



Glenellen Solar Farm

Environmental Management Strategy

Global Power Generation Australia Pty Ltd

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A TETRA TECH COMPANY

DOCUMENT TRACKING

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Project Manager	Courtney Blick
Prepared by	Rebecca Ben-Haim and Courtney Blick
Reviewed by	Daniel Magdi
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Template 2.8.1

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Abbreviations

Abbreviation	Description
AES	Accommodation and Employment Strategy
BC Act	<i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
BMP	Biodiversity Management Plan
CEMP	Construction Environment Management Plan
DPE	NSW Department of Planning and Environment
DPHI	NSW Department of Planning, Housing and Infrastructure (formerly DPE)
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
ELA	Eco Logical Australia Pty Ltd
EMS	Environmental Management Strategy
EPA	Environmental Protection Authority
EP&A Act	Environmental Planning & Assessment Act
EPBC Act	<i>Environment Protection and Biodiversity Conservation 1999</i>
EPC	Engineering, procurement, and construction
FRNSW	Fire and Rescue New South Wales
GPG	Global Power Generation
HMP	Heritage Management Plan
HSE	Health, Safety and Environment
LGA	Local Government Area
MDA	Marshall Day Acoustics
MLA	Moir Landscape Architecture
NCA	Non-Controlled Action
NGH	Nicholas Graham-Higgs
NSW	New South Wales
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water (formerly DPE)
NVMP	Noise and Vibration Management Plan
O&M	Operation and Maintenance
OEMP	Operational Environmental Management Plan

Abbreviation	Description
PV	Photovoltaic
RDMP	Rehabilitation and Decommissioning Management Plan
SEMP	Sediment and Erosion Management Plan
SSD	State Significant Development
TfNSW	Transport for New South Wales
TMP	Traffic Management Plan
TPZs	Tree Protection Zones
TGS	Traffic Guidance Scheme
WH&S	Work Health and Safety
WMP	Waste Management Plan

1. Introduction

1.1. Project Overview

The Proponent of Glenellen Solar Farm, Global Power Generation (GPG) Australia through its wholly owned subsidiary Glenellen Asset Pty Ltd, has obtained Development Consent for the construction, operation, maintenance, and decommissioning of the Glenellen Solar Farm (the Project). The Project comprises of photovoltaic (PV) arrays, power conversion units, collector systems, road upgrades, an Operation and Maintenance (O&M) building, fencing, security systems and meteorological stations.

The Project is located within the Greater Hume Shire Local Government Area (LGA), approximately 2 km north-east of Jindera and 20 km north of Albury, NSW (Figure 1-1). The approved Project layout is shown in Figure 1-2.

A full description of the Project is provided in the Environmental Impact Statement (EIS) which can be accessed on the NSW Government Major Projects Website or the Glenellen Solar Farm website at www.globalpower-generation.com.au.

1.2. Project Staging

The Project will be undertaken in stages for pre-construction (site preparation) works, construction, operation and rehabilitation or decommissioning. Staging details are outlined below:

- Stage 1a: Road upgrades or maintenance works to public road networks as outlined in Appendix 5 of Consent, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying
- Stage 1b: Solar farm construction commencement;
- Stage 1c: Solar farm construction continuation, including movement of heavy vehicles requiring escort during construction as described in Condition B1 of Schedule 2 of Consent.
- Stage 2: Solar Farm Operation; and
- Stage 3: Solar Farm Decommissioning at end of life.

1.3. Purpose and Objective of this EMS

This Environmental Management Strategy (EMS) has been prepared to meet the State and Commonwealth environmental approval requirements for environmental management.

This EMS is an overarching plan for the Project which sets out the environmental management strategies for all facets of the Project including design, construction, operation, and decommissioning. It describes the environmental management systems and measures intended to protect, minimise, and manage environmental impacts during design, construction, operation, and decommissioning.

In addition to the EMS, several other specific environmental subplans are required by SSD-9550. These are listed in Sections 2.2 and 2.4 of this EMS. The scope of these subplans is to provide detailed procedures for managing the relevant environmental issues in each subplan. The mitigation measures, monitoring methods and reporting procedures are detailed in these subplans and are periodically reviewed as the development progresses. These subplans are approved by the NSW Planning Secretary.

This EMS has been prepared to meet the requirements of condition C1 of SSD-9550. Table 1-1 provides a reference to the requirements of Condition C1 and a reference to the section of the EMS where it has been addressed. Implementation of this EMS and the relevant sub-plans will be guided by the Project Construction Environment Management Plan (CEMP), which the Proponent and the Engineering, Procurement and Construction (EPC) Contractor will be responsible for implementing.

Following approval from the NSW Planning Secretary, this EMS will be implemented in accordance with Condition C1 and will be made publicly available on the Project website (www.globalpower-generation.com.au) in accordance with Condition C20 of SSD-9550.

Table 1-1: Requirements of Condition C1 SSD-9550

Condition Requirement	Addressed in this EMS
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:	Whole Document
a. Provide the strategic framework for environmental management of the development;	Section 2
b. Identify the statutory approvals that apply to the development;	Section 3
c. Describe the role, responsibility, authority, and accountability of all key personnel involved in the environmental management of the development;	Section 4
d. Describe the procedures that would be implemented to:	
i. Keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Sections 5.1 and 5.2
ii. Receive, handle, respond to, and record complaints;	Section 5.3
iii. Resolve any disputes that may arise;	Section 5.4
iv. Respond to any non-compliance;	Section 6.4
v. Respond to emergencies; and	Section 8.2
e. Include:	
i. References to any strategies, plans and programs approved under the conditions of this consent; and	Section 2
ii. A clear plan depicting all the monitoring to be carried out in relation to the development.	Section 6
Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	

1.4. Application of this EMS

This EMS and the associated environmental subplans apply to, and must be followed by, all employees, contractors and visitors during the construction, operation and decommissioning of the Project. The EMS will form the basis of the CEMP to be prepared by the EPC Contractor. Further details on the CEMP are provided in Section 2.4 of this EMS.

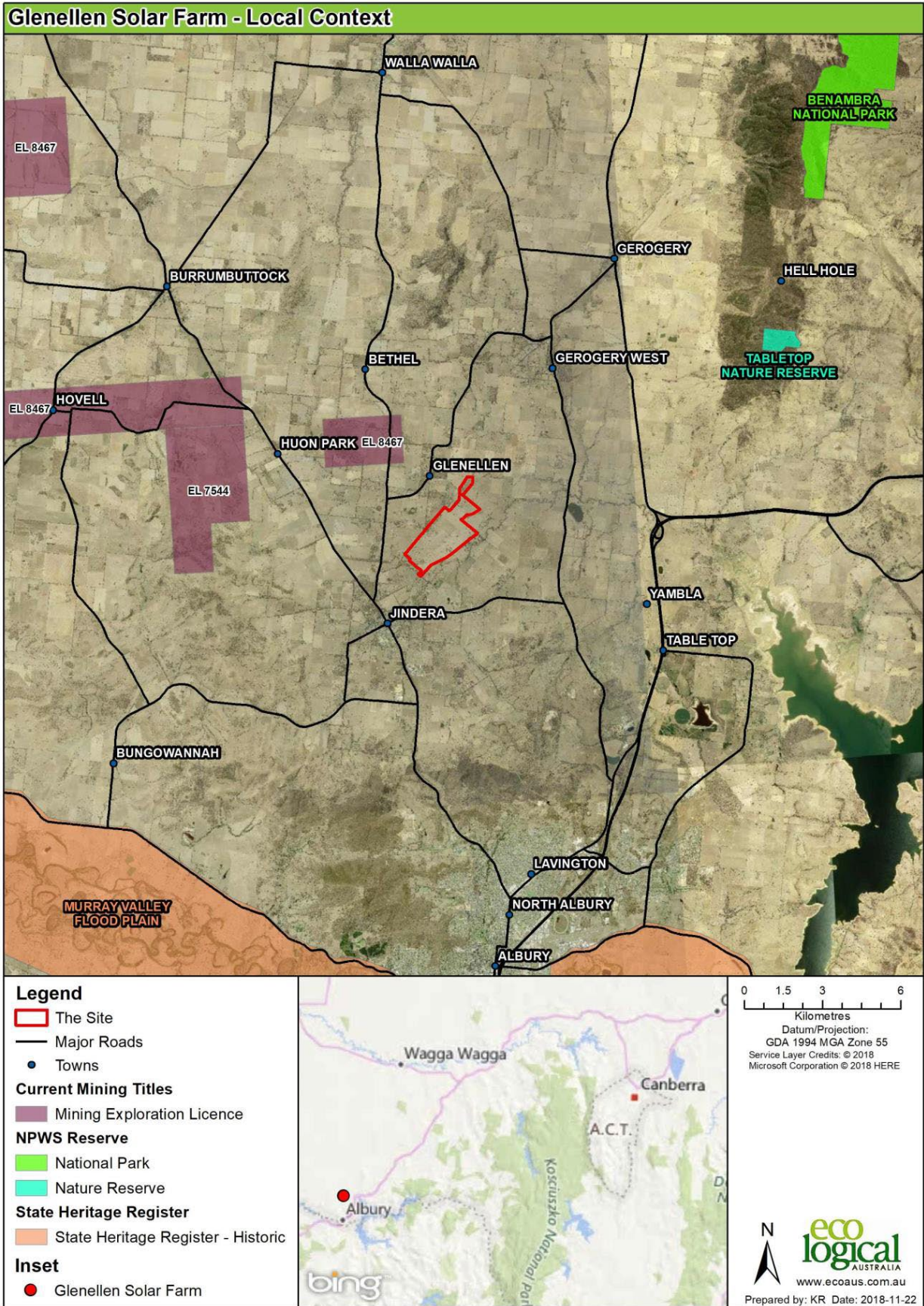


Figure 1-1: Location of the Project Site

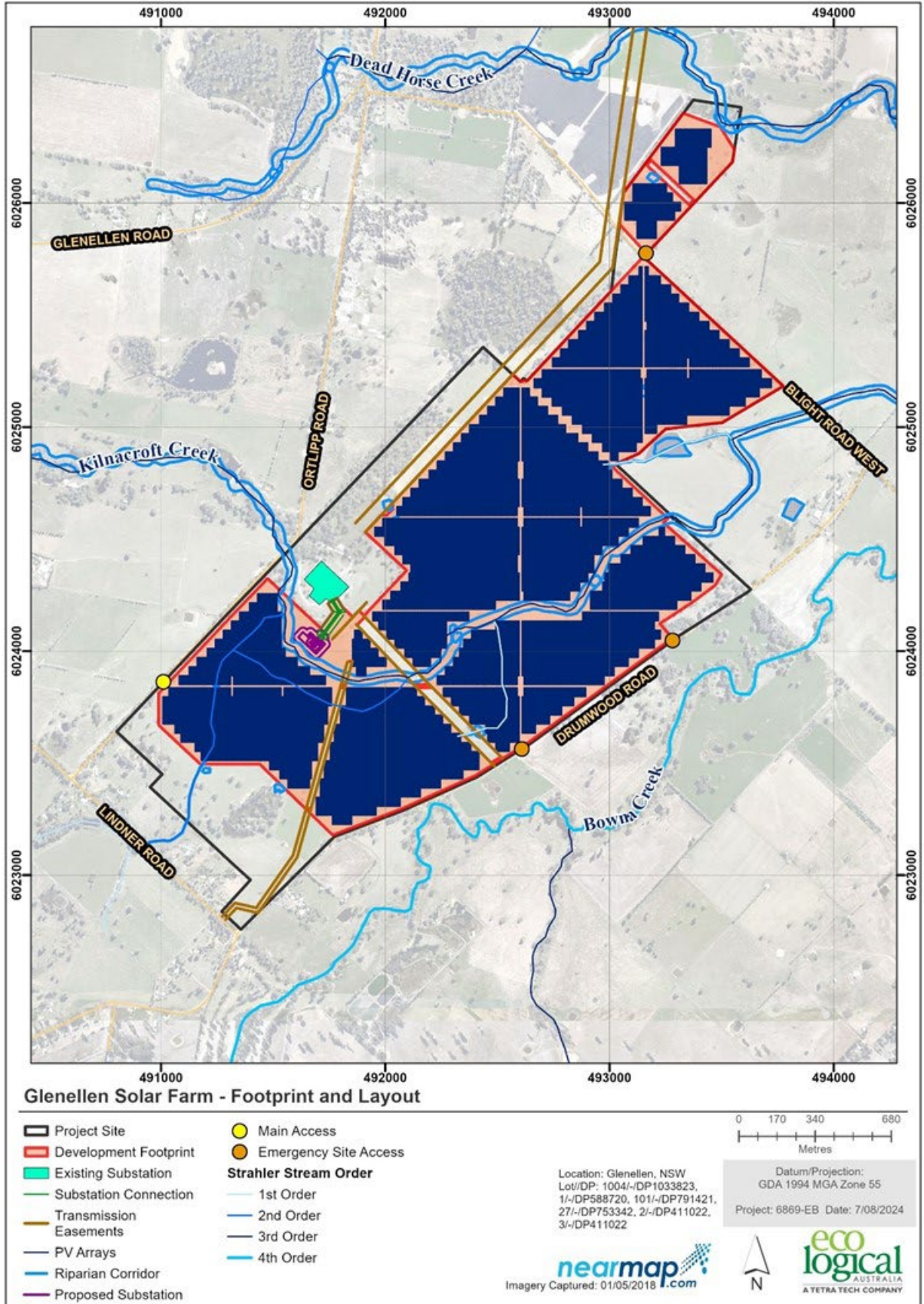


Figure 1-2: Approved Project layout under SSD-9550

2. Environmental Management Framework

2.1. Environmental Management System

GPG Australia is part of the Naturgy Energy Group. This strategy has been prepared in alignment with the Naturgy ISO 14001 certified Environmental Management System. This includes processes related to incident management, emergency response, risk assessment, training and reporting.

2.2. Environmental Policy

All Project activities will be completed in accordance with relevant objectives and guidelines under the Naturgy Corporate Responsibility Policy (summarised in Section 2.2) which is provided in Appendix A. This Policy specifically commits to:

- Contributing to sustainable development;
- Mitigation of and adaptation to climate change;
- Minimise the adverse effects on ecosystems and promote the conservation of biodiversity;
- Promote the efficient and responsible use of energy and natural resources; and
- Guarantee the prevention of pollution.

2.3. Environmental Strategies, Plans and Programs

In addition to this EMS, the Development Consent requires several other strategies, plans and programs (referred to as subplans) to be prepared for the Project, as outlined in Table 2-1 and Figure 2-1.

Table 2-1: Environmental subplans required by Development Consent

SSD-9550 Condition	Strategy, Plan or Program Reference	Description of Plan
B9	Traffic Management Plan (TMP)	Measures to be implemented to minimise traffic impacts during construction, upgrading or decommissioning works such as dilapidation surveys, traffic controls, scheduling, notification, and complaints management.
B10 B11 B12	Landscape Plan	Measures to establish and maintain vegetation buffers (landscape screening) and other plantings in order to screen receivers from views of the Project.
B13	Rehabilitation and Decommissioning Management Plan (RDMP)	To guide the management of groundcover for the life of the Project, for the purposes of grazing and continued agricultural practices including cropping. Includes weed management and establishing groundcover within 3 months from completion of construction.
B19	Biodiversity Management Plan (BMP)	Measures to ensure compliance with the approved Biodiversity Development Assessment Report (BDAR) (ELA 2023) and Arboricultural Assessment (ArborViews 2023)
B22	Noise and Vibration Management Plan*(NVMP)	Measures to minimise noise and vibration generated during construction, upgrade or decommissioning activities associated with the Project in accordance with the <i>NSW Noise Policy for Industry</i> (EPA 2017)

SSD-9550 Condition	Strategy, Plan or Program Reference	Description of Plan
B30	Sediment and Erosion Management Plan* (SEMP)	To minimise any soil erosion and control sediment generation, provide for appropriate drainage and sediment and erosion controls and their maintenance throughout construction.
B27	Heritage Management Plan (HMP)	Cultural heritage management to ensure Aboriginal objects and sites are protected, unexpected finds are managed and any impacts are in accordance with relevant permits and approvals.
B33 B34	Emergency Plan	To identify the fire risks and hazards including detailed measures for the development to prevent or mitigate fires igniting and specific measures in the case of flood to ensure site safety.
B35	Waste Management Plan (WMP)*	To guide the minimisation of waste generated by the Project, classification of all waste and removal of waste from the Project Site for reuse, recycling or appropriate disposal with Council consultation.
B36	Accommodation and Employment Strategy (AES)	To ensure sufficient workforce accommodation, provide options for local workforce recruitment and provide for monitoring and review during construction.
B37 B38	RDMP	For the appropriate progressive rehabilitation of the site, and to guide any decommissioning or rehabilitation at the end of Project operation in a way that minimises impacts and ensures public safety at all times.
C8	Final Layout Plan	Site plans for the final development layout, including details on the micro-siting of solar panels and ancillary infrastructure based on the detailed design process.

* INDICATES THAT PLAN IS NOT EXPLICITLY REQUIRED BY CONSENT CONDITION, BUT DESIGNED TO ENSURE CONSENT CONDITIONS ARE MET.

These subplans provide the detailed mitigation measures necessary to minimise environmental impact and achieve compliance. Once approved, copies of the above subplans will be made available on the Project website at <http://www.globalpower-generation.com.au/>.

