

ABN 70 250 995 390
180 Thomas Street, Sydney
PO Box A1000 Sydney South
NSW 1235 Australia
T (02) 9284 3000
F (02) 9284 3456

Wednesday, 16 November 2022

The Planning Secretary
NSW Department of Planning Industry and Environment
12 Darcy Street
Parramatta NSW 2150
Locked Bag 5022
Parramatta NSW 2124

CC: Katrina O'Reilly

Dear Mr Cassel

Re: EnergyConnect (NSW – Western Section) (SSI-10040) – Transgrid response to the Department's request for information regarding Independent Environment Audit #1

I refer to EnergyConnect (NSW – Western Section) (SSI-10040) (the Project), which the NSW Minister for Planning and Public Spaces approved on 28 September 2021 under section 5.19 of the NSW *Environmental Planning and Assessment Act 1979*, the Independent Environmental Audit reported lodged with the Department on 17 October 2022 and the Department's subsequent request dated 20 October 2022.

Please find attached (as **Attachment A**) a response from Transgrid's construction contractor, SecureEnergy Joint Venture (SecureEnergy), to each of the auditor's recommendations. Noting that the recommendations do not relate to any non-compliances, Transgrid is generally satisfied with SecureEnergy's responses. Transgrid's response to each audit recommendation is provided below.

Recommendation 1 – Enhanced use of technological applications

Transgrid notes that the audit recommendation is quite general. Transgrid works with SecureEnergy personnel concerning environmental performance and compliance and is generally comfortable that the technological applications currently in use, which include GPS-accessed constraints mapping and tracking, are appropriate. The audit considered site works occurring at the time, which were occurring at camp, compound and substation sites only. The technological applications in use have limited benefits for those fixed sites due to the fixed site boundaries and full disturbance required within. Transgrid expects that the next audit will consider the technological application in use for clearing and construction along the transmission alignment, which has since commenced, where the technological applications are of more use.

Recommendation 2 – Critical information in more user-friendly documents

During site inspections, Transgrid personnel participate in pre-starts and the other training and communication systems SecureEnergy uses to communicate relevant information to ensure that construction personnel are aware of location and activity-specific environmental constraints and requirements relevant to active construction sites and activities. Transgrid is generally comfortable with the systems the contractor is implementing and works with the contractor to refine the systems as required. Many of these systems are more relevant to works along the transmission alignment, which were yet to commence at the time of the audit. Transgrid expects that the ongoing audits will consider and comment on the adequacy of the systems in place.

Recommendation 3 – Environmental and cultural heritage risk awareness programs

Given the biodiversity and cultural heritage values and sensitivities across the project site, the Project takes compliance with all associated commitments and requirements very seriously. SecureEnergy has developed and implemented systems to ensure appropriate risk awareness, and Transgrid is generally comfortable with the implemented approaches. The absence of incidents concerning biodiversity and heritage indicates that the current systems are adequate. Again, Transgrid expects that the ongoing audits will consider and comment on the adequacy of the existing systems.

Recommendation 4 – ISO 14001 and management review

Transgrid notes that while the Construction Environmental Management Plan (CEMP) is generally aligned with the principles of ISO 14001, the conditions of approval do not directly require conformance to the standard. Regardless, SecureEnergy has committed to including a management review process in the next revision of the CEMP.

Recommendation 5 – Concurrent review of site layouts, vehicle movement and erosion and sediment control plans

Transgrid notes SecureEnergy has been reviewing and updating erosion and sediment control plans and associated site layouts and protocols progressively as the sites develop and weather/ground conditions change, as per commitments in the CEMP and Soil and Water CEMP Sub-plan and the audit recommendation. Transgrid reviews progress during regular site inspections. Transgrid expects that ongoing audits will review and comment on how all site-based plans and protocols are working together within the project sites.

Recommendation 6 – Include map in Driver's Code of Conduct

SecureEnergy has committed (refer to Attachment A) to include a map in the Driver's Code of Conduct in the next revision of the Traffic and Transport CEMP Sub-plan, anticipated at the end of January 2023.

