notify the Planning Secretary of these items, not ACEN. Resolved	Amended as required
Non-Compliance Notification, Condition 10, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Yes	Section 6.2.2 addresses this condition.	-	-
Independent Environmental Audit, Condition 11, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**

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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	Yes	Addressed in Section 6.3.	-	-
(b) within 3 months of commencement of operations.	NA	-	-	-
Independent Environmental Audit, Condition 12, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	No Yes	Section 6.3 addresses monitoring requirements, however, does not commit to this condition. Resolved, Section 6.3 updated.	Commit to this condition. Resolved	Condition committed to
Independent Environmental Audit, Condition 13, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	No Yes	Section 6.3 addresses monitoring requirements, however, does not commit to this condition. Resolved, Section 6.3 updated.	Commit to this condition. Resolved	Condition committed to
Independent Environmental Audit, Condition 14, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:	Partial Partial	Section 6.3 commits to commissioning an IEA in accordance with this document. More specifically, the independent audit will be carried out in accordance with the specific requirements of this document, not just commissioned. Unresolved, Section 6.3 has not been updated to clarify this point.	Commit to the requirements of this condition.	Condition committed to Commitment committed to in full
(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;	Partial Yes	No commitment to this condition. Resolved, Section 6.3 updated.	See above. Resolved	Condition committed to
(b) submit the response to the Planning Secretary; and	Partial Yes	No commitment to this condition. Resolved, Section 6.3 updated.	See above. Resolved	Condition committed to

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(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.	No Yes	No commitment to this condition, including timeframe. Resolved, Section 6.3 updated.	See above. Resolved	Condition committed to
Independent Environmental Audit, Condition 15, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	No Yes	No commitment to this condition, including timeframe. Resolved, Section 6.3 updated.	See above. Resolved	Condition committed to
Independent Environmental Audit, Condition 16, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	NA	-	-	-
Access to information, Condition 17, Schedule 4	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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; • 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;	Yes	Addressed in Section 7.3.	-	-

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• 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.	Yes	Addressed in Section 7.3.	-	-
Written Incident Notification Requirements, Condition 1, Appendix 7	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	Yes	Addressed in Section 6.2.1.	-	-
Written Incident Notification Requirements, Condition 2, Appendix 7	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
Written notification of an incident must:	Yes	Addressed in Section 6.2.1.	-	-
(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;				

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(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.				
Written Incident Notification Requirements, Condition 3, Appendix 7	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
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.	No Yes	This condition has not been addressed in Section 6.2.1. Resolved, Section 6.2.1 updated.	Include the requirements of this condition in the notification procedure in Section 6.2.1. Resolved	Requirements included in Section 6.2.1
Written Incident Notification Requirements, Condition 4, Appendix 7	**Sufficient (Yes/No/Partial)**	**Document reference and comment**	**Action Required**	**Company Response**
The Incident Report must include:	No Yes	This condition has not been addressed in Section 6.2.1. Resolved, Section 6.2.1 updated.	Include the requirements of this condition in the notification procedure in Section 6.2.1. Resolved	Requirements included in Section 6.2.1.
(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	Partial Yes	While this condition has not been included as part of the incident notification and reporting procedure in Section 6.2.1, corrective actions are mentioned in Section 6.2.3. Resolved, Section 6.2.1 updated.	Resolved	Requirements included in Section 6.2.1.
(d) details of any communication with other stakeholders regarding the incident.				