2.4. Contractor Environmental Management Plans

As part of the Environmental Management Framework of the Project, the EPC Contractor will prepare and implement a CEMP and various safety management plans prior to commencing construction. The CEMP will detail stage-specific procedures and plans to address specific requirements of the Project approvals, the overarching EMS, and the subplans that are listed in Section 2.2. This is represented diagrammatically in Figure 2-1.

GLENELLEN SOLAR FARM - MANAGEMENT PLANS

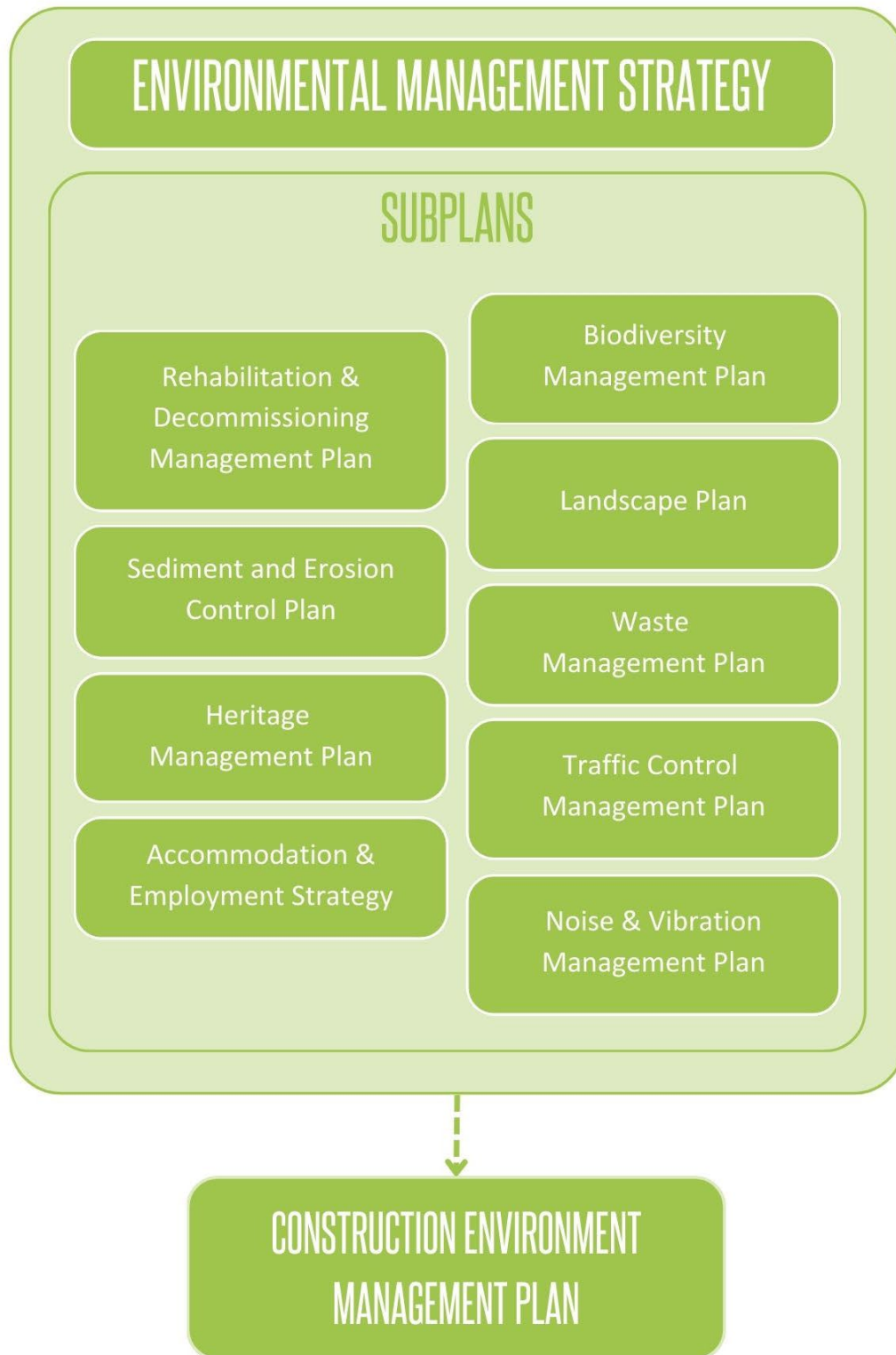


Figure 2-1: Relationship between Project approvals and environmental management documentation

3. Statutory Approvals

3.1. Overview of Statutory Approvals

The following statutory approvals have been obtained for the Project:

- Development Consent SSD-9550
- Commonwealth EPBC Referral 2023/09628

3.2. NSW Development Consent SSD-9550

The Project has obtained State Significant Development (SSD) Consent (SSD-9550) under the *Environmental Planning and Assessment Act 1979* (EP&A Act). An EIS was prepared as part of the Development Application process, to assess the impacts of the development. The EIS and associated documentation can be found on the NSW Major Projects website at [Glenellen Solar Farm | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](https://www.nsw.gov.au/planning-portal).

In accordance with Condition A1 of the Development Consent, all reasonable and feasible measures will be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation or decommissioning of the development.

The Development Consent includes the following conditions:

Condition A2 – The development may only be carried out:

- a. in compliance with the conditions of the consent;
- b. in accordance with all written directions of the Planning Secretary;
- c. generally, in accordance with the EIS; and
- d. generally, in accordance with the Development Layout in Appendix 1 of the consent.

Condition A3 – The Applicant must comply with any requirement/s of the Planning 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.

Condition A4 - The conditions of the consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity, or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity, or conflict.

Additional conditions for Environmental Management (Development Consent Part C) are provided in Appendix B together with a description of how the Project will comply with those conditions. All

conditions of the consent are incorporated into the Project’s internal Compliance Tracking Matrix, which will be maintained by the HSE Manager throughout the development.

3.3. EPBC Referral 2023/09628

The Project has been determined Not a Controlled Action (NCA) under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The EPBC Referral and related Decision Notices are available on the EPBC Public Portal at the following website:

<https://epbcpublicportal.awe.gov.au/all-referrals/project-referral-summary/?id=870dd98a-763d-ee11-bdf4-000d3a79456f>

3.4. Additional Approvals, Permits and Licences

Table 3-1 identifies additional approvals, permits, and licences that apply to the Project.

Table 3-1: Additional approvals, permits and licences required

Approval Type	Activity Relating to Approval	Timing	Approval Authority
Section 138 <i>Roads Act 1993</i>	Undertaking work in, on or over a public road.	Before construction works commence	Transport for NSW (TfNSW)
Part 5 Division 5.6 – Licenses over Crown Land <i>Crown Land Management Act 2016</i>	Crown Road licence for works over the Crown Roads within the Project Site	Before works on Crown Roads	NSW Department of Industry (DPI) Land & Water Crown Land Department
Section 17 <i>Renewable Energy Act 2000</i>	The Project requires accreditation as a Renewable Energy Generator to create Renewable Energy Certificates.	Before construction / operation commences	Commonwealth Government

4. Role and Responsibilities

4.1. Structure and Responsibility

The Proponent has ultimate responsibility for ensuring compliance of the Project with the State and Commonwealth environmental approval requirements for environmental management throughout the lifecycle of the Project. The Proponent will ensure that all its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of the consent relevant to activities they carry out in respect of the development.

The Proponent will engage an EPC contractor who will be responsible for design and construction of the Development. The Proponent will provide this EMS to the EPC, who will be responsible for preparing a CEMP to meet all statutory requirements as it relates to the scope of their works and environmental requirements.

The EPC's CEMP includes roles and responsibilities, reporting procedures, authorisations for managing environmental incidents, non-compliance, environmental management and mitigation, risk assessment and inspection and audit of the Project during the design and construction phase. These obligations are detailed in the contract between the two parties.

The EPC's CEMP will be prepared before the commencement of construction and will be reviewed by the Proponent. The EPC's CEMP will be periodically reviewed and where necessary revised by the EPC to reflect the stage of construction and environmental risks associated with that stage of construction. The Proponent will review the EPCs documentation to confirm consistency with the requirements of this EMS and subplans.

During operation, the Proponent will enter a separate contract for the operational management of the Project. The Proponent's EMS will be revised to reflect the operational status of the Project, and this EMS will be provided to the operational contractor who will be responsible for preparing an Operational Environmental Management Plan (OEMP) to meet all statutory requirements as it relates to the scope of their works and environmental requirements.

The Proponent will undertake audits and inspections of the contractors to assess compliance and environmental management. The scope and frequency of the environmental audits is described in Section 6. The contractors will be required to keep and supply records that support compliance and environmental obligations to the Proponent. Incidents and non-conformances must be reported to the Proponent in accordance with the timeframes and to meet the requirements specified in the Contract, and as described in Section 7.

Table 4-1 provides a general summary of the intended roles and likely responsibilities of the key personnel.

Table 4-1: Key roles and responsibilities

Role	Responsibility
Project Manager	<ul style="list-style-type: none"> Responsible for CEMP and sub-plan implementation Stop works order in the case of non-compliance or incident Completing ongoing monitoring and internal audits as required

Role	Responsibility
Site Manager	<ul style="list-style-type: none"> • Ensure implementation of the CEMP and sub-plans, and targets on site together with the EPC Site Manager • Supporting the HSE Manager in ongoing compliance monitoring • Identification of any non-compliance • Notifying the Project Manager of any non-compliance or incident • Ensuring daily and weekly environmental checklists are completed
Health, Safety and Environment (HSE) Manager	<ul style="list-style-type: none"> • Support the Project Manager to implement with CEMP and sub-plans • Notifying the Project Manager of any non-compliance or incident • Maintaining compliance with this EMS and its subplans (including record keeping for environmental induction) • Maintaining the compliance tracking matrix • Ensuring inductions and environmental training are adequate and compliant with Development Consent and this EMS • Ensuring all Independent Audits are carried out in accordance with the required timeframes • Completing ongoing monitoring and internal audits as required.
HSE Supervisor	<ul style="list-style-type: none"> • Support the Site Manager to implement the CEMP and sub-plans • Liaison with onsite contractors and relevant stakeholders involved in the CEMP, including local First Nations networks & suppliers
Independent Environmental Auditor	<ul style="list-style-type: none"> • Complete Independent Audit and produce reports in accordance with SSD-9550 Condition C14 – C19, <i>Independent Audit Post Approval Requirements</i> (DPIE 202), Section 6.2.1 of this EMS and Table 6-2 • Providing an audit report to the Proponent team within a timely manner so that it can be published, with any response from the Proponent, within 60 days of site inspection
Operations Project Manager	<ul style="list-style-type: none"> • Responsible for CEMP fulfillment during the operation phase • Monitor O&M Contractor on fulfillment of EMS, CEMP and sub-plan activities and targets • Liaison with Council • Reporting of CEMP and sub-plan outcomes to the Planning Secretary and other stakeholders
EPC Project Manager	<ul style="list-style-type: none"> • Ensure implementation and compliance with CEMP and sub-plan activities and targets on site • Liaison with Council and other stakeholders • Reporting of CEMP and sub-plan outcomes to Project Manager
EPC Site Manager	<ul style="list-style-type: none"> • Maintaining competency with the requirements of this EMS and all subplans • Notifying the HSE Manager and Site Manager of any non-compliance or incident • Inducting the Site Manager in accordance with the Development Consent Conditions, this EMS and its subplans • Ensuring all staff working on site have completed the required environmental training and inductions <ul style="list-style-type: none"> ○ <i>Note – GPG will review and approve for adequacy and ensure correct implementation by Contractor.</i> • Completing daily and weekly environmental checklists • Maintaining records of monitoring and inspections • Providing induction and monitoring records to the HSE Manager

Role	Responsibility
	<ul style="list-style-type: none"> Monitoring, tracking and reporting of CEMP and sub-plan outcomes to EPC Project Manager
EPC Health, Safety and Environment (HSE) Coordinator	<ul style="list-style-type: none"> Support the EOC Project and Site Managers to implement the CEMP and sub-plans Liaison with EPC sub-contractors and relevant stakeholders involved in the CEMP and sub-plans On-site primary first aid Emergency procedures Notification to Site Manager / HSE Manager of any incidents or non-compliance
O&M Project Manager	<ul style="list-style-type: none"> Support the Proponent for fulfilment of the CEMP during the operation phase Liaison with O&M sub-contractors and relevant stakeholders Reporting of CEMP and sub-plan outcomes to Operations Project Manager
All Employees and Contracted Staff	<ul style="list-style-type: none"> Complete a site induction prior to commencing works on site Attend all environmental training as required Comply with environmental controls provided within this EMS and all associated plans, programs and strategies (including Contractor subplans) Carry out all works in accordance with the agreed procedures and work methods Implement the actions identified in the management plans and programs to comply with the Development Consent conditions Follow instructions of the HSE Manager and Project Manager Notify the Site Manager of any breaches of this EMS, its subplans or environmental incidents that occur during works

Specific management plans such as but not limited to the TMP and BMP will have input from technical specialist for management and monitoring.

5. Communication Procedures

5.1. Community Consultation

Significant community consultation has occurred throughout the approvals process for the Project and will continue into the pre-construction, construction and operation phases. The purpose of ongoing community consultation or communications is to ensure all interested parties (community and stakeholders) are easily able to access information relating to the Project and establish a process for complaints and dispute resolution.

Further consultation with community through the sharing of information, notification of project updates and open complaint and communication channels will be undertaken for the life of the Project, as described below.

5.2. Information Sharing

The Proponent will share and provide information to the relevant Agencies in accordance with State Development Consent SSD-9550, as described in Section 3.2, and all notification procedures described in the relevant management subplans listed in Section 2.3. General information sharing methods are described below.

5.2.1. Website

The Project has a dedicated website at <http://www.globalpower-generation.com.au/> which will be regularly updated and maintained for the life of the Project, providing key updates and information to the community and stakeholders including:

- Information about the Development, including the EIS, conditions of consent and final layout
- Key contact details (phone, email and postal address)
- Current Project status with an estimated timeline
- Statutory approval documentation
- All plans, strategies or programs required as part of consent
- Monitoring results prepared in accordance with the various environmental subplans
- Complaints register (updated monthly)
- Results of any independent environmental audit and GPG response
- Any other matter as required by the Planning Secretary.

5.2.2. Other methods

A combination of information sharing methods will be used to reach the local community and stakeholders effectively, and to ensure accessibility, as follows:

- **Regular newsletter** to inform registered parties of significant Project updates via email (registration to be made available on Project website) or to be collected from council if access to internet is poor
- **Weekly Construction updates** will be published on the project website
- **Complaints register** documenting complaints made by phone, email or website submission
- **Reporting** incidents and non-conformance to the relevant government agency

- **Annual environmental performance reports** to be prepared and provided to relevant government agency and will be published on the project website
- **Dedicated telephone line** for enquiries
- **Dedicated email address** for enquiries
- **Newspaper advertisement** when appropriate
- **Phone, postal letterbox drops and/or face to face information sessions** for notification, as deemed appropriate, of milestones or events during the Project including:
 - Commencement of pre-construction works
 - Commencement of each construction phase
 - Completion of construction or commencement of Project operation
 - Commencement of rehabilitation works
 - Commencement of decommissioning
 - Any changes to Project timing or other factors that may affect local community

5.3. Complaints

5.3.1. Receiving complaints

Complaints and enquiries about the Project can be made by the following methods:

- Email: info@globalpower-generation.com.au
- Phone: 1800 457 181
- Postal address: Global Power Generation Australia Pty Ltd – Suite A Level 3, 73 Northbourne Avenue, Canberra ACT 2601
- Website: www.globalpower-generation.com.au
- Face to face.

For the duration of construction and operation, the email, phone, and postal contact methods will be maintained and published on the Project website.

5.3.2. Complaint handling and response

Complaints received via any of the methods listed above will be provided to the Proponent's Project Manager within 24hrs of receiving the complaint. Additional key personnel will be notified for action, including the Site Manager and nominated Stakeholder Engagement Officer as required.

Complaints and enquiries will be responded to within 48 hours of receipt. Initial contact with the complainant will either outline actions taken to resolve the complaint or a holding statement while the complaint is being investigated.

Specific procedures for handling traffic-related complaints are described in the TMP.

All complaints will be recorded in the Complaint Register which will be maintained by the Stakeholder Engagement Officer. The register will keep a record of:

- Date and time of the complaint
- Type of communication (i.e. telephone, mail, meeting, email etc.)
- Name, address, contact telephone number of complainant/enquirer (where available)

- Nature of the complaint and enquiry
- Actions taken in response including any associated timeframes for implementing the action
- If no action was taken, the reason why no action was taken
- When and how the complainant/enquirer was notified of the outcome or provided an answer.

The Complaints Register will be placed on the website (noting personal information relating to the complaint or the person making the complaint will be removed) and updated monthly. A formal complaint form template is provided in Appendix D and sample complaints register in Appendix E.

5.4. Dispute Resolution

It is the aim of the Proponent and all staff to maintain a good relationship with all internal and external stakeholders so that no disputes eventuate. All efforts will be made to resolve a dispute internally with the affected party.