Recommendation 7 – Biodiversity accounting and reporting processes

SecureEnergy points out (refer to Attachment A) the protocols in place for vegetation clearing, noting the clearing limits. Transgrid notes that transmission line clearing was yet to commence at the time of the audit. Transmission line clearing has now commenced, and the clearing and reporting processes approved via the Biodiversity CEMP Sub-plan are being implemented. Transgrid expects the ongoing audits will consider and comment on the adequacy of the approved clearing protocols that are actively in use along the alignment.

Transgrid notes that the auditor has updated the Audit Report (see **Attachment B**), as requested by the Department, to include:

- consultation documentation (refer to Appendix D in revised Audit Report); and
- an assessment of the compliance between actual and predicted impacts documented in the environmental impact assessment (refer to (new) Section 3.7 in the revised Audit Report).

Please note that Appendix D in the revised Audit Report now contains potentially sensitive information (names, emails address, phone numbers etc) that might need to be redacted if the Audit Report is to be made available publicly.

I trust that this response satisfies the Department's request. If you wish to discuss any aspect of this response, please do not hesitate to contact the Project's Environmental Manager, John Fisher (John.Fisher@transgrid.com.au or 0448 514 073).

Yours Sincerely



Stephen Troughton

Project Director – Project EnergyConnect

Steohen.Troughton@transgrid.com.au

0409 080 031

Attachments:

- Attachment A – SecureEnergy responses to audit recommendations
- Attachment B – Updated Audit Report (dated 2 November 2022)

Attachment A - Response to recommendations of the Independent Environmental Audit Report

Ref	Condition(s)	Key Issues	Observations	Recommendation	Project response	Timeframe for implementation
1	B1	CEMP	The project is significant in terms of both size and complexity with substantial commitments, stakeholder engagement, monitoring and reporting requirements. Ensuring the correct balance between field supervision with office-based administration, stakeholder and reporting will be a challenge as an imbalance may result in increased risk of incident in the field. There may also be instances where resource gaps within the team may need to be filled during roster periods.	An opportunity to improve process efficiency through enhanced use of technological applications, simplifying routine processes and administrative tasks (on a risk-based approach) may optimise the field time of the site-based environment team to ensure on the ground risks are minimised. It is recommended that this opportunity is explored. It is also recommended that contingency resourcing plans for the environment team should be developed to account for the roster system.	The Project already utilises technological applications that simplifies routine process and administrative tasks. Current Project resourcing, including contingency resourcing, already addresses this recommendation.	Considered to be addressed.
2	B1	CEMP	The Construction Environmental Management Plan (CEMP) and specialist management plans are technically rigorous and complex. This may lead to misinterpretation or misunderstanding of the requirements in the field resulting in an increased risk of incident or non-conformance.	There may be benefit in reviewing the plans and presenting the critical information with simpler and more user-friendly documents by optimising the use of visual presentations, flowcharts, tables, and technology applications such as GIS. This may be particularly useful for high risk and routine processes such as ground disturbance and clearing. It may be beneficial to re-engage with relevant stakeholders including	The Project utilises various methods to communicate the requirements of the CEMP and CEMP Subplans. These include inductions (visual presentation), toolbox talks, a GIS database and environmental training. Documents such as site-specific environmental work method statements or EMPs are also prepared to more clearly communicate the specific requirements of a particular work activity.	Considered to be addressed.

Ref	Condition(s)	Key Issues	Observations	Recommendation	Project response	Timeframe for implementation
				aboriginal, technical specialists (soil and water, heritage, ecology, so that the requirements are clearly understood, and process improvements may be identified).		
3	B1	CEMP	There are a range of mechanisms within the CEMP to communicate CEMP requirements, provide training, education and promote cultural awareness. These include daily pre-start talks, leadership visits and targeted environmental briefings. An opportunity exists to capitalise on current platforms to deliver clear messaging to the workforce of the importance of environmental and aboriginal cultural heritage values.	It is recommended that an environmental and aboriginal cultural heritage risk and awareness program that is aimed at the project workforce is developed and implemented focusing on the priority risks and important cultural heritage values. The program may utilise the existing platforms such as pre-starts and leadership visits but may also include additional tools such as field pocket handbooks and posters. The opportunity to involve aboriginal stakeholder groups and the project leadership in the program is encouraged.	The Project already has environmental and aboriginal cultural heritage risk and awareness programs that address this recommendation.	Considered to be addressed.
4	B1	CEMP	The International Standard for Environmental Management (ISO 14001) documents a process for undertaking management reviews involving top management to ensure the continuing suitability, adequacy and effectiveness of the Environmental Management System. SEJV have a range of	It is recommended a formalised process for undertaking management reviews involving the top project management team is documented in the CEMP (noting that this may be the formalisation of existing processes). It is recommended that the	When the Stage 2 CEMP is next revised it will be updated to include a management review process. This process exists within the Clough management system (which is applied on the Project) irrespective of inclusion in the CEMP.	When the CEMP is next revised.

