

Reference	Condition Number	Details of Non-Compliance	Project Response
A3 – NC1	E6	<p>The fire incident on the 28th of February 2023, was reported to DPE on the 1st of March 2023, six days after the incident.</p> <p>This does not satisfy the requirement for immediate notification.</p>	<p>DPE were notified immediately after the Project become aware that a notifiable incident had occurred.</p> <p>The incident was originally deemed to not meet the definition of an incident under the Approval. By definition in the approval instrument, an incident must cause or threaten to cause 'material harm'. It is therefore important to understand if 'material harm', as defined in the approval instrument, occurred or was threatened, which requires details of the event. In remote locations such as the project site, obtaining the requisite information can take time.</p> <p>During the detailed investigations it was identified that the water truck was immobilised resulting in actual risks to the health and safety of project personnel. At this point, the event was determined to be notifiable under the Approval. The correspondence issued to DPE notifying them of the event advised the Department of the above.</p> <p>Additionally, whilst DPE issued a penalty notice in relation to the non-compliance, at no stage did they indicate concerns within the reporting timeframes and compliance with E6. Reporting timeframes in this instance had no bearing on the severity of the incident itself or on implementation of the corrective and preventative actions.</p> <p>Based on the above, the Project does not agree with the findings of the audit that a non-compliance has occurred in relation to Condition E6.</p>
A3 – NC2	D47	<p>As noted in Section 3.2 below, DPE has issued a Penalty Notice in relation to the fire incident on the 23rd of February.</p>	<p>No additional response.</p>

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		The Penalty Notice notes non-compliance with Condition D47 of the Infrastructure Approval.		
Reference	Observation	Recommendation	SE Response	Timeframe for implementation
A3- R1	D46/D47 Conditions D46 and D52 require the provision of a 20,000-litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps.	Water supply tanks have been installed at the Camp 6 and 7 sites as required by this condition. It was not clear to the auditor that the tank at Camp 7 was the water supply tank as required by this condition. Therefore, it is recommended that appropriate signage is installed to ensure emergency services can quickly identify the water supply tank in the event of an emergency. As per the previous audit, it is recommended the RFS are notified of the location of and access to the fire tank. Commission testing of the FRNSW suction connection with RFS equipment should also be undertaken to ensure effectiveness in a fire emergency (as recommended by the previous audit).	Signage has been ordered and will be placed on fire water supply tanks. RFS have been provided with both the Emergency Plan and the Project's Emergency Response and Preparedness Plan. Where the location of the tank has been altered compared with what was communicated in the Plan(s), an updated site layout plan will be provided. Commission testing is not a requirement of either of the above Plans, however, the Project will endeavour to have the RFS visit Camp sites to inspect the location and installation of the fire water supply tanks.	Signage has been ordered and will be installed when received (nominally, within 1 month). Site visits will occur at the discretion of the RFS.
A3- R2	B5 The recommended action from the previous audit (refer to A2-R3) has not been completed by the documented due date. The record of the quarterly	Review the current processes, content, and focus for: <ul style="list-style-type: none"> • Internal auditing • Quarterly HSSE meetings. 	The Quarterly HSSE forum did include discussion on recent audit findings and compliance with Conditions of Approval. The forum is not formal in nature and not all discussions are documented. The forums are not a requirement of the Projects	Ongoing.

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	<p>SHEQ (April 2023), or the internal audit undertaken on the 17th-19th of April does not include any commentary or status update regarding:</p> <ul style="list-style-type: none"> • results and actions of previous audits • compliance with conditions of approval 		<p>management system, consideration of the recommendation will be given to future forums.</p> <p>Internal audit requirements are set by Transgrid and are currently being reviewed.</p>	
A3- A3	<p>D47</p> <p>Noting the non-compliance with conditions of approval relating to the Emergency Plan, the fire that occurred in February 2023 and the impending bushfire season, a need to ensure the project is fully equipped to prevent and respond to any fire related incidents.</p>	<p>Conduct a pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. It is recommended the review should focus on the activities noted in the Bushfire Management including:</p> <ul style="list-style-type: none"> • 7.3 Onsite Preparedness Activities • 7.4 Firefighting water supplies and equipment • 7.5 Access and egress for emergency vehicles • 8 Emergency Response • 9 Communication Protocols <p>Involve suitably qualified personnel in the review as required. A record of the review should be kept.</p>	<p>A bushfire readiness review is currently underway in relation to the content and implementation of the Emergency Plan. Additionally, toolbox talks will be delivered to all site personnel.</p>	31/10/2023
A3- A4	<p>D41</p> <p>Traffic management signage has been installed at all key sites observed including Camp</p>	<p>Review the configuration of the signage at the Camp 7 location and make any changes as appropriate</p>	<p>Traffic management signage at Camp 7 was reviewed and rectified within two days of the Audit site visit.</p>	Already addressed.

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	6, Camp 7 and the Water Bore location, the auditor observed the configuration of the signage at the Camp 6 location			
A3- A5	D6 The fire incident was not reported to DPE within the timeframes required by Condition D6	Provide refresher training for relevant personnel regarding the identification and reporting of incidents.	As per the response to non-compliance A3 – NC1, the Project believes that the reporting and notification requirements were adhered to and as such, no further action is required.	