When a complaint cannot be resolved and a dispute has arisen:

- An investigation will be initiated by the Project Manager, with input from Stakeholder Engagement Officer, Legal Counsel, relevant technical/subject matter expert and relevant parties as required, to clarify the dispute and actions taken to date.
- An investigation will be undertaken to assess the nature of the dispute and possible resolution with the aim of reaching mutual agreement between parties.
- If necessary, an appropriately qualified and experienced independent person or third party, (e.g. a technical or subject matter expert) may be asked to provide advice on the investigation and/or facilitate mediation to reach a resolution. There may be some circumstances where it is appropriate to involve the Australian Energy Infrastructure Commissioner to assist with the dispute resolution process if the complaint or dispute has previously been referred to Commissioner.
- If agreement cannot be achieved after 12 months of registering the original complaint, either party may refer the dispute to the Planning Secretary for resolution in accordance with the Development Consent.

6. Environmental Monitoring and Compliance Management

Environmental monitoring will be conducted to measure performance of the EMS, including the effectiveness of environmental control measures, and compliance with the Project statutory approvals, licences, plans, strategies, and programs.

Environmental compliance and monitoring during the Project will be managed in several ways, including:

- Inductions (see Section 6.1);
- Environmental inspections and audits (see Section 6.2);
- Specific monitoring and measurement of a particular environmental aspect as required under the development consent (summarised in Section 6.3)

The Project's CEMP will guide on-ground implementation to ensure compliance with this EMS and conditions of consent. The Site Manager is responsible for implementation of the CEMP and relevant sub-plans.

6.1. Environmental Inductions

All staff must be inducted prior to working on the Project. The EPC will be responsible for preparing the site induction contents, however an indicative induction program has been outlined in Table 6-1 below. The HSE Manager is responsible for ensuring the contents of the environmental inductions is appropriate and responds to requirements under both the Development Consent and this EMS.

The EPC Site Manager is responsible for administering the induction process, including record keeping and providing records of induction to the HSE Manager.

Table 6-1: Example induction contents

Environmental Aspect	Example Induction Contents
Protecting the Environment	
Cleanliness & Tidiness	<ul style="list-style-type: none"> • Keeping work zones as tidy as possible • Minimising scattering of materials and waste • Limiting stockpiles to suitably located areas • Covering of stockpiles • Accident prevention through cleanliness • Use of fencing and signs to delineate work zones
Movement and traffic	<ul style="list-style-type: none"> • Speed limits on tracks and surrounding access roads • Cleaning of vehicles/machinery wheels • Repairing of damage to roads or other surfaces • Use of fencing and signs to delineate machinery and personnel movements
Materials and Waste Storage / Management	<ul style="list-style-type: none"> • Implementation of a solid waste handling and management policy • Identifying specific areas for hazardous waste storage (considering environmental constraints i.e. away from streams, wetlands, vegetation or tree drip lines, pervious areas, ventilation). Provide instruction for access restrictions (i.e. authorised personnel only) • Location of appropriate waste receptacles which are to be appropriately labelled • Restrictions (no mixing waste types, no burning of waste on site, no dumping)

Environmental Aspect	Example Induction Contents
	<ul style="list-style-type: none"> Fuel and oil tank emptying or refilling operations
Soils and Water	<ul style="list-style-type: none"> Requirements under the Sediment and Erosion Control Plan including: <ul style="list-style-type: none"> Soil stripping procedures Stockpile management Installation of bunding and filters Water monitoring locations, frequency and duration Inspections, monitoring and reporting requirements Awareness of Stop Work triggers if an activity has caused, or is likely to have, a detrimental effect on soil and/or water quality
Unexpected finds	<ul style="list-style-type: none"> Notification if anything of geological, archaeological or historical interest is discovered during works
Protecting Biodiversity	
Environmentally sensitive areas	<ul style="list-style-type: none"> Demonstrate specific signage and fencing that delineates the development footprint Signage and fencing that delineates no-go areas and additional requirements (e.g. Arborist supervision of Tree Protection Zones (TPZs) to ensure tree retention) Pre-clearance and clearing procedures in accordance with the BMP
Fauna presence	<ul style="list-style-type: none"> Any fauna requiring management or relocation – reference procedures in accordance with the BMP Comply with fauna management procedures in accordance with the BMP

6.2. Environmental Inspections

A range of environmental inspections will be conducted by the Site Manager and EPC Project Manager to evaluate the effectiveness of environmental controls and general compliance with the implementation of the EMS (and associated strategies, plans and programs) for all Development activities.

The EPC Contractor must undertake environmental inspections of all work areas as follows:

- Regular inspections (at least weekly)
- Inspections following adverse weather conditions including:
 - Heavy rainfall
 - High wind periods
- Inspections prior to and/or following the delivery of significant equipment or materials

The outcomes of the environmental inspections will be reported within an environmental inspection checklist. The checklist will be developed as part of the EPC Contractors CEMP. The checklist will incorporate a range of environmental inspection criteria to document compliance with, and effectiveness of, the various mitigation measures and controls specified within this EMS and within the other management plans, strategies or programs required under the development consent.

A report must be provided to the Proponent at least fortnightly documenting environmental compliance.

The HSE Manager will undertake environmental inspections (monthly, or more frequently as required) to monitor compliance with the Project Approvals and adherence to the Strategies, Plans and Programs.

The frequency of audit requirements (independent and internal) is described below.

6.2.1. Independent Environmental Audit

In accordance with Condition C14 to C19 of SSD-9550, Independent Audits of the development will be conducted and carried out at the frequency described and in accordance with the *Independent Audit Post Approval Requirements* (DPIE 2020), unless otherwise agreed or directed by the Planning Secretary. Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

During the construction phase, an Independent Environmental Audit will be carried out within 3 months of commencing construction and at the ongoing frequency described in Table 6-2.

Independent Audits will be carried out within 3 months of commencement of operations.

Table 6-2: Independent Audit frequency

Project Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 3 months from commencement of construction	At intervals no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary
Operation	Within 3 months from commencement of operations	At intervals no greater than 3 years or as otherwise agreed by the Secretary
Closure or Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary

In accordance with Condition C17, the Proponent will submit electronic copies of the Independent Audit Reports, and the Proponent's response to the audits, to the Planning Secretary no later than 60 days after undertaking the Independent Audit site inspection. This may be done via the [NSW Government Major Projects website](#) and is the responsibility of the Proponent.

Independent Audit reports will be made publicly available on the Project website within 60 days of submission to the Planning Secretary, in accordance with Condition C18 of SSD-9550.

6.2.2. Internal Project Audit

The Proponent will carry out internal audits to verify compliance with the conditions of SSD-9550, this EMS and all associated strategies, plans and programs. The completion of internal audits will be in accordance with a schedule developed and carried out by the Project Manager and HSE Manager.

Internal audits are to be carried out on a quarterly basis during the construction phase. The audit schedule will identify the scope of the audit, timing of the audit, and the person(s) who will conduct the audit.

Any identified non-compliances with the development consent will be managed in accordance with Section 6.4 below.

6.3. Environmental Monitoring Summary

A summary of the monitoring plan for the development has been prepared in Table 6-3. This summary sets out all monitoring to be carried out in relation to the Project, including the method, timing, responsibility, and monitoring outputs (i.e., records/reporting type) including for relevant subplans.

All monitoring must be undertaken in accordance with Division 9.4 of the EP&A Act.

Note: Table 6-3 does not provide comprehensive details of all monitoring required for the Project. In some cases, the full monitoring requirements are detailed within the appropriate subplan that has been prepared in accordance with the requirements of SSD-9550. In these instances, a reference to the subplan is provided where the full monitoring details can be found. Additionally, not all subplans were made available at the time of preparation of this EMS and Table 6-3 should be updated accordingly when subplans are completed and approved.

Table 6-3: Summary of the monitoring obligations under SSD-9550

Type of monitoring	SSD-9550 Consent Condition reference	Subplan reference	Monitoring requirement	Timing and frequency	Responsibility	Reporting output and submission requirements
Biodiversity monitoring	Condition B19	BMP	<p>Regular inspections and monitoring to be completed during all pre-construction, construction and operational activities. Monitoring includes:</p> <ul style="list-style-type: none"> • Pre-clearing procedures • Adherence with vegetation clearing limits • Supplementary watering of roadside trees • Hollow-bearing tree management • Active fauna management • Fauna rescues • Unexpected threatened species • Monitor open excavations for trapped fauna • Monitor vehicle locations and road usage is within Development Footprint • Laydown and temporary disturbance areas • No-go zones • Weed infestations • Vertebrate pests • Incident and non-conformance 	In accordance with Table 7-2 of BMP	EPC Project Manager, generally in consultation with Project Ecologist and/or Arborist and the Proponent	<p>Most ongoing inspection records will be collated weekly. Some specific records must also be provided on a monthly basis to the Project Arborist.</p> <p>Ongoing management measures generally require monthly reporting.</p>
Accommodation & employment monitoring	Condition B36	Accommodation and Employment Strategy (AES) (NGH 2024)	<p>Consultation and feedback gathered through enquiries and complaints register, or meetings as required.</p> <p>Monitoring requirements include:</p> <ul style="list-style-type: none"> • Accommodation bookings • Securing rental properties • Human resources and hiring processes • Transport for employees <p>Detail provided in AES (NGH 2024).</p>	<p>Throughout construction:</p> <ul style="list-style-type: none"> • Internal monthly review of contracts housing needs and availability. • Monthly review of worker accommodation requirements and shift timing. 	Project Manager Stakeholder Engagement Officer	Reporting on metrics gathered through engagement.

Type of monitoring	SSD-9550 Consent Condition reference	Subplan reference	Monitoring requirement	Timing and frequency	Responsibility	Reporting output and submission requirements
				Detail provided in AES (NGH 2024).		
Groundcover monitoring	Condition B13	RDMP	<p>The plan includes measures for minimising ground disturbance to groundcover during construction, ongoing weed control, rehabilitation of any temporary construction areas and the re-contouring areas, and grazing management.</p> <p>Monitoring under the RDMP includes:</p> <ul style="list-style-type: none"> • Pre-clearing inspections – checking existing extent of groundcover • Monitoring of laydown and temporary disturbance areas • Monitoring of permanent monitoring plots as described in Section 5.2.3 of the RDMP • Monitoring of high disturbance or high-risk areas – groundcover, exclusion zones, fences • Areas of priority weeds will be mapped and inspected on a regular basis to ensure they are not outcompeting groundcover species 	<p>Groundcover establishment – Report within 3 months of construction</p> <p>Daily / weekly monitoring of temporary laydown and disturbance</p> <p>Daily / weekly monitoring of disturbance and high-risk areas</p> <p>Annual winter monitoring of permanent monitoring plots (or more frequently in adverse conditions)</p> <p>Monthly weed management monitoring</p>	<p>HSE Manager</p> <p>EPC Site Manager</p> <p>(refer to RDMP)</p>	<p>Groundcover establishment and permanent monitoring reporting reports required per frequency of monitoring</p> <p>Monthly weed infestation / management reporting</p> <p>Other reporting required in the event of non-conformance</p>

Type of monitoring	SSD-9550 Consent Condition reference	Subplan reference	Monitoring requirement	Timing and frequency	Responsibility	Reporting output and submission requirements
Heritage compliance & unexpected heritage finds	Condition B26 & B27	HMP (Past Traces 2024)	<p>The HMP provides for:</p> <ul style="list-style-type: none"> • Site inductions and heritage training • Salvage of impacted sites • Relocation of salvaged cultural material • Unexpected finds protocol for any heritage material • Review of the plan for effectiveness • Procedures for breach or non-compliance <p>A program to monitor and report on the effectiveness of the Heritage Management Plan (HMP) is provided in Section 4.6 of the HMP.</p>	Detail provided in HMP	<p>EPC Site Manager</p> <p>Project Manager & HSE Manager</p> <p>Heritage Consultant</p>	<p>Project Manager & HSE Manager</p> <p>Heritage Consultant</p>
Soil and erosion monitoring	Condition B30	Sediment & Erosion Control Plan (ELA 2024)	<ul style="list-style-type: none"> • Regular inspections to ensure erosion controls, stockpiles, soils and stormwater controls are in place and working 	Daily visual monitoring during construction phase. Monthly monitoring during operation phase.	EPC Site Manager	EPC Site Manager

Type of monitoring	SSD-9550 Consent Condition reference	Subplan reference	Monitoring requirement	Timing and frequency	Responsibility	Reporting output and submission requirements
Dust Management	Condition B23	Sediment & Erosion Control Plan (ELA 2024) TMP (PDC 2024)	Specific controls will be implemented within the CEMP, Sediment & Erosion Control Plan, and TMP to control the dust generated from site activities. The measures include: <ul style="list-style-type: none"> Dust suppression by wetting exposed surfaces and soil cover Minimising stripping back areas of vegetation Dampening the ground with light water spray Covering stockpiles Limiting vehicle speeds Further detail is within the CEMP.	Daily visual monitoring during construction phase. Ensure communities are kept updated regularly in relation to construction works which may generate dust.	EPC Site Manager	EPC Site Manager
Water quality	Condition B30	Sediment & Erosion Control Plan (ELA 2024)	<ul style="list-style-type: none"> Routine turbidity testing in gazetted waterways immediately upstream and downstream of construction footprint. 	Monthly during construction and after any suspected failure of sediment erosion control protocol during high rainfall event.	EPC Site Manager; HSE Manager	EPC Site Manager; HSE Manager
Noise and vibration monitoring	Condition B22	NVMP (MDA 2024)	Mitigation and management measures will follow best practice methods outlined within the Construction Noise Guidelines (EPA 2020)	Refer to Noise and Vibration Plan for timing and frequency for the different Project phases.	EPC Site Manager; HSE Manager	EPC Site Manager; HSE Manager
Development-related traffic monitoring	Condition B9	TMP (PDC 2024)	Mitigation and management measures are outlined in Section 5 of the TMP (PDC 2024) and includes: <ul style="list-style-type: none"> Traffic Guidance Scheme (TGS) to ensure compliance with Condition B9. Dust and dirt monitoring and suppression as required. Dilapidation surveys. Induction and compliance with relevant Code of Conduct per TMP 	Throughout pre-construction and construction activities	Regular inspection and review by the EPC Site Manager.	EPC Project Manager and traffic specialist

Type of monitoring	SSD-9550 Consent Condition reference	Subplan reference	Monitoring requirement	Timing and frequency	Responsibility	Reporting output and submission requirements
			<ul style="list-style-type: none"> Approval compliance monitoring Complaints register Community engagement at pre-construction and construction stages Ongoing review and adaptation of TMP as required to reflect changes 			
Waste management	Condition 35	WMP	<ul style="list-style-type: none"> Use of personal protective equipment (PPE) by all workers conducting waste management activities Appropriate training and implementation in the classification, storage, handling, documentation and disposal of waste Maintenance of vehicles and machinery to prevent spills or leaks, and develop spill response procedures Uphold a culture of responsible waste management on site Purchasing protocol intended to minimise volumes to materials purchased (i.e. minimise waste generation at the source) Purchase of panels that meet the relevant standards and include minimum 25-year warranty Adequate temporary materials and equipment storage areas during construction, with clear labelling for waste streams Safe storage and transport of waste to avoid spills and windblown debris Dispose or recycle waste as soon as practicable No receiving of external waste or disposal of waste on site 	Pre-construction and construction	EPC Manager Site	<p>Quarterly reporting for:</p> <ul style="list-style-type: none"> Waste produced during construction, operation, and decommissioning All waste going to approved recycling facilities Adequate training in waste management for relevant staff <p>The Contractor and Project Manager are responsible for reporting in accordance with the WMP (Coffey 2024).</p>

Type of monitoring	SSD-9550 Consent Condition reference	Subplan reference	Monitoring requirement	Timing and frequency	Responsibility	Reporting output and submission requirements
			<ul style="list-style-type: none"> Identify opportunities to follow the waste hierarchy to ensure that waste is minimised, recovered, and disposed of properly Recover resources and provide recycling facilities onsite Onsite and offsite transportation procedures and security measures Site restoration measures to return to previous land use. <p>The Site Manager is responsible for ensuring Condition B35 is met and the WMP implemented.</p>			
Independent Environmental Audits	Condition C14	EMS Table 6-3, Table 6-2 and Section 6.1	Independent Environmental Audit in accordance with Section 6.1 of this EMS and the <i>Independent Audit Post Approval Requirements</i> (DPIE 2020).	Within 3 months from start of construction, then minimum every 26 weeks thereafter (refer Table 6-2).	Independent Environmental Auditor	Submit to Planning Secretary within 60 days of Independent Audit site inspection. Make publicly available within 60 days of submission to Planning Secretary (refer Section 6.2.1)
Internal Project Environment Audits	Condition C2	EMS Section 6.1	Verify compliance with the conditions of SSD-9550, this EMS and all associated strategies, plans and programs	Quarterly	Project Manager and HSE Manager	HSE Manager to collate report following audit. Any non-compliance or incidents identified during internal audit to follow relevant processes / notification and reporting requirements.

6.4. Response to Non-Compliance

6.4.1. Defining non-compliance

In accordance with the conditions of consent, a non-compliance is defined as:

An occurrence, set of circumstances or development that is a breach of this consent but is not an incident.

An incident is defined as “a set of circumstances that causes or threatens to cause material harm to the environment”. Incident and emergency response has been addressed separately in Section 8.1.

6.4.2. Compliance Conditions

The conditions of consent provide criteria for non-compliance, summarised in Table 6-4 below.