Ref	Condition(s)	Key Issues	Observations	Recommendation	Project response	Timeframe for implementation
			reporting mechanisms and management tools to ensure top management are involved with the implementation of the CEMP and related management plans, however the format and frequency of undertaking management reviews is not defined within in the CEMP.	reviews include an assessment of key performance metrics such as biodiversity clearing limits, indigenous employment, and local industry participation targets etc.		
5	D14, D16	Dust, Erosion and Sediment Control	Camp 6 is in the early phases of construction, the primary method of controlling dust is with a water cart and a street sweeper with a broom attachment which may be less effective during hot, dry and dusty conditions. There is also the potential for tracking dirt on the road as construction activities accelerate.	It is recommended that the site layout, vehicle movement plan and erosion and sediment control plan are reviewed concurrently with the objective of providing primary dust and sediment control. This will provide the opportunity to test systems prior to the establishment of other site compounds, accommodation camps and laydown areas.	The process for review of the site layout, vehicle movement and erosion and sediment control plans has been refined over the previous months of operation and there is synergy between all Plans in use. For example, changes to the vehicle movement plan have resulted in improvements to primary sediment control. Significant progress has been made in controlling dust on site since the time of the audit.	Considered to be addressed.
6	D36, D36	Vehicle Routes	Driver's code of conduct does not include a map or clear instruction of the approved vehicle routes. There is no visible signage on key access routes alerting drivers to correct (or incorrect) vehicle routes.	It is recommended that the driver code of conduct is updated to include a map showing the approved vehicle routes (as per Appendix 2 of the infrastructure approval). It is also recommended that the current measures to communicate and monitor the approved routes to contractors, suppliers and personnel are reviewed and appropriate mechanisms are	The Stage 2 TTMP will be reviewed and revised to include a map in the Driver's Code of Conduct. The measures within the TTMP have been reviewed. In addition to the Drivers Code of Conduct, the approved access routes are communicated during toolboxes and pre-start meetings.	TTMP revision – end of January 2023. Considered to be addressed.

Ref	Condition(s)	Key Issues	Observations	Recommendation	Project response	Timeframe for implementation
				implemented that may include visible signage at key intersections and/or on approved routes. Another alternative for consideration may be the use of vehicle tracking technology.	Tracking technology is in place for many of the project vehicles through the IVMS (In-vehicle monitoring system).	
7	D25	Restrictions on Habitat Removal	The project is in its early stages of construction with minimal clearing undertaken to date. The project has an established pre-clearing process which is overseen by the project ecologist with cleared areas recorded and reported. While the current process is adequate for the limited clearing to date, there does not appear to be a documented process for auditing the clearing limits and for providing up to date information regarding progress and compliance with clearing restrictions.	It is recommended that biodiversity accounting and reporting processes are reviewed, and a clear process is defined and implemented so up to date information is available so compliance with clearing restrictions may be monitored and reported accurately.	The Project is already utilising a Clearing and Land Disturbance permitting system which includes the use of a Clearing and Land Disturbance Register. Vegetation quantities approved for clearing are included on the issued Permit and tracked in the Register to ensure compliance with the allowable clearing limits. Clearing volumes are regularly forecasted utilising the Project's GIS database based on in-field clearing practices and monitored against the allowed clearing limits.	Considered to be addressed.

Attachment B – Updated Audit Report (dated 2 November 2022)

Note: Report will be uploaded to the Planning Portal as a separate file with this correspondence.