Table 6-4: Non-compliance notification

Condition	Description
C11	The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance
C12	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.
C13	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

6.4.3. Identification of non-compliance

Non-compliance may be identified through internal or external audit, inspection, monitoring, incident investigation, community complaints or review. Regardless of the trigger, if non-compliance has been identified the following steps must be taken:

- Notify the Project Manager and Environment, Safety and Quality (HSE) Manager and stop relevant works if advised.
- The Project Manager and HSE Manager will ensure the non-compliance is investigated by the responsible party in order to determine the source, reason and implications of the non-compliance
- Advice will be sought from a relevant body if the implications of the non-compliance are unknown or are severe/require additional approvals
- Corrective and/or preventative actions will be developed and implemented by the responsible party, in consultation with GPG, such as:
 - Amending this EMS or relevant strategy, plan, program or procedure
 - Additional control measures
 - Staff training
 - Disciplinary actions
- The responsible party will prepare and submit a report to GPG which documents the investigation and corrective/preventative action process and outcomes. Reports must be

submitted in a timely manner to GPG, with regard to the severity of the non-compliance, but no later than 1 week following the non-compliance in order to notify the Department (see below).

6.4.4. Notifying the Department of non-compliance

In accordance with Condition C11 of SSD-9550, the Department must be notified via the Major Projects website portal within 7 days once the Applicant becomes aware of any non-compliance. The written notification must include the following details:

- Identify the Project and application number (Glenellen Solar Farm SSD-9550)
- Relevant condition which non-compliance was in breach of
- Describe the nature of non-compliance
- Reasons for non-compliance (if known)
- Corrective and/or preventive actions put in place, or that will be put in place, to address the incident

6.5. Compliance Tracking Matrix

A Compliance Tracking Matrix is an internal document that will be developed as a tool for monitoring compliance with SSD-9550 conditions of consent. The HSE Manager is responsible for maintaining the Compliance Tracking Matrix throughout the development.

The Compliance Tracking Matrix will be subject to routine review and update by the HSE Manager, to reflect the compliance of the Project. The Matrix will also be updated as required, in response to the outcomes of environmental monitoring or any non-compliance identification.

7. Environmental Reporting and Notification

7.1. Summary of Reporting and Notification Obligations

A summary of the reporting and notification obligations under the Development Consent for SSD-9550 and is provided in Table 7-1.

Note, that on receipt of additional approvals or licences (such as the Roads Act Section 138 permit), Table 6 will be updated to incorporate the relevant reporting and notification obligations.

Table 7-1: Reporting and notification obligations under SSD-9550

SSD-9550 Consent Condition	Report / Notification Description	Timing	Report to or notify
B9	Notification to the local community about development-related traffic impacts.	In accordance with the TMP	Community, TfNSW and Council
B27	Notification of the Project to the relevant local emergency management committee.	Prior to operations, once construction is complete	Fire and Rescue NSW
C7	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.	Prior to commencing relevant stage	The Department via Major Projects website
C8	Final Development layout per detailed design.	Prior to construction	The Department via Major Projects website
C9	Work as Executed Plans detailing completion of works.	Prior to operations	The Department via Major Projects website
C10	Incident notification must be provided in writing immediately after the Proponent becomes aware of an incident, including location and nature of the incident. Reports are to be submitted in accordance with Appendix 8 of the Consent Conditions.	Immediately after Proponent is aware of incident.	The Department via Major Projects website
C11	Notification and reporting of non-compliances – as described in Section 6.4 of this EMS.	Within 7 days from occurrence of non-compliance	The Department via Major Projects website
C17	The Proponent must: <ul style="list-style-type: none"> review and respond to each Independent Audit Report prepared under condition C14 of Schedule 2 of the Consent Conditions, or condition C16 of Schedule 2 where notice is given by the Planning Secretary; submit the response to the Planning Secretary; and 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. 	Within 60 days of Audit site inspection	Planning Secretary
C20	The Proponent must notify the public by making information publicly available on its website as relevant to the stage of development, and kept up to date:	As relevant to Project stage	Glenellen Solar Farm website

SSD-9550 Consent Condition	Report / Notification Description	Timing	Report to or notify
	<ul style="list-style-type: none"> • Final approved EIS • Final layout plans • Current statutory approvals • Approved strategies, plans and programs required by Consent SSD-9550 • The proposed staging plans • How complaints can be made • Complaints register • Compliance reports • Any independent environmental audit and Proponent’s response to recommendations • Any other matter required by the Planning secretary 		

8. Incident and Emergency Response

8.1. Response to an Incident under the NSW Development Consent

In accordance with the Development Consent SSD-9550, an ‘incident’ is defined as:

A set of circumstances that causes or threatens to cause material harm to the environment.

Material harm is 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 make good harm to the environment)*

All on-site key personnel must report a potential incident to the EPC Site Manager and Project Manager and/or HSE Manager. The Project Manager in consultation with the HSE Manager (and the HSE Lead as required) will determine if the incident has caused or threatens to cause material harm.

8.1.1. Immediate Notification Process

If the Proponent becomes aware of an incident relating to the Development Consent, the HSE Manager (or other key personnel nominated by the Project Manager) will notify the Department of the Incident in writing via the Major Projects portal immediately in accordance with Condition C10. The immediate notification will clearly identify the development (SSD-9550; Glenellen Solar Farm) and the location and nature of the Incident.

8.1.2. Formal Incident Notification Process

The HSE Manager (or other key personnel nominated by the Proponent’s Project Manager) will subsequently provide a written notification to the Planning Secretary within 7 calendar days after the Proponent became aware of an incident. This written notification will be provided via the Major Projects portal and will:

- Identify the development and application number (Glenellen Solar Farm; SSD-9550);
- 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; and
- Identify a project contact for further communication regarding the incident

8.1.3. Incident Report Process

Within 30 calendar days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the HSE Manager (or other key personnel nominated by the Project Manager) 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:

- 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; and
- Details of any communication with other stakeholders regarding the incident.

For environmental incidents that don't cause or threaten to cause material harm to the environment, the Project HSE Manager and Proponent Project Manager will determine what external agencies need to be notified, if at all.

For non-compliance, the process under Section 6.4 is to be followed.

8.2. Response to Emergencies

Responses to actual or potential emergencies will vary depending on the nature, scale, and severity of the emergency. Types of emergencies could include fire, explosion, chemical spill, medical emergency, natural disaster, bomb threat or violence.

Emergency response will be undertaken in accordance with specific emergency response plans to be developed for the project in accordance with the relevant Work, Health, and Safety Regulations. The emergency response process will generally be initiated in the following way in the event of an emergency:

- Raise the alarm;
- Implement the EPC Contractor Emergency Plan;
- For fire and bushfire emergencies, implement the Emergency Plan (Fire and Bushfire) prepared under Condition B28; and
- For pollution incident emergencies, implement the Contractor's relevant Pollution Incident Response Management Plan.

External agencies and support will be requested in accordance with the decision hierarchy outlined in the EPC Contractor's Emergency Response Plan, which will be prepared prior to commencement of construction. The Project Manager and/or HSE Manager will be notified of the emergency as soon as possible. This may be via the Site Manager who must immediately inform the Project Manager.

9. EMS Review

In accordance with Condition C2 of the Development Consent, the EMS (and any other relevant strategies, plans and programs) will be reviewed and, if necessary, revised within three months of:

- Submission of an incident report under Condition C10 of Schedule 2;
- Submission of an audit report under Condition C14 of Schedule 2; or
- Any modification to the conditions of the Development Consent.

If the EMS is updated, it will be submitted to the Planning Secretary for approval in accordance with Condition C3 of the Development Consent. In accordance with Condition C5 of the Development Consent, if the updated strategy is approved by the Planning Secretary, the updated EMS will be implemented and will supersede the previous version of the EMS.

10. References

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APPENDIX A

Corporate Responsibility Policy

Corporate Responsibility Policy



Corporate Responsibility Policy

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Corporate Responsibility Policy

1. Introduction

Naturgy understands Corporate Responsibility (CR) as the set of actions developed to establish trustworthy, stable, solid and mutually beneficial relationships with its stakeholders and with the regions in which it carries out its activities. This group includes shareholders, investors and financiers, customers, employees, regulators, suppliers and external collaborators and other market agents and social groups.

Naturgy's CR Policy establishes the common framework of action that directs the socially responsible behaviour of the company. Therefore, the main purpose of this Policy is to establish the way we go about our business and honour our commitments to stakeholders, in line with the corporate strategy, and to determining responsibilities and specific monitoring tools to ensure compliance.

2. Scope of application

The CR Policy is applicable to all companies that make up Naturgy Energy Group, SA, regardless of the activity or country where they are established. Therefore, it will be applicable to all companies of which Naturgy has majority ownership and the ones for whose operation and/or management Naturgy is responsible. Likewise, knowledge and application of it will be promoted by the people or companies that collaborate with Naturgy.

3. Commitments and principles of action

Within the framework of the group's general strategy, specific commitments and principles of action focused on the generation of profit and the creation of value in the long term have been defined.

3.1. Commitment to results

Naturgy's shareholders and investors are among the company's main stakeholders. Therefore, properly managing risks and developing a solid business model that guarantees sustainability and the creation of long-term value are the key aspects of the business.

Commitments:

- Work to obtain a **sustained profitability** adequate to the risk assumed and ensuring that decision-making considers the **levels and risk thresholds approved**.
- Promote **efficient allocation and management of resources** within the framework of continuous improvement of processes.
- Continue incorporating **aspects of sustainability** regarding investors.



3.2. Excellent service

Customers are the main focus of Naturgy's operations. Through active dialogue, the company will provide an agile and efficient service that, in addition to complying with the legal and profitability requirements, is in accordance with their needs.

Commitments:

- Work for the continuous improvement of the **security, reliability and competitiveness** of all products and services, offering the highest level of **quality** possible based on the best available techniques.
- Promote **active and bidirectional communication** to understand the expectations and opinions of customers and adapt Naturgy's responses to their needs.
- Make relationships with customers easier through **simple and efficient operating procedures**.
- Provide **innovative products and services** that promote energy efficiency and contribute to a sustainable society.
- Provide differential value to the customer through products and services adapted to each segment and their needs.
- Apply **technological innovation** and the best available techniques to maintain an efficient, safe and sustainable supply.

3.3. Responsible environmental management

Naturgy is aware of the environmental impact of its activities on their surroundings, so it pays special attention to the protection of the environment and an efficient use of natural resources to meet energy demands. Naturgy goes beyond compliance with its legal and environmental requirements, and makes voluntarily undertakings, involving suppliers, working with different interest groups and promoting the responsible use of energy.

Commitments:

- Contribute to **sustainable development** through eco-efficiency, rational use of natural and energy resources, minimisation of environmental impact, promotion of innovation and use of the best available technologies and processes.
- Contribute to the **mitigation of and adaptation to climate change** through low-carbon and renewable energies, promotion of savings and energy efficiency, application of new technologies.
- Integrate **environmental criteria** in business processes, new projects, activities, products and services, as well as in the selection and evaluation of suppliers.
- Minimise the adverse effects on ecosystems and promote the conservation of **biodiversity**.
- Promote the **efficient and responsible use of energy and natural resources**, establishing activities to improve their management in the framework of the circular economy.



- Guarantee the **prevention of pollution** through continuous improvement and using the best techniques available as well as analysing, controlling and minimising environmental risks.

3.4. Interest in people

For Naturgy, it is essential to promote a quality work environment, based on respect, diversity, and personal and professional development. Likewise, it has an Ethical Code that establishes the guidelines that must direct the ethical behaviour of all its employees in their daily work and, specifically, regarding the relationships and interactions with all the stakeholders.

Commitments:

- Apply best practices in the **identification, recruitment and talent loyalty** necessary for the development of business, maintaining the principles of equity and non-discrimination for any reason (disability, age, gender, previous professional career, etc).
- Encourage **professional development** of people within the talent management model, ensuring that the resources, programmes and tools needed to strengthen their skills and competencies are available to all the professionals.
- Promote a **motivating work environment** that ensures recognition of the culture of effort, the necessary independence to be able to create, develop and innovate, and an appropriate framework for total compensation.
- Ensure the effective implementation of flexibility mechanisms that improve the **balance between professional and personal life** and promote the human and social development of people.
- Encourage **diversity and equality** of opportunities in an environment of respect, listening and permanent dialogue, paying special attention to the inclusion of people with disability and extending this commitment to suppliers and collaborating companies.
- Foster **continuous conversations** between the company and social representatives to gather feedback for decision making.

3.5. Health and safety

Naturgy plans and operates its activities on the basis that nothing is more important than the safety, health, and well-being of people. Because of this, the company goes beyond its legal obligations and requirements, adopting voluntary measures, driving continuous improvements to work conditions and in its management of safety, health and well-being, involving not only the people who make up Naturgy, but also its suppliers, companies and other stakeholders, striving to avoid and prevent accidents and damage to health, providing a safe and healthy environment and promoting health and well-being.

Commitments:

- Guarantee that occupational health and safety are an **individual responsibility that cannot be delegated** which, by way of **collective, visible commitment** are led by senior management and accepted in a proactive, integrated manner by the entire organisation and all its suppliers and collaborating companies.
- Establish health and safety as an individual responsibility that **determines the work** of Naturgy employees,



as well as the activity of its collaborating companies.

- Ensure that **potentially hazardous situations** that may affect the workers, suppliers, clients, the general public and the safety of the installations are appropriately **reported, evaluated and managed**.

- Work to maintain a **risk-free work environment**, integrating occupational risk prevention and actions to protect and promote health and well-being in its business management.

- Establish **learning as a driver of the culture of safety**, through continuous training, accident and incident analysis, dissemination of lessons learned and health education and promotion.

- Integrate **stringent health and safety criteria** in business processes, in new projects, activities, facilities, products and services, as well as part of the process for selecting and evaluating collaborating companies and suppliers, whose non-compliance will determine the start or continuity of the activity.

- Invest in new **health education and health promotion strategies** to enable the workplace to become a vector for transmitting healthy lifestyles for workers and the environment.

- Implement actions aimed at **improving the quality of life, well-being and health** of people in the **communities** where the company operates.

- Provide the necessary **resources and means** to enable compliance with the safety standards established at all times.

3.6. Responsible supply chain

Suppliers and partner companies are essential agents for the optimal operation of the Naturgy value chain, with whom the company seeks to maintain stable, robust and mutually beneficial relationships of trust according to principles of transparency and risk management.

Commitments:

- Spread Naturgy's culture** to the supply chain, transmitting the quest for excellent service, resource efficiency and the company's responsible way of operating, and encouraging the adoption of criteria of sustainability in their daily management.

- Promote **compliance with Naturgy's codes and policies** throughout the supply chain, particularly in the area of human rights, ethics, health and safety and the environment.

- Encourage the hiring of **suppliers of the country or region** where the company develops its activities against similar competitiveness in other locations, supporting the generation of positive social impact.

- Implement practices that improve **traceability and fair trade in raw materials** from origin.



3.7. Social commitment

Naturgy is committed to the economic and social development of the regions in which it carries out its activities, providing knowledge, management capacity, as well as dedicating part of the benefits to social investment. Fluid and permanent dialogue with society enables the company to understand the expectations and interests of the communities where it operates and to become involved in their development.

Commitments:

- Guarantee fluid, two-directional dialogue and promote the involvement of **local communities**, respecting their culture, regulations and environment, to respond adequately and promptly to their concerns.
- Perform social impact assessments of the company's activity to avoid or mitigate potential adverse impact and strengthen their positive effects.
- Develop initiatives for the creation of shared value and positive social impact in energy projects.
- Promote education, training, cultural wealth and inclusion of the most disadvantaged groups through **social investment**.
- **Transfer knowledge and values** to society through collaborative agreements with the academic community and the supply chain.

3.8. Integrity and accountability

Naturgy believes that the trust of its stakeholders is based on integrity, understood as an ethical, honest, responsible and well-intentioned behaviour of each person working in and for the group.

Commitments:

- Reject **corruption, fraud and bribery** in the company's business and establish mechanisms to prevent and address such practices by developing internal channels for reporting irregularities, protecting the identity of the reporter.
- Comply with the **applicable national and international laws and regulations** in the countries where the company operates, particularly the principles of the Universal Declaration of Human Rights of the United Nations and in the International Labour Organisation (ILO) declaration, the principles of the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Principles of Corporate Governance.
- Adopt responsible management practices and comply with all **tax obligations** in all jurisdictions in which the company operates, accepting the commitment to accountability and collaboration with the corresponding tax agencies.
- **Compete fairly in the market**, rejecting deceitful, fraudulent and malicious conduct that leads the company to obtain undue advantages.
- Promote **transparent information**, and responsible, truthful, effective, integral and timely communication, providing regular financial and non-financial information about the company's actions.
- Maintain an open **dialogue with stakeholders** through appropriate and accessible channels.



4. Responsibilities

In accordance with its regulation, approval of Naturgy's Corporate Responsibility Policy is the responsibility of the **Board of Directors**, which also receives information about the implementation and general monitoring of said policy at least once a year.

Ultimately, supervision of compliance with the Corporate Responsibility Policy falls upon the Board of Directors, who may delegate aspects of such supervision to their Committees, including the following:

- a) Supervision of compliance with the company's internal codes of conduct and corporate governance rules.
- b) Regular assessment of the suitability of the company's corporate governance system to comply with its mission to promote social interest and take the legitimate interests of other stakeholders into account, as appropriate.
- c) Review of the company's corporate social responsibility, ensuring that it focuses on the creation of value.
- d) Compliance with corporate social responsibility strategies and assessment of the degree of compliance.
- e) Supervision and assessment of relationship processes with the different stakeholders.
- f) Assessment of all aspects of the company's non-financial risks - including operations, technologies, legal, social, environmental, political and reputation matters.
- g) Coordination of the process for reporting non-financial and diversity-related information according to the applicable regulations and international standards.

The Board of Directors is also responsible for leading the effective integration of Corporate Responsibility in the company's strategy and its daily management.

The Management of the company is responsible for ensuring the proper implementation and monitoring of the commitments assumed in the Policy, as well as promoting dissemination, knowledge and compliance with the CR Policy.

The **directors, managers and other persons making up the company** are required to know, understand and comply with the commitments contained in this Policy. The group will promote and encourage its suppliers and collaborating companies to adopt the behavioural guidelines defined in this Policy.

5. Monitoring and supervision systems

The Management of the company will ensure compliance with the Policy through the approval of specific plans.

Annually, through the Corporate Responsibility Report and the Annual Report they will externally inform on the progress made with the implementation of this policy.

The Board of Directors, by itself, or through its Committees carries out the supervision of aspects such as the Health and Safety, Equality, Compliance and Risks of the Company.



Specifically and in regard to the Company's Risks, both financial and non-financial risks are included in the Naturgy Risk Map.

In addition, the Risk and Insurance Division identifies, monitors and controls the Group's overall risk profile. To do so, and in coordination with the businesses, it defines policies and metrics and, in case of observing levels of exposure or trends that may exceed the established tolerance, provides the appropriate indications.

The Compliance Division is responsible for establishing the regulatory compliance policy and its control models, as well as promoting a compliance culture. Likewise, it is responsible for the model of Naturgy's Code of Ethics.

The internal Auditing Division is responsible for continuous revision and improvement of the group's Internal Control System, as well as for ensuring compliance with the external and internal regulations and control guidelines established, in order to safeguard the efficiency and efficacy of operations and to mitigate the main risks of each of the areas of the group; particularly operational risks, corruption, fraud and legal risks.

6. Approval

This Naturgy Corporate Responsibility Policy has been approved by the Board of Directors of Naturgy on January 29, 2019.

A decorative graphic on the left side of the page consisting of white, wavy contour lines on a light gray background, resembling a topographic map. The lines are more densely packed in some areas and more spread out in others, creating a sense of depth and movement.

APPENDIX B

Project Commitments & Compliance Requirements

SSD-9550 Condition	Condition Wording	Project Commitment
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT		
Condition A1	In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, commissioning, upgrading, operation, rehabilitation or decommissioning of the development.	Full implementation of a range of strategies, programs and plans including but not limited to this EMS and its subplans.
TERMS OF CONSENT		
Condition A2	The development may only be carried out: <ul style="list-style-type: none"> (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 1. 	The Project will be carried out in accordance with Condition A2.
Condition A3	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department’s assessment of: <ul style="list-style-type: none"> (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. 	The Proponent will ensure compliance with Condition A3 by preparation and submission of this EMS, its subplans and updating of any documentation to ensure compliance. All measures in this EMS and its subplans will be adhered to.
Condition A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(i) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	The Proponent will ensure compliance with Condition A4 and refer to the most recent documentation.
UPGRADING OF SOLAR PANELS AND ANCILLIARY INFRASTRUCTURE		
Condition A5	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 (including, but not limited to, the method of disposal for redundant solar panels) to the Planning Secretary incorporating the proposed upgrades.	The Proponent will ensure compliance with Condition A5 should upgrading of solar panels or infrastructure be required. The Planning Secretary will be notified.
STRUCTURAL ADEQUACY		

SSD-9550 Condition	Condition Wording	Project Commitment
Condition A6	<p>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 <i>National Construction Code</i>.</p> <p>NOTES:</p> <ul style="list-style-type: none"> • 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. 	All new buildings, structures, alterations or additions to buildings and structures will comply with the requirements of the <i>National Construction Code</i> per Condition A6.
DEMOLITION		
Condition A7	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	Any demolition will be carried out in accordance with Condition A7.
PROTECTION OF PUBLIC INFRASTRUCTURE		
Condition A8	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> (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. <p>NOTE: 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.</p>	The Proponent will comply with Condition A8 should also repairs or relocations of public infrastructure be required as a result of the Project.
OPERATION OF PLANT AND EQUIPMENT		
Condition A9	<p>All plant and equipment used on site, or in connection with the development, must be:</p> <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	All plant and equipment will be maintained and operated appropriately in accordance with this EMS and its subplans.
SUBDIVISION		
Condition A10	<p>The Applicant may subdivide land comprising the site for the purposes of carrying out the development as identified in APPENDIX 4 and in accordance with the requirements of the EP&A Act, EP&A Regulation and the <i>Conveyancing Act 1919</i> (NSW).</p> <p>NOTES:</p> <ul style="list-style-type: none"> • 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. 	If subdivision is required, the relevant legislation and regulations will be adhered to in accordance with Condition A10.
COMPLIANCE		

SSD-9550 Condition	Condition Wording	Project Commitment
Condition A11	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Inductions to ensure compliance with the Conditions of SSD-9550 will be mandatory for all staff, in accordance with this EMS. All subplans will be made available and a CEMP will be in place to further guide compliance during construction activities.
COMMUNITY ENHANCEMENT		
Condition A14	<p>Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with:</p> <ul style="list-style-type: none"> (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the letter of offer dated 26 March 2021, which are summarised in Appendix 3 	A VPA will be entered into with Greater Hume Shire Council prior to construction.
LANDSCAPING – VEGETATION BUFFER		
Condition B10	<p>The Applicant must establish and maintain a vegetation buffer (landscape screening) as described in the EIS and at the locations identified in Appendix 6. The landscape screening must:</p> <ul style="list-style-type: none"> (a) be planted prior to commencing operation; (b) be comprised of species that are endemic to the area; (c) be designed and maintained in accordance with RFS’s <i>Planning for Bushfire Protection 2019</i> (or equivalent); and (d) be properly and actively maintained with appropriate weed management and replacement of failed plantings (e) unless the Planning Secretary agrees otherwise. 	The Landscape Plan (MLA 2024) will ensure compliance with Condition B10.
Condition B11	The Applicant must take all reasonable steps to provide additional vegetation screening or scattered trees at residences (receivers LIN001, 004, 005, 007, DRM008, NIK003 and MLA01), in consultation with the landowners, to ensure that views of the development are screened.	The Landscape Plan (MLA 2024) will ensure compliance with Condition B11.
LANDSCAPING – LANDSCAPE PLAN		
Condition B12	<p>Prior to the issue of any construction certificate, the Applicant must prepare a detailed Landscape Plan. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared to a minimum scale of 1:1000; (b) describe measures including: <ul style="list-style-type: none"> (v) width of planting; (ii) density of plantings; (iii) timing of planting, considering appropriate seasonal windows to maximise success; and (iv) maintenance and monitoring requirements, including monthly monitoring for the first 12 months and replacement of mortalities for the first 5 years; and 	The Landscape Plan (MLA 2024) has been developed and implemented in accordance with this condition.

SSD-9550 Condition	Condition Wording	Project Commitment
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- (c) provide details of the landscape screening required by condition B10 and B11, including:
 - (v) how the Applicant will provide targeted landscape screening on the Site and at residences in consultation with adjacent landowners; and
 - (ii) demonstrating that the landscape screening is of a width and depth sufficient to screen the views of the development from adjacent properties and roads; and
- (d) provide details of how any hollow-bearing trees proposed to be removed may be reasonably and feasibly reincorporated on the Site.

The Applicant must implement the Landscape Plan.

LAND MANAGEMENT

Condition B13	The Applicant must maintain the agricultural land capability of the site, including: <ul style="list-style-type: none"> (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. 	The agricultural land capability of the site will be maintained per Condition B13, in accordance with the Rehabilitation and Decommissioning Plan (ELA 2024).
Condition B14	The Applicant must maintain the site fencing to ensure the fencing remains stock proof.	Stock-proof fencing will be maintained and monitored under the Biodiversity Management Plan (BMP) (ELA 2024a) and Rehabilitation and Decommissioning Plan (ELA 2024b). Regular checks will be carried out to ensure stock-proof fencing is protective of no-go zones and riparian areas/plantings per BMP (ELA 2024a).

BIODIVERSITY – VEGETATION CLEARANCE

Condition B15	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	The Proponent commits to the implementation of the BMP (ELA 2024a) which includes suitable no-go zones, protected by stock-proof fencing, which will be regularly monitored. Clearance areas will be monitored to achieve compliance with the EIS.
Condition B16	The Applicant must make all reasonable efforts to replace the removed paddock trees with the same number of trees of a similar species on the site. These replacement trees are to be planted within the area of the site identified for riparian planting and/or within the vegetation buffer.	Appropriate numbers and species of replacement trees, with respect to the removed paddock trees, have been considered and will be carried out in accordance with the Landscape Plan

SSD-9550 Condition	Condition Wording	Project Commitment
		(MLA 2024). Areas of retained vegetation and riparian areas will be protected and monitored per the BMP (ELA 2024a).
BIODIVERSITY OFFSETS		
Condition B17	Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 of the Consent Conditions.	Required biodiversity credits have been retired.
BIODIVERSITY MANAGEMENT PLAN		
B19	<p>Prior to carrying out any development that could directly or indirectly impact biodiversity values, 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:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the Biodiversity Development Assessment Report dated 7 August 2023, including incorporation of the measures described in the Roadside Tree Assessment (ArborViews, 2023) (b) include a description of the measures and timeframes that would be implemented for: <ul style="list-style-type: none"> (i) protecting vegetation and fauna habitat outside the approved disturbance areas (ii) managing and enhancing the remnant vegetation and fauna habitat on site (iii) avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna (iv) minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development (v) minimising the impacts to fauna on site and implementing fauna management protocols (vi) rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site’s ecology and conditions (vii) maximising the salvage of vegetative and soil resources within the approved disturbance 	The Project’s BMP has been prepared and approved. The Proponent commits to implementing the BMP and complying with the Consent Conditions.

SSD-9550 Condition	Condition Wording	Project Commitment
	<p>area for beneficial reuse in the enhancement or the rehabilitation of the site</p> <p>(viii) controlling weeds, feral pests and pathogens</p> <p>(c) include a program to monitor and report on the effectiveness of mitigation measures</p> <p>(d) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site</p> <p>(e) include details of who would be responsible for monitoring, reviewing and implementing the plan.</p> <p>Following the Planning Secretary’s approval, the Applicant must implement the Biodiversity Management Plan.</p>	

AMENITY – CONSTRUCTION, UPGRADING AND DECOMMISSIONING HOURS

<p>Condition B20</p>	<p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:</p> <ul style="list-style-type: none"> the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; and emergency work to avoid the loss of life, property and/or material harm to the environment. 	<p>No work will be undertaken outside of the standard times under Condition B20, without prior approval of the Planning Secretary.</p>
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VARIATION OF CONSTRUCTION HOURS

<p>Condition B21</p>	<p>The hours of construction activities specified in condition B20 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be:</p> <p>(a) considered on a case-by-case or activity-specific basis;</p> <p>(b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours;</p> <p>(c) (accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Council (and other relevant agencies) has been or will be undertaken;</p>	<p>Construction hours will not be varied from the approved hours under Condition B20 without prior approval of the secretary.</p>
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SSD-9550 Condition	Condition Wording	Project Commitment
	<ul style="list-style-type: none"> (d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (e) accompanied by a noise impact assessment consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or latest version. 	
NOISE		
Condition B22	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (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) $L_{Aeq, 15min}$ to be determined in accordance with the procedures in the <i>NSW Noise Policy for Industry</i> (EPA, 2017) at any non-associated residence. 	<p>The Project will be carried out in accordance with the best practice requirements outlined in the <i>Draft Construction Noise Guideline</i> (EPA 2020) (or latest version, if applicable) which supersedes the <i>Interim Construction Noise Guideline</i>.</p> <p>Noise will not exceed the limit in accordance with Condition B22, and will be monitored and managed in accordance with the NVMP (MDA 2024).</p>
DUST		
Condition B23	<p>The Applicant must ensure all activities occurring at the Site are carried out in a manner that minimises dust including the emission of wind-blown or traffic generated dust.</p>	<p>Condition B23 will be adhered to with measures under the Sediment and Erosion Control Plan (ELA 2024) and the TMP (PDC, 2024). The Proponent and EPC Contractor will be responsible for providing regular updates to the community on the upcoming construction works, especially in relation to roadworks and transport activities that could generate dust and emissions. Water spraying will be carried out in relevant locations for dust suppression during construction. Implementation of actions to comply with condition B23 will occur in accordance with the CEMP.</p>
VISUAL		
Condition B24	<p>The Applicant must:</p> <ul style="list-style-type: none"> (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 	<p>The Proponent and EPC Contractor will be responsible for adhering to Condition B24 including minimising potential for glare and reflection, through detailed design and measures described in the EIS. Materials and colour of onsite infrastructure would, where practical, be non-reflective and in keeping with the materials and colouring of existing</p>

SSD-9550 Condition	Condition Wording	Project Commitment
	(c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	infrastructure or of a colour that will blend with the landscape.
LIGHTING		
Condition B25	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> (v) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; and (iii) complies with Australian/New Zealand Standard AS/NZS 4282:2019 – <i>Control of Obtrusive Effects of Outdoor Lighting</i>, or the latest version. 	<p>The Proponent and EPC Contractor commits to Condition B24 including minimising potential for glare and reflection, through detailed design and measures described in the EIS. External lighting for the Project will be installed around buildings and in high-voltage substation, only used in rare instances where staff are working approved nighttime hours. Security lighting will be installed at critical points around the site perimeter and activated only if the system detects unauthorised entry. Temporary lighting (e.g. required for road updates) may be required for night work, and is necessary for safety reasons.</p>
HERITAGE – PROTECTION OF HERITAGE ITEMS		
Condition B26	<p>The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved Development footprint.</p>	<p>Direct impacts will be limited to the development footprint. Unexpected finds will be managed under the unexpected finds policy within the HMP (Past Traces 2024).</p>
SOIL AND WATER		
Condition B28	<p>The Applicant must ensure that it has sufficient water for all stages of the development, including volumes required for dust suppression and the maintenance of landscape screening for the life of the development.</p> <p><small>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.</small></p>	<p>The Proponent has received confirmation from Greater Hume Council (18 November 2022) stating that 17 ML of water will be available annually during construction (daily consumption 48,000 L), and that 1.8 ML will be available annually during operation (daily consumption 5,000 L) for the purposes of the Project.</p>
Condition B29	<p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p>	<p>The Project will ensure that the requirements of Condition B29 are implemented and adhered to. A water quality management program is provided under the SEMP (ELA 2024).</p>
Condition B30	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise any soil erosion and control sediment generation; (b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in 	<p>The Project will ensure that the requirements of Condition B30 are implemented and adhered to, under the SEMP (ELA 2024).</p>

SSD-9550 Condition	Condition Wording	Project Commitment
	<p>accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and the <i>Managing Urban Stormwater: Soils and construction – Volume 2A manual</i> (Landcom, 2008), or their latest versions;</p> <p>(c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site;</p> <p>(d) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site;</p> <p>(e) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</p> <p>(f) (ensure all works within waterfront land is undertaken in accordance with <i>Guidelines for Controlled Activities on Waterfront Land</i> (DPE, 2022), unless the Planning Secretary agrees otherwise.</p>	

HAZARDS – STORAGE AND HANDLING OF DANGEROUS GOODS

Condition B31	<p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.</p> <p>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.</p>	Condition B31 will be adhered to in accordance with the Emergency Response Plan (Riskcon Engineering 2024). Monitoring and storage locations are specified under this plan.
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HAZARDS – OPERATING CONDITIONS

Condition B32	<p>The Applicant must:</p> <p>(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;</p> <p>(b) ensure that the development:</p> <p>(v) complies with the relevant asset protection requirements in the RFS’s <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset Protection Zones; and</p> <p>(ii) is suitably equipped to respond to any fires on site, including provision of four 10,000 litre water supply tanks fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection;</p>	Condition B32 will be adhered to in accordance with the Emergency Response Plan (Riskcon Engineering 2024).
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SSD-9550 Condition	Condition Wording	Project Commitment
	<p>(iii) includes a 10 metre defendable space around the perimeter that permits unobstructed vehicle access; and</p> <p>(iv) manages the defendable space and solar array areas as an Asset Protection Zone; and</p> <p>(c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.</p>	

HAZARDS – EMERGENCY PLAN

<p>Condition B33</p>	<p>Prior to commencing construction of the solar farm, the Applicant must develop and implement a comprehensive Emergency Plan and detail emergency procedures for the development, and provide a copy of the plan to the local Fire Control Centre and FRNSW. The plan must:</p> <ul style="list-style-type: none"> (a) be consistent with the Department’s Hazardous Industry Planning Advisory Paper No. 1, ‘Emergency Planning’ and RFS’s <i>Planning for Bushfire Protection 2019</i> (or equivalent); (b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; (c) include availability of fire suppression equipment, access and water; (d) 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; (e) include fire and bushfire emergency management planning, including: <ul style="list-style-type: none"> (v) details of the location, management and maintenance of the Asset Protection Zone; (ii) a list of works that must not be carried out during a total fire ban; and (iii) details of how RFS would be notified, and procedures that would be implemented, in the event that: <ul style="list-style-type: none"> • 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; (f) detail specific response measures in the case of flood to ensure site safety; 	<p>Condition B33 will be adhered to by the Proponent and EPC Contractor in accordance with the Emergency Response Plan (Riskcon Engineering 2024).</p>
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SSD-9550 Condition	Condition Wording	Project Commitment
	<ul style="list-style-type: none"> (g) describe the specific emergency exit routes to be used in the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriageway); and (h) include an Emergency Services Information Package in accordance with Emergency services information package and tactical fire plans (FRNSW, 2019), to the satisfaction of FRNSW. 	

WASTE

Condition B35	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise waste generated by the development; (b) classify all waste generated on site in accordance with the EPA’s <i>Waste Classification Guidelines 2014</i> (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 site as soon as practicable, and sure it is reused, recycled or sent to an appropriately licensed facility for disposal (in consultation with Council for use of Council facilities). 	<p>A Waste Management Plan (WMP) (Coffey 2024) has been prepared, and will be implemented by the Proponent to ensure appropriate management of waste on site. The monitoring details of the WMP are summarised in Table 6-3 and will be included in the CEMP to guide implementation.</p>
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ACCOMODATION AND EMPLOYMENT STRATEGY

Condition B36	<p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development. This strategy must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council and informed by consultation with local accommodation and employment service providers; (b) propose measures to ensure there is sufficient accommodation for the workforce associated with the development; (c) consider the cumulative impacts associated with other State significant development projects in the area; (d) investigate options for prioritising the employment of local workers and use of local businesses during construction and operation of the development, where feasible; (e) give consideration to strategies that leave a positive community legacy and maximise local economic contribution; and (f) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and 	<p>Condition B36 will be adhered to in accordance with the Accommodation and Employment Strategy (RPS 2024).</p>
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SSD-9550 Condition	Condition Wording	Project Commitment
	<p>review during construction upgrading and decommissioning.</p> <p>The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary a minimum of 6 months prior to commencement of construction and implement the plan throughout construction.</p>	

DECOMMISSIONING AND REHABILITATION

Condition B37	<p>Within 3 years of the commencement of operation, the Applicant must prepare a Decommissioning and Rehabilitation Plan for the development which shall be updated by the Applicant half-way through the operational life of the project, and within 2 years prior to decommissioning. The Plan must:</p> <ul style="list-style-type: none"> (a) include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 3 below; and (b) describe the measures that would be implemented to: <ul style="list-style-type: none"> (v) decommission the development and rehabilitate the site in accordance with the objectives in Table 3; (ii) minimise and manage the waste generated by the decommissioning of the development; (iii) include a program to monitor and report on the implementation of these measures against the detailed completion criteria; and (iv) ensure that best practice is employed in respect of utilising available recycling technologies. 	Condition B37 will be implemented and adhered to under the Rehabilitation and Decommissioning Plan (ELA 2024).
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Schedule 2 Part C – Environmental Management

ENVIRONMENTAL MANAGEMENT STRATEGY

Condition C1	<p>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:</p> <ul style="list-style-type: none"> (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: 	<p>This EMS includes the strategic framework for the development, provided in Section 2.</p> <p>Applicable statutory approvals are identified in this EMS (Section 3).</p> <p>Roles and responsibilities of key personnel involved in the implementation of this EMS are described in Section 4.</p> <p>Communication procedures are provided in Section 5 of this EMS.</p>
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SSD-9550 Condition	Condition Wording	Project Commitment
	(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;	
	(ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and respond to emergencies; and	Communication procedures are provided in Section 5 of this EMS. Non-compliance procedures (Section 6) and emergency response protocols (Section 8) are also addressed in this EMS.
	(e) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and	Additional strategies, plans and programs required under SSD-9550 are described in Figure 2-1 and Appendix B of this EMS. Monitoring and reporting requirements are summarised in Table 6-3, noting that details will be included in the Contractor’s CEMP and relevant subplans which must be read and implemented full.
	(v) 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.	Table 6-3 describes the monitoring requirements and associated subplans. Subplans should be referred to for full detail. The purpose of the Contractor’s CEMP is to guide detailed monitoring, reporting and procedures required for compliance with this EMS and Consent Conditions. The CEMP and the relevant subplans will be reviewed and made available prior to relevant works commencing.

REVISION OF STRATEGIES, PLANS AND PROGRAMS

Condition C2	<p>The Applicant must:</p> <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (i) submission of an incident report under condition C10 of Schedule 2; (ii) submission of an audit report under condition C14 of Schedule 2; or (iii) any modification to the conditions of this consent. 	<p>Condition C2 is addressed in Section 9. The Proponent will ensure that this EMS and any related strategies, plans or programs prepared for the Project will be reviewed and updated in accordance with this condition.</p> <p>If any strategy, plan or program including this EMS is updated then the Proponent will comply with Condition C3.</p>
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UPDATING AND STAGING OF STRATEGIES, PLANS OR PROGRAMS

SSD-9550 Condition	Condition Wording	Project Commitment
Condition C3	<p>With the approval of the Planning Secretary, the development may be staged and the Applicant may:</p> <ul style="list-style-type: none"> (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 	Any updated Strategies, Plans and Programs will be submitted to the Planning Secretary for approval in accordance with Condition C3 I.
Condition C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	The Proponent will stage or update Strategies, Plans or Programs in consultation with the relevant identified party, unless the Secretary has agreed that the consultation is not required.
Condition C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	All strategies, plan or program including this EMS will be clearly labelled with version and date, and the most recent version will supersede any previous version(s). The update will also be published on the Project website.
Condition C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	There are no known staging requirements for this strategy.
NOTIFICATION OF DEPARTMENT		
Condition C7	<p>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.</p> <p>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</p>	This condition will be adhered to by the Proponent.

SSD-9550 Condition	Condition Wording	Project Commitment
	the development that would be carried out during the relevant stage.	
FINAL LAYOUT PLANS		
Condition C8	<p>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 including details on the siting of solar panels and ancillary infrastructure.</p> <p>The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.</p>	Detailed final layout plans of the Project, following detailed design, will be submitted to the Department via the Major Projects website, prior to the construction.
WORK AS EXECUTED PLANS		
Condition C9	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 to the Department via the Major Projects website.	On completion of construction, Work As Executed Plans will be submitted to the Department via the Major Projects website prior to operations or any upgrades.
INCIDENT NOTIFICATION		
Condition C10	<p>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 8.</p>	<p>The Proponent will notify the Department in writing via the Major Projects website of any incident as soon as practicable, per Section 8.1 of this EMS and Appendix 8 of the Consent Conditions.</p> <p>An incident is defined as <i>“An occurrence or set of circumstances that causes or threatens to cause material harm to the environment.”</i></p>
NON-COMPLIANCE NOTIFICATION		
Condition C11	The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance.	<p>The Proponent will submit a written notification to the Department via the Major Project website, within seven calendar days of becoming aware of any non-compliance per Section 6.4 of this EMS.</p> <p>A non-compliance is defined as: <i>‘An occurrence, set of circumstances or development that is a breach of this consent but is not an incident.</i></p>
Condition C12	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.	Any non-compliance notification submitted to the Department under Condition C11 will address the requirements of Condition C12, per Section 6.4 of this EMS.
Condition C13	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	The Proponent notes that incident reports that are also non-compliance do not also need to be notified as a non-compliance.

SSD-9550 Condition	Condition Wording	Project Commitment
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The incident notification procedures will be followed in accordance with Condition C10.

INDEPENDENT ENVIRONMENTAL AUDIT

Condition C14	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.	Independent Audits will be carried out in accordance with Condition C14 to C19, as described in Section 6.2.1 of this EMS.
Condition C15	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	
Condition C16	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition C14 of Schedule 2 upon giving at least 4 weeks' notice to the Applicant at the date upon which the audit must be commenced.	
Condition C17	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 C14 of Schedule 2 of this consent, or condition C16 of Schedule 2 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.	
Condition C18	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 <i>Independent Audit Post Approval Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	
Condition C19	Notwithstanding the requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> , 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.	

ACCESS TO INFORMATION

SSD-9550 Condition	Condition Wording	Project Commitment
Condition C20	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent (other than the Emergency Plan); (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) compliance reports; (ix) any independent environmental audit, and the Applicant’s response to the recommendations in any audit; and (x) any other matter required by the Planning Secretary; and (b) keep this information up to date. 	<p>This information will be made available on the Project website in accordance with Section 5.2 of this EMS.</p>



APPENDIX C

SSD-9550

Development
Consent

The Development Consent Conditions (issued by the Independent Planning Commission on 15 December 2023) are available at the following link:

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9550%2120231215T031113.973%20GMT>

The background of the page is a light gray color with a white topographic map pattern on the left side. The map features several concentric, irregular lines that represent contour lines, creating a sense of depth and texture. The lines are more densely packed in some areas and more spread out in others, typical of a topographic map.

APPENDIX D

Formal Complaint Form Template

INCIDENT/COMPLAINT FORM

Name:

Date:

Time:

Postal Address:

Phone:

Email:

DGWF Representative:

Supragya Sharma

Please tick preferred contact method

Complaint Receipt Number:

E SMS PH Mail

RC

Are you acting on behalf of the complainant? Y N

Relationship to the complainant:

Incident Type (please indicate the general type of incident, e.g. visual, traffic, TV/radio interference, farming interference) For noise – please complete the Noise Complaint Form:

Date and time of incident:

Incident Location (Property Reference Number – if applicable):

Weather Conditions and Operational Conditions (Temperature, wind direction and speed, general conditions, during operation or construction of the wind farm):

Source of weather conditions (Web page, Personal weather station, Observation)

Frequency of the Issue:

Free Call: 1800 457 181 Email: darlingtonwindfam@globalpower-generation.com.au

Website: <https://darlingtonwindfarm.globalpower-generation.com.au>

Mail: Global Power Generation Australia, Suite A, Level 3, 73 Northbourne Avenue, Canberra ACT 2601

Source of the Issue (if known):

Full Description of the Issue. How does this affect you?:

Any Additional Information (Please include your preferred outcome):

Attached Documents:

Has this form been seen and approved by both parties?

YES / NO

Signature of Complainant:

Signature of DGWF Representative:

Supragya Sharma

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APPENDIX E

Complaints Register

COMPLAINTS REGISTER

Date	Description of complaint	Name of Complainant	Address	Action Taken	Status
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APPENDIX F

Staging Plans

**Suite A, Level 3, 73 Northbourne Avenue
Canberra
ACT 2601
1800 457 181**

Department of Planning, Housing & Infrastructure

Level 30, 4 Paramatta Square
Paramatta
NSW 2150

Attention: Keren Halliday

Ref: Glenellen Solar Farm (SSD-9550)

Dear Keren,

Glenellen Solar Farm (SSD 9550) – Request for Staging of Management Plans

Glenellen Solar Farm Pty Ltd (the 'Proponent') writes concerning the Glenellen Solar Farm (the 'Project'), which received development consent by the NSW IPC on the 15th of December 2023 ('Consent').

Sequel to *Condition C3, Schedule 2* of the consent and to enable further engagement with TfNSW on yet-to-be-determined OSOM details, the Proponent writes to request permission to stage the Traffic Management Plan as detailed below.

- **Stage 1a:** Road upgrades or maintenance works to public road network as outlined in Appendix 1 of Consent, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying;
- **Stage 1b:** Solar farm construction commencement;
- **Stage 1c:** Solar farm construction continuation, including movement of heavy vehicles requiring escort during construction as described in Condition B1 of Schedule 2 of Consent.
- **Stage 2:** Solar Farm Operation; and
- **Stage 3:** Solar Farm Decommissioning at end of life.

Sincerely,



Guillermo Alonso
Director, Projects Development
GLOBAL POWER GENERATION AUSTRALIA Pty Ltd

A decorative graphic on the left side of the page consisting of white, irregular contour lines on a light gray background, resembling a topographic map. The lines are more densely packed in some areas and more spread out in others, creating a sense of depth and movement.

APPENDIX G

Consultation Log

CONSULTATION LOG

Date	Description	ELA Response
6 March 2024	Feedback received from DPPI on Glenellen EMS Version 2. Comment log and markup provided by DPPI.	Updated EMS (Version 4, 4 April 2024) addressed comments. Comment log and Version 4 were provided to Proponent for resubmission, noting that EMS will be subject to future updates to reference relevant measures and monitoring under subplans which have not yet been finalised.
23 May 2024	Feedback received from DPPI on Glenellen EMS Version 4 (dated 4 April 2024). Comment log and markup provided by DPPI.	Final updated EMS (Version 5) issued addressing comments. Comment log and Version 5 provided to Proponent for resubmission. The EMS is considered final, and the Construction Environmental Management Plan (CEMP) for the Project should be referred to for detailed implementation including monitoring and actions under sub-plans.
16 August 2024	Feedback received from DPPI on Glenellen EMS Version 5 (dated 25 July 2024). Comment log provided by DPPI.	<p>The following comments from DPPI were addressed:</p> <ul style="list-style-type: none"> • Amend Figure 1.2 – Figure 1.2 was updated as requested to show that alternate access points are for emergency purposes. • The staging in Section 1.2 should refer to Appendix 5 of the consent which describes the required road upgrades – Reference to Appendix 5 of Consent included • Condition B14: Amend the commitment to fully address biodiversity issues (stock proof fencing, include monitoring of plantings and fencing) – The BMP has been approved. Commitment in EMS updated to commit to installation and monitoring of stock-proof fencing in accordance with BMP and Condition B14. • Condition B16: This is not adequately addressed in BMP. Include commitment to replace the removed paddock trees with the at least same number of similar species on site – Included commitment in Appendix B; updated for consistency with approved BMP and Landscape Plan. • Condition B35: Finalise EMS when monitoring details are available – High level Waste Management Plan (WMP) monitoring and reporting factors now included in EMS, however WMP and/or must be referenced in full by contractor. • Condition C1e (i)-(v): The EMS should be finalised once the sub plans are complete to ensure all relevant requirements are addressed – Reference updated to refer to relevant subplans and CEMP where detailed monitoring requirements are held.

Department of Planning, Housing and Infrastructure



Our ref: SSD-9550-PA-5

Supragya Sharma
Project Developer
Global Power Generation Australia Pty Ltd
Suite A, Level 3, 73 Northbourne Avenue
Canberra, ACT, 2601
07/03/2024

Subject: Glenellen Solar - Environmental Management Strategy

Dear Mrs. Sharma

I refer to the Environmental Management Strategy submitted to the Department of Planning, Housing and Infrastructure (the Department) as required under the consent for the Glenellen Solar Farm. After careful consideration, the Department is requesting that you provide additional information.

You are requested to submit a revised document that addresses the actions outlined in the feedback table and marked-up EMS PDF document.

You are requested to provide the information, or notification that the information will not be provided, to the Department by Friday 5 April 2024. If you are unable to provide the requested information within this timeframe, you are required to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Keren Halliday, who can be contacted on 02 8289 6444.

Yours sincerely

A handwritten signature in black ink, appearing to read "Wayne Jones".

Wayne Jones
Team Leader - Post Approval
Energy Assessments

As nominee of the Planning Secretary

Department of Planning, Housing and Infrastructure



Our ref: SSD-9550-PA-7

Supragya Sharma
Project Developer Global Power Generation Australia Pty Ltd
Suite A, Level 3, 73 Northbourne Avenue
Canberra ACT 2601
16/08/2024

Subject: Glenellen Solar - Environmental Management Strategy V5

Dear Ms. Sharma

I refer to the Environmental Management Strategy (V5) submitted to the Department of Planning, Housing and Infrastructure (the Department) as required under the consent for the Glenellen Solar Farm. After careful consideration, the Department is requesting that you provide additional information.

You are requested to submit a revised document that addresses the actions outlined in the feedback table. You are requested to provide the information, or notification that the information will not be provided, to the Department by Wednesday 18 September 2024.

If you are unable to provide the requested information within this timeframe, you are required to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Keren Halliday, who can be contacted on 0282896444.

Yours sincerely

A handwritten signature in black ink, appearing to read "Wayne Jones".

Wayne Jones
Team Leader - Post Approval
Energy Assessments

As nominee of the Planning Secretary

Document: Environmental Management Strategy

Revision: Version 4 dated 4 April 2024, [Version 5](#)

Reviewed: Keren Halliday 6 March 2024, [23 May 2024](#),
[14 August 2024](#)

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company Response Version 5 updates Version 6 updates/ response
A1. In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, commissioning, upgrading, operation, rehabilitation or decommissioning of the development.	Yes	Section 3.2 it is stated that all reasonable and feasible measure will be implemented		-
TERMS OF CONSENT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
A2. The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in APPENDIX 1.	Partial Yes	This condition is reproduced in Section 3.2 but there is no clear commitment/statement that the development will be carried out in accordance with these requirements. Included in Appendix B	Include a commitment that the development will be carried out in accordance with this condition.	Commitment provided in Appendix B
TERMS OF CONSENT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
A3. The Applicant must comply with any requirement/s of the Planning 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.	Partial Yes	This condition is reproduced in Section 3.2 but there is no clear commitment/statement that the development will be carried out in accordance with these requirements. Included in Appendix B	Include a commitment that the development will be carried out in accordance with this condition.	Commitment provided in Appendix B
Obligation to minimise harm to the environment	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

A4. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Partial Yes	This condition is reproduced in Section 3.2 but there is no clear commitment/statement that the development will be carried out in accordance with these requirements. Included in Appendix B	Include a commitment that the development will be carried out in accordance with this condition.	Commitment provided in Appendix B
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
A5. 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 (including, but not limited to, the method of disposal for redundant solar panels) to the Planning Secretary incorporating the proposed upgrades.	No Yes	Included in Appendix B	Include a commitment that the development will be carried out in accordance with this condition.	Commitment provided in Appendix B
STRUCTURAL ADEQUACY	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
A6. 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 <i>National Construction Code</i> . <i>Notes:</i> <ul style="list-style-type: none"> 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. 	No Yes	Included in Appendix B	Include a statement that all new buildings and structures will be constructed in accordance with relevant requirements of national codes etc	Commitment provided in Appendix B
DEMOLITION	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
A7. The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	No Yes	Included in Appendix B	Include a commitment that any demolition will be carried out in accordance with this condition.	Commitment provided in Appendix B
PROTECTION OF PUBLIC INFRASTRUCTURE	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

<p>A8. Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p><i>Note: 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.</i></p>	<p>No Yes</p>	<p>Included in Appendix B</p>	<p>Include a commitment that the development will be carried out in accordance with this condition.</p>	<p>Commitment provided in Appendix B</p>
<p>OPERATION OF PLANT AND EQUIPMENT</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>
<p>A9. All plant and equipment used on site, or in connection with the development, must be:</p> <p>(a) maintained in a proper and efficient condition; and operated in a proper and efficient manner.</p>	<p>No Yes</p>	<p>Included in Appendix B</p>	<p>Include a commitment that the development will be carried out in accordance with this condition.</p>	<p>Commitment provided in Appendix B</p>
<p>SUBDIVISION</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>
<p>A10. The Applicant may subdivide land comprising the site for the purposes of carrying out the development as identified in APPENDIX 4 and in accordance with the requirements of the EP&A Act, EP&A Regulation and the <i>Conveyancing Act 1919</i> (NSW).</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <i>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.</i> 	<p>No Yes</p>	<p>Included in Appendix B</p>	<p>Include a commitment that if subdivision is required the relevant legislation, and regulations will be followed.</p>	<p>Commitment provided in Appendix B</p>
<p>COMPLIANCE</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>

A11. The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Partial Yes	Reference is made to all employees and contractors having to complete a site induction but no details are provided on the content. Outline of induction topics provided in Section 6.1	Add details regarding the content of compulsory site inductions and the requirement to comply with the conditions of the consent.	Indicative contents provided in Section 6.1. Construction contractor will develop induction process / contents.
COMMUNITY ENHANCEMENT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
A14. Prior to commencing construction, or other timeframe 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 the terms of the letter of offer dated 26 March 2021, which are summarised in APPENDIX 3	No Yes	Reference included in Appendix B.	Include reference to the VPA.	Included.
SCHEDULE 2 - PART B TRANSPORT Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B1. The Applicant must ensure that the: (c) development does not generate more than: (i) 45 heavy vehicle movements a day during construction, upgrading and decommissioning; and (ii) 11 movements of heavy vehicles requiring escort during construction, upgrading and decommissioning; and (d) length of any vehicles (excluding heavy vehicle requiring escort) used for the development does not exceed 26 metres, unless the Planning Secretary agrees otherwise.	N/A	Addressed in the TMP		
Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B2. The Applicant must keep accurate records of the number of heavy vehicles and vehicles requiring escort entering or leaving the site each day for the duration of the project.	N/A	Addressed in the TMP		
Access Route	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

<p>B3. Unless otherwise agreed by the Planning Secretary, all heavy vehicles associated with the development (including heavy vehicles requiring escort) must travel to and from the site:</p> <p>(a) via Hume Highway, Thurgoona Drive, Union Road, Urana Road, Walla Walla Jindera Road, Lindner Road, and Ortlipp Road and the approved Main Access Point off Ortlipp Road, as identified in Figure 4; and / or</p> <p>(b) from the Ettamogah Rail Hub via Hub Road, Gerogery Road, Wagga Road, Catherine Crescent, Union Road, Urana Road, Walla Walla Jindera Road, Lindner Road, and Ortlipp Road, as identified in Error! Reference source not found.</p>	N/A	Addressed in the TMP		
Access Route	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B4. All heavy vehicles and heavy vehicles requiring escort associated with the development:</p> <p>(a) Are prohibited from using Glenellen Road and Drumwood Road; and</p> <p>(b) are prohibited from moving through, and parking in, the township of Jindera (along Urana Road between Pioneer Drive and Walla Walla Jindera Road) during school zone times of 8am to 9.30am and 2.30pm to 4pm.</p> <p><i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of heavy vehicle requiring escort on the road network.</i></p>	N/A	Addressed in the TMP		
Site Access	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B5. All vehicles associated with the development must enter and exit the site via the Main Access Point off Ortlipp Road, as identified in APPENDIX 1.</p> <p><i>Note: Other site access points may be used for emergency purposes.</i></p>	N/A Partial	Addressed in the TMP	Amend figure 1.2. The alternate access points should be marked for emergency purposes only.	Figure 1.2 updated per request.
Road Upgrades	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B6. Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in APPENDIX 5.</p> <p>Unless the relevant road authority agrees otherwise, these upgrades must comply with the current <i>Austroads Guidelines</i>, <i>Australian Standards</i> and <i>TfNSW supplements</i>, and be carried out to the satisfaction of the relevant roads authority.</p>	N/A	Addressed in the TMP		

Road Maintenance	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B7. The Applicant must, in consultation with the relevant roads authority:</p> <ul style="list-style-type: none"> (a) undertake an independent dilapidation survey to assess the: <ul style="list-style-type: none"> (i) existing condition of Ortlipp Road and Linder Road on the transport route, prior to construction, upgrading or decommissioning works; and (ii) condition of Ortlipp Road and Linder Road on the transport route, following construction, upgrading or decommissioning works; and (b) repair of roads identified in condition B7(a) if dilapidation surveys identify that the road has been damaged due to development-related traffic during construction, upgrading or decommissioning works. <p>If there is a dispute between the Applicant and the relevant roads authority about road repairs required under this condition, then either party may refer the matter to the Planning Secretary for resolution.</p>	N/A	Addressed in the TMP		
Operating Conditions	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B8. The Applicant must ensure:</p> <ul style="list-style-type: none"> (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) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the public road network. 	N/A	Addressed in the TMP		
Traffic Management Plan	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B9. At least 6 months prior to commencing road upgrades identified in condition B6, 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:</p> <ul style="list-style-type: none"> (a) details of the transport route to be used for all 	Partial Partial Partial	Referred to in Section 2.3 as one of the sub plans to the EMS.	The staging needs to address consultation requirements and ensure the TMP is staged appropriately and includes TfNSW and Council	Pending staging information from Construction

<p>development-related traffic;</p> <p>(b) details of the road upgrade works required by condition B6.</p> <p>(c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> (i) details of the dilapidation surveys required by condition B7; (ii) temporary traffic controls, including detours and signage; (iii) scheduling the arrival and departure of heavy vehicles from the site to avoid the PM peak hour where practicable; (iv) notifying the local community about development-related traffic impacts; (v) procedures for receiving and addressing complaints from the community about development-related traffic; (vi) ensuring construction traffic complies with a 40 km/h speed limit along Ortlipp and Lindner Roads; (vii) minimising potential cumulative traffic impacts with other projects in the area; (viii) minimising potential for conflict with school buses and other road users as far as practicable including preventing queuing on the public road network, and avoiding the transport of material along the local bus routes when school buses are in operation, in consultation with local schools; (ix) details of how heavy vehicles and heavy vehicles requiring escort associated with the development will avoid moving through, and parking in, the township of Jindera during school zone times, as required by condition B4(b); (x) measures to minimise dirt tracked onto the public road network from development-related traffic; (xi) details of any 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; <p>encouraging car-pooling or ride sharing by employees;</p> <ul style="list-style-type: none"> (xiii) scheduling of haulage vehicle movements to minimise convoy length or platoons; (xiv) responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; 			<p>requirements. The EMS should be finalized once the TMP has been revised to include staging (to allow for consultation with TfNSW regarding OSOM vehicles).</p> <p><i>Please Refer updated TMP and approved Staging requirements.</i></p> <p>The staging in Section 1.2 should refer to appendix 5 of the consent which describes the required road upgrades</p>	<p>Contractor (not yet awarded). EMS will be subject to future update to include this information.</p> <p>EMS updated to include staging information (Section 1.2). TMP is separate and includes staging information.</p> <p>Corrected reference re: road upgrades to Appendix 5 of Consent</p>
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<ul style="list-style-type: none"> (xv) responding to any emergency repair or maintenance requirements; and (xvi) a traffic management system for managing heavy vehicles requiring escort; (d) a driver's code of conduct that addresses: <ul style="list-style-type: none"> (xvii) driver fatigue; (xviii) procedures to ensure that drivers adhere to the designated transport routes and speed limits; and (xix) procedures to ensure that drivers implement safe driving practices; and (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. <p>Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>				
LANDSCAPING Vegetation Buffer	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B10. The Applicant must establish and maintain a vegetation buffer (landscape screening) as described in the EIS and at the locations identified in Appendix 6. The landscape screening must:</p> <ul style="list-style-type: none"> (a) be planted prior to commencing operation; (b) be comprised of species that are endemic to the area; (c) be designed and maintained in accordance with RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); and (d) be properly and actively maintained with appropriate weed management and replacement of failed plantings <p>unless the Planning Secretary agrees otherwise.</p>	No Yes	Reference included in Appendix B.	<p>Include a commitment that a vegetation buffer will be planted and maintained.</p> <p>Include monitoring of screening in Table 6- 2.</p>	<p>Reference to Landscape Plan and commitment included.</p>
Vegetation Buffer	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B11. The Applicant must take all reasonable steps to provide additional vegetation screening or scattered trees at residences (receivers LIN001, 004, 005, 007, DRM008, NIK003 and MLA01), in consultation with the landowners, to ensure that views of the development are screened.</p>	No Yes	Reference included in Appendix B.	<p>Include a commitment that a vegetation buffer will be planted and maintained.</p> <p>Include monitoring of screening in Table 6- 2.</p>	<p>Reference to Landscape Plan and commitment included.</p>

Landscape Plan	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B12. Prior to the issue of any construction certificate, the Applicant must prepare a detailed Landscape Plan. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared to a minimum scale of 1:1000; (b) describe measures including: <ul style="list-style-type: none"> (i) width of planting; (ii) density of plantings; (iii) timing of planting, considering appropriate seasonal windows to maximise success; and (iv) maintenance and monitoring requirements, including monthly monitoring for the first 12 months and replacement of mortalities for the first 5 years; and (b) provide details of the landscape screening required by condition B10 and B11, including: <ul style="list-style-type: none"> (i) how the Applicant will provide targeted landscape screening on the Site and at residences in consultation with adjacent landowners; and (ii) demonstrating that the landscape screening is of a width and depth sufficient to screen the views of the development from adjacent properties and roads; and (c) provide details of how any hollow-bearing trees proposed to be removed may be reasonably and feasibly reincorporated on the Site. <p>The Applicant must implement the Landscape Plan.</p>	Yes	<p>Referred to in Section 2.3 as one of the sub plans to the EMS.</p> <p>Reference included in Appendix B.</p>	<p>Include a commitment that landscape plan will be developed and implemented in accordance with this condition.</p>	<p>Commitment provided in Appendix B</p>
LAND MANAGEMENT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B13. The Applicant must maintain the agricultural land capability of the site, including:</p> <ul style="list-style-type: none"> (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. 	Partial Yes	<p>Referred to in Section 2.3 as one of the sub plans to the EMS.</p> <p>Reference included in Appendix B.</p>	<p>Include a commitment that the agricultural land capability of the site will be maintained as per this condition.</p>	<p>Included in Appendix B.</p>
LAND MANAGEMENT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

<p>B14. The Applicant must maintain the site fencing to ensure the fencing remains stock proof.</p>	<p>No Yes Partial</p>	<p>Reference included in Appendix B.</p>	<p>Include a commitment that the fencing will be maintained and remain stockproof.</p> <p>Amend the commitment to fully address biodiversity issues.</p> <p>Stock proof fencing will be installed and maintained around the no go areas and riparian zones where plantings are proposed to replace paddock trees. Also include monitoring of plantings and the stock proof fencing</p>	<p>Stock proofing not guaranteed however monitoring of fencing to ensure maximum effectiveness will be provided under the Rehab and Decommissioning Plan. Reference to this included.</p> <p>The BMP has been approved. Commitment in EMS updated to commit to installation and monitoring of stock-proof fencing in accordance with BMP and Condition B14..</p>
<p>BIODIVERSITY Vegetation Clearance</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>
<p>B15. The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.</p>	<p>N/A</p>	<p>To be addressed in the BMP</p>		
<p>Vegetation Clearance</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>
<p>B16. The Applicant must make all reasonable efforts to replace the removed paddock trees with the same number of trees of a similar species on the site. These replacement trees are to be planted within the area of the site identified for riparian planting and/or within the vegetation buffer.</p>	<p>N/A Partial</p>	<p>To be addressed in the BMP This is not addressed adequately in the BMP.</p>	<p>Include a commitment to replace the removed paddock trees with the at least the same number (or more to allow for mortality) of</p>	<p>As above – condition included in Appendix B; EMS response updated to be</p>

			trees of a similar species on the site. The replacement trees are to be planted within the area of the site identified for riparian planting and/or within the vegetation buffer. These areas should also be demarcated with permanent stock proof fencing. Plantings should be monitored for at least 5 years and/or until reaches 3 metres in height and fences maintained for life of project	consistent with approved BMP and Landscape Plan including monitoring.
Biodiversity Offsets	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B17. Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Error! Reference source not found. below.</p> <p>The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Scheme</i> and can be achieved by:</p> <ul style="list-style-type: none"> (a) acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>; (b) making payments into an offset fund that has been developed by the NSW Government; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. 	N/A	To be addressed in the BMP		

Table 1: Ecosystem Credit Requirements

Vegetation Community	PCT ID	Credits Required
Blakely's Red Gum – Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion	277	92
River Red Gum – wallaby grass tall woodland wetland on the outer River Red Gum zone mainly in the Riverina Bioregion	9	13
Scattered Paddock Trees	277	70

Table 2: Species Credit Requirements

Species Credit Species	Credits Required
Southern Myotis (<i>Myotis Macropus</i>)	15
Austral Pillwort (<i>Pilularia novae-hollandiae</i>)	22
Squirrel Glider (<i>Petaurus norfolcensis</i>)	1

Biodiversity Offsets	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B18. Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must provide evidence to the Planning Secretary that biodiversity credits have been retired.	N/A	To be addressed in the BMP		
Biodiversity Management Plan		Document reference and comment	Action required	Company response
B19. Prior to carrying out any development that could directly or indirectly impact biodiversity values, 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: <ul style="list-style-type: none"> (a) be prepared in accordance with the Biodiversity Development Assessment Report dated 7 August 2023, including incorporation of the measures described in the Roadside Tree Assessment (ArborViews, 2023); (b) include a description of the measures and timeframes that would be implemented for: <ul style="list-style-type: none"> (i) protecting vegetation and fauna habitat outside the approved disturbance areas; (ii) managing and enhancing the remnant vegetation and fauna habitat on site; (iii) avoiding the removal of hollow-bearing trees 	N/A	To be addressed in the BMP		

<p>during spring to avoid the main breeding period for hollow-dependant fauna; minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;</p> <p>(v) minimising the impacts to fauna on site and implementing fauna management protocols;</p> <p>(vi) rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site's ecology and conditions;</p> <p>(vii) 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</p> <p>(viii) controlling weeds, feral pests and pathogens;</p> <p>(c) include a program to monitor and report on the effectiveness of mitigation measures;</p> <p>(d) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site; and</p> <p>(e) include details of who would be responsible for monitoring, reviewing and implementing the plan.</p> <p>(iv) Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p>				
<p>AMENITY Construction, Upgrading and Decommissioning Hours</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>
<p>B20. Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:</p> <ul style="list-style-type: none"> the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; and emergency work to avoid the loss of life, property and/or material harm to the environment. 	<p>No Yes</p>	<p>Reference included in Appendix B.</p>	<p>Include reference to operating hours and a commitment that no work will be undertaken outside those times without prior approval of the Secretary.</p>	<p>Commitment in Appendix B added.</p>

Variation of Construction Hours	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B21. The hours of construction activities specified in condition Error! Reference source not found. of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be:</p> <ul style="list-style-type: none"> (a) considered on a case-by-case or activity-specific basis; (b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Council (and other relevant agencies) has been or will be undertaken; (d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (e) accompanied by a noise impact assessment consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or latest version. 	No Yes	Reference included in Appendix B.	Include reference to operating hours and a commitment that no work will be undertaken outside those times without prior approval of the Secretary.	Commitment in Appendix B added.
Noise	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B22. The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (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) $L_{Aeq, 15min}$ to be determined in accordance with the procedures in the <i>NSW Noise Policy for Industry</i> (EPA, 2017) at any non-associated residence. 	Partial Yes	Reference is made to a construction noise and vibration plan but as secretary approval is not required the EMS needs to include a commitment regarding noise. Commitment added to Appendix B	Include a commitment that the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) or its latest version will be followed and noise does not exceed the limit specified during operations.	Commitment in Appendix B to the <i>Draft Construction Noise Guideline</i> (EPA 2020) which supersedes the Interim Guide.

Dust	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B23. The Applicant must ensure all activities occurring at the Site are carried out in a manner that minimises dust including the emission of wind-blown or traffic generated dust.	No Partial Yes	No mention is made of wind blown or traffic generated dust control. Commitment has been included in Appendix B but there are limited details of actions to be undertaken to address. Responsibilities assigned in Table 6.3	Include actions/commitment to ensure this condition is addressed. Detail actions and responsibility to address this condition.	Included responsibility and further details in Appendix B. CEMP will ensure implementation. The proponent and EPC contractor will be responsible.
Visual	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B24. 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.	No Partial Yes	Commitment has been included in Appendix B but there are minimal details of actions to be undertaken to address. Responsibilities assigned in Appendix B.	Include actions/commitment to ensure this condition is addressed. Detail actions and responsibility to address this condition.	Commitment included. Included further commitment and responsibility details. Proponent and EPC contractor will be responsible for this.
Lighting	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B25. The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: (i) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; and (iii) complies with <i>Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i> , or the latest version.	No Partial Yes	Commitment has been included in Appendix B but there are minimal details of actions to be undertaken to address. Responsibilities assigned in Appendix B.	Include actions/commitment to ensure this condition is addressed and will be monitored. Include in Table 6-2. Detail actions and responsibility to address this condition.	Commitment included. Included further commitment and responsibility details. Proponent and EPC

				contractor will be responsible for this.
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HERITAGE Protection of heritage Items	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B26. The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved Development footprint.	Partial Yes	The HMP is described in general. Unexpected finds included in monitoring and commitment included	Reference should be made to unexpected finds procedure in the compulsory induction requirements.	Reference added to Appendix B
Heritage Management Plan	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B27. Prior to carrying out any construction, the Applicant must prepare a Heritage Management Plan for the development and submit it to the Planning Secretary for approval. This plan must: <ul style="list-style-type: none"> (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 Registered Aboriginal Parties; (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> (i) protecting the heritage items located outside the approved Development footprint; salvaging and relocating the heritage items located within the approved Development footprint, as identified in Table 1 of Error! Reference source not found.; (iii) a contingency plan and reporting procedure if: <ul style="list-style-type: none"> • previously unidentified heritage items are found; or • Aboriginal skeletal material is discovered; (iv) 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 (v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (d) include a program to monitor and report on the 	N/A	To be addressed in the HMP		

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	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
Water Supply				
B28. The Applicant must ensure that it has sufficient water for all stages of the development, including volumes required for dust suppression and the maintenance of landscape screening for the life of the development. <i>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.</i>	No Yes	Commitment added to project commitments table in Appendix B	Include details of how sufficient water will be secured for construction and the life of the development.	Commitment included
Water Pollution	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
B29. The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	No Yes	Commitment added to project commitments table in Appendix B	Include actions/commitment to ensure this condition is addressed. Table 6.2 should be updated to include monitoring.	Commitment included
Operating Conditions	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

<p>B30. The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise any soil erosion and control sediment generation; (b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and the <i>Managing Urban Stormwater: Soils and construction - Volume 2A</i> manual (Landcom, 2008), or their latest versions; (c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site; (d) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site; (e) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and (f) ensure all works within waterfront land is undertaken in accordance with <i>Guidelines for Controlled Activities on Waterfront Land</i> (DPE, 2022), unless the Planning Secretary agrees otherwise. 	<p>Partial Yes</p>	<p>Commitment added to project commitments table in Appendix B</p>	<p>Include actions/commitment to ensure all of the requirements of this condition are adequately addressed. Table 6.2 should be updated to include monitoring.</p>	<p>Commitment included. Sediment and erosion control plan not yet available (working draft only).</p> <p>EMS to be updated / details of monitoring included in CEMP to ensure compliance. Contractor will need to reference full subplan for detail regardless.</p>
<p>HAZARDS Storage and Handling of Dangerous Goods</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>
<p>B31. The Applicant must store and handle all chemicals, fuels and oils used on- site in accordance with:</p> <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids. <p>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.</p>	<p>No Yes</p>	<p>Commitment added to project commitments table in Appendix B.</p>	<p>Include actions/commitment to ensure the requirements of this condition are adequately addressed. Table 6.2 should be updated to include monitoring of chemical storage areas.</p>	<p>Commitment included.</p> <p>Details of monitoring pending finalisation of relevant plan.</p>

Operating Conditions	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B32. The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development: <ul style="list-style-type: none"> (i) complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and <i>Standards for Asset Protection Zones</i>; and (ii) is suitably equipped to respond to any fires on site, including provision of four 10,000 litre water supply tanks fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection; (iii) includes a 10 metre defendable space around the perimeter that permits unobstructed vehicle access; and (iv) manages the defendable space and solar array areas as an Asset Protection Zone; and (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. 	<p>No Yes</p>	<p>Commitment added to project commitments table in Appendix B.</p>	<p>Include a section to address this requirement including a commitment to maintain APZs, manage fuel loads, fire fighting equip and water, notification requirements etc Table 6.2 should be updated to include monitoring.</p>	<p>Commitment included.</p> <p>Details of monitoring pending finalisation of relevant plan.</p>
Emergency Plan	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B33. Prior to commencing construction of the solar farm, the Applicant must develop and implement a comprehensive Emergency Plan and detail emergency procedures for the development and provide a copy of the plan to the local Fire Control Centre and FRNSW. The plan must:</p> <ul style="list-style-type: none"> (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, '<i>Emergency Planning</i>' and RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); (b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; (c) include availability of fire suppression equipment, access and water; (d) 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 	<p>No Yes</p>	<p>Commitment added to project commitments table in Appendix B.</p>	<p>Include a commitment to address the requirements of this condition. Table 6.2 should be updated to include monitoring.</p>	<p>Commitment included.</p> <p>Details of monitoring pending finalisation of relevant plan.</p>

<p>emergency;</p> <p>(e) include fire and bushfire emergency management planning, including:</p> <ul style="list-style-type: none"> (i) details of the location, management and maintenance of the Asset Protection Zone; (ii) a list of works that must not be carried out during a total fire ban; and (iii) details of how RFS would be notified, and procedures that would be implemented, in the event that: <ul style="list-style-type: none"> • 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; <p>(f) detail specific response measures in the case of flood to ensure site safety;</p> <p>(g) describe the specific emergency exit routes to be used in the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriageway); and</p> <p>(h) include an Emergency Services Information Package in accordance with <i>Emergency services information package and tactical fire plans</i></p> <ul style="list-style-type: none"> • (FRNSW, 2019), to the satisfaction of FRNSW. 				
WASTE	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
<p>B35. The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (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 (in consultation with Council for use of Council facilities). 	<p>No Partial [CB1]</p>	<p>Finalise EMS when monitoring details are available</p>	<p>Include a commitment to address the requirements of this condition. Table 6.2 should be updated to include monitoring.</p>	<p>Commitment included.</p> <p>Waste Plan not yet available for monitoring details.</p> <p>Included commitments under Waste</p>

				<p>Management Plan. Implementation to be guided by CEMP. Reference in Appendix B and responsibility included.</p> <p>High level Waste Management Plan (WMP) monitoring and reporting factors now included in EMS, however WMP and/or must be referenced in full by contractor.</p>
ACCOMMODATION AND EMPLOYMENT STRATEGY	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

<p>B36. Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development. This strategy must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council and informed by consultation with local accommodation and employment service providers; (b) propose measures to ensure there is sufficient accommodation for the workforce associated with the development; (c) consider the cumulative impacts associated with other State significant development projects in the area; (d) investigate options for prioritising the employment of local workers and use of local businesses during construction and operation of the development, where feasible; (e) give consideration to strategies that leave a positive community legacy and maximise local economic contribution; and (f) 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 upgrading and decommissioning. <p>The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary a minimum of 6 months prior to commencement of construction and implement the plan throughout construction.</p>	<p>No Yes</p>	<p>Included in Section 6.</p>	<p>Include a commitment to address the requirements of this condition. Table 6.2 should be updated to include monitoring.</p>	<p>Commitment included. Monitoring included.</p>
<p>DECOMMISSIONING AND REHABILITATION</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>

<p>B37. Within 3 years of the commencement of operation, the Applicant must prepare a Decommissioning and Rehabilitation Plan for the development which shall be updated by the Applicant half-way through the operational life of the project, and within 2 years prior to decommissioning. The Plan must:</p> <p>(a) include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Error! Reference source not found. below; and</p> <p>(b) describe the measures that would be implemented to:</p> <p>(i) decommission the development and rehabilitate the site in accordance with the objectives in Error! Reference source not found.;</p> <p>(ii) minimise and manage the waste generated by the decommissioning of the development;</p> <p>(iii) include a program to monitor and report on the implementation of these measures against the detailed completion criteria; and</p> <p>(iv) ensure that best practice is employed in respect of utilising available recycling technologies.</p>	<p>No Yes</p>	<p>Included in Section 2.</p>	<p>Include this requirement in the description of the EMS and sub plans.</p>	<p>Included.</p>
<p>SCHEDULE 2 -PART C ENVIRONMENTAL MANAGEMENT Environmental Management Strategy</p>	<p>Sufficient (yes/no/partial)</p>	<p>Document reference and comment</p>	<p>Action required</p>	<p>Company response</p>
<p>C1. 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:</p> <p>(a) provide the strategic framework for environmental management of the development;</p>	<p>Partial Yes</p>	<p>Section 2 addresses this in general. Figure provided needs to be reworked.</p> <p>Section 2 amended.</p>	<p>Not all plans in Section 2 are required by the consent. Suggest identifying those required under the consent and those that have been included to ensure certain consent conditions such as noise are met. Figure 2.1 also needs to be reworked to reflect the system.</p>	<p>Plans which are not required by, but respond to, consent conditions.</p> <p>Figure 2.1 reworked as suggested.</p>

<p>(b) identify the statutory approvals that apply to the development;</p>	<p>Partial Yes</p>	<p>There are other relevant Acts, regulations and planning instruments that have not been mentioned such as Roads Act, Biodiversity Conservation Act, Heritage Act, etc Addressed in Section 3</p>	<p>Identify and discuss all relevant approvals, licenses, permits etc that are applicable.</p>	<p>Relevant approvals/licenses/permits have been listed or described in this section.</p>
<p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p>	<p>Partial Yes</p>	<p>Section 4 addresses this in general and Section 6.</p>	<p>Ensure that all environmental monitoring in Section 6 is described and assigned to a specific role. This also needs to match the responsibilities in Section 4. The compulsory environmental induction process needs to be described somewhere in the plan. It is critical this process addresses key requirements, responsibilities etc</p> <p>The EMS should be finalised once the sub plans are complete to ensure all relevant requirements are addressed.</p> <p>The EMS should be finalised once the sub plans are complete to ensure all relevant</p>	<p>Roles assigned and described.</p> <p>Not all environmental monitoring requirements per subplans is available yet. EMS to be updated. Induction process/contents is to be provided when Construction Contractor awarded. EMS updated if this is to be included, however draft indicative contents provided.</p> <p>Roles</p>

			requirements are addressed.	updated to be consistent with AES subplan. EMS is final and subplans will be referenced / implemented in detail under the CEMP.
<p>(d) describe the procedures that would be implemented to:</p> <p>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</p>	<p>Partial Yes</p>	<p>Discussed very generally in Section 5. Need to expand this section. Include details of communication methods including media releases for major milestones, letterbox drops to landholders, meetings, phone calls, flyers etc.</p> <p>Details added to Section 5</p>	<p>Provide more details for informing local community of the operation and environmental performance.</p>	<p>This section is reasonably clear – website updates, reporting and other methods described in the EMS will alert community to operations and performance. Reporting and monitoring will be made available. Milestone project events including operations and any changes will require</p>

				community notification.
(ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and respond to emergencies; and	Yes	Addressed in Section 5.		-
(e) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and	Partial Partial		Refer to comment regarding sub section (a) above regarding relationship between plans and the EMS should be finalised once the sub plans are complete to ensure all relevant requirements are addressed.	Updated. Subplans will be implemented in accordance with the CEMP. Details of this relationship provided in Appendix B, Section 6 and Section 1. Updated Appendix B

			<p>The EMS should be finalised once the sub plans are complete to ensure all relevant requirements are addressed.[CB2]</p>	<p>response to (e)(i) to confirm CEMP and subplans will contain detail, however summary provided in Table 6-3.</p>
<p>(v) 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.</p>	<p>Partial Partial</p>	<p>The description in Section 6 does not provide a clear plan. Details should also include frequency (daily, weekly, monthly etc) and key aspects to be monitored Including Aboriginal heritage (unexpected finds). Responsibility should be allocated to roles and ultimately the proponent is responsible.</p>	<p>Update Section 6 and complete Table 6-2. Both require more details and of all aspects to be monitored. The EMS should be finalised once the sub plans are complete to ensure all relevant requirements are addressed. The EMS should be finalised once the sub plans are complete to ensure all relevant requirements are addressed.</p>	<p>Updated however not all subplans are available. EMS to be updated when plans are available/ approved, and details can be included in CEMP for detail (contractor also needs to refer to full subplans regardless). Subplans will be implemented in accordance with the CEMP. As above, noting CEMP and subplans will be finalised and may be subject to review/approval prior to relevant stages commencing.</p>

				[CB3]	
Revision of Strategies, Plans and Programs		Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C2.	<p>The Applicant must:</p> <p>(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</p> <p>(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:</p> <p>(i) submission of an incident report under condition Error! Reference source not found. of SCHEDULE 2;</p> <p>(ii) submission of an audit report under condition Error! Reference source not found. of SCHEDULE 2;</p> <p>(iii) any modification to the conditions of this consent.</p>	Yes	Addressed in Section 9.		-
Updating and Staging of Strategies, Plans or Programs		Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C3.	<p>With the approval of the Planning Secretary, the development may be staged, and the Applicant may:</p> <p>(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</p> <p>(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</p> <p>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</p>	Partial Partial Partial	Section 1.2 indicates the project will be undertaken in stages, but limited information is provided.	<p>Provide details on staging and how the EMS and sub plans will be staged (especially TMP and consultation with TfNSW).</p> <p>The EMS should be updated when the staging plan is finalized and approved by Secretary.</p> <p>Minor change to the staging in Section 1.2. It should refer to Appendix 5 of the</p>	<p>Staging details TBC – EMS to be updated.</p> <p>Staging details updated in accordance with staging plan and TMP.</p> <p>Updated</p>

			consent which describes the road upgrades	
Updating and Staging of Strategies, Plans or Programs	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C3. If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Partial Partial Partial	Section 1.2 indicates the project will be undertaken in stages, but limited information is provided.	Provide more details on staging and how the EMS and sub plans will be staged. The EMS should be updated when the staging plan is finalized and approved by Secretary. The staging in Section 1.2 should refer to appendix 5 of the consent which describes the road upgrades	Staging details TBC – EMS to be updated. Staging details updated in accordance with staging plan and TMP. Updated
Request NOTIFICATIONS Notification of Department	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

C7.	<p>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.</p> <p>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.</p>	Yes	Addressed in Appendix B – additional compliance requirements.		-
Final Layout Plans		Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C8.	<p>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 including details on the siting of solar panels and ancillary infrastructure.</p> <p>The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.</p>	Yes	Addressed in Appendix B – additional compliance requirements.		-
Work as Executed Plans		Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C9	<p>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 to the Department via the Major Projects website.</p>	Yes	Addressed in Appendix B – additional compliance requirements.		-
Incident Notification		Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C10.	<p>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 8.</p>	Partial Yes	Addressed in Appendix B – additional compliance requirements.	Include reference to Appendix 8 of the conditions of consent.	Addressed – reference included.
Non-Compliance Notification		Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C11.	<p>The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance.</p>	Yes	Addressed in Section 6.3.2 and 6.3.4		-

C12. 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.	Yes	Addressed in Section 6.3.2 and 6.3.4		-
C13. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Yes	Addressed in Section 6.3.2 and 6.3.4		-
INDEPENDENT ENVIRONMENTAL AUDIT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C14. Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	Yes	Outlined in section 6.1.1 and Appendix B		-
INDEPENDENT ENVIRONMENTAL AUDIT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C17. In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition Error! Reference source not found. of SCHEDULE 2 of this consent, or condition Error! Reference source not found. of SCHEDULE 2 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.	Yes	Outlined in section 6.1.1 and Appendix B		-
INDEPENDENT ENVIRONMENTAL AUDIT	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response
C18. 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 <i>Independent Audit Post Approval Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	Yes	Outlined in section 6.1.1 and Appendix B		-
ACCESS TO INFORMATION	Sufficient (yes/no/partial)	Document reference and comment	Action required	Company response

<p>C20. The Applicant must:</p> <ul style="list-style-type: none"> (i) make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent (other than the Emergency Plan); (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vii) how complaints about the development can be made; (viii) a complaints register; (ix) compliance reports; (x) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (vi) any other matter required by the Planning Secretary; and (b) keep this information up to date 	<p>Yes</p>	<p>Addressed in Section 5.2.1</p>		<p>-</p>
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