

BARNETT & MAY

EnergyConnect PEC West Project SSI 10040

February 2024 Construction Phase Independent
Environmental Audit

Prepared for
Secure Energy

Client representative
Rebecca Walker-Edwards

Date: 17 April 2024
Rev 0



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Prepared by — K. Holmes		Date 17 April 2024
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Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
A	Draft for client Review	K Holmes	M Holmes	K Holmes	11/4/2024
0	Final Report	K Holmes	K Holmes	K Holmes	17/4/2024

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1. Introduction

Barnett & May was engaged by Green Light Contractors PTY LTD, trading as Secure Energy (ABN 56 282 382 697) to conduct the third construction phase Independent Environmental Audit (IEA) of the Secure Energy PEC West Project.

The project consists of the construction of a 330kV from SA border to Buronga substation, then 220kV from Buronga sub to Red Cliff substation in Victoria. Transgrid is the Proponent, SecureEnergy is the Construction Contractor.

The Project is being delivered in 2 stages. Stage 1 is for early works and includes the upgrade of the existing substation at Buronga, establishing the Buronga accommodation camp, construction compound, and using and accessing a water supply point. Stage 2 involves the construction of the electricity transmission lines and associated access infrastructure.

The Infrastructure Approval (SSI 10040) covers both the construction and operational phases of the Project. Condition E11 requires that “*Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary*” .

The audit was undertaken in accordance with the Barnett and May’s proposal dated 27 September 2023, and the requirements of the NSW of Planning and Environment (DPE) Independent Audit Post Approval Guidelines (May 2020). The Audit was commissioned 14 November 2023. DPE approved the appointment of the Auditor on 5 December 2023.

The audit was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May and commenced with the site inspection on 19 and 20 February 2024.

1.1 Project Description and Status of Construction

The EnergyConnect Project is being delivered by Secure Energy on behalf of Transgrid and consists of the construction and operation of a new electrical interconnector and network support option between NSW and SA, with an additional connection to Red Cliffs in north-west Victoria.

The interconnector is aimed at reducing the cost of providing secure and reliable electricity transmission between NSW and SA in the near term, while facilitating the transition of the energy sector across the National Electricity Market to low emission energy sources.

EnergyConnect involves constructing a new high voltage electricity interconnector, approximately 900km long, between the power grids of SA (starting at Robertstown) and NSW (finishing in Wagga Wagga). EnergyConnect comprises following sections:

- Victorian section, which extends from the NSW/Victoria border to an existing electricity facility at Red Cliffs
- NSW sections including:
- Western section (the subject area of this audit) which extends from: the SA/NSW border (near Chowilla in SA) to Buronga
- Buronga to the NSW/Victoria border at Monak (near Red Cliffs in Victoria)
- Eastern section, which extends from Buronga to Wagga Wagga
- SA section, which extends from Robertstown to the SA/NSW border.

TransGrid has two separate environmental planning approval applications for the sections within NSW these are for the:

- NSW – Western Section (Application Number SSI 10040)
- NSW – Eastern Section (Application Number SSI 9172452).

This Independent Environmental Audit covers the works on the western section under SSI 10040.

The Project is being delivered in 2 stages. Stage 1 covered the early works that included the upgrade of the existing substation at Buronga, establishing the Buronga accommodation camp, construction compound, and using and accessing a water supply point. These works are complete.

The current Stage 2 works involve the construction of the electricity transmission lines and associated access infrastructure, including:

- Finalisation of any outstanding Stage 1 construction activities
- Establishment and operation of Wentworth accommodation camp, compound and Anabran South ancillary site
- Buronga substation upgrade and expansion
- Establishment other ancillary facilities on the transmission line construction corridor outside identified heritage risk zones
- Property adjustment work including adjustments to property fencing
- Access points, water supply points establishment and/or use
- Construction access tracks
- Transmission line construction
- Utility adjustments and protection
- Progressive site rehabilitation and landscaping.

1.2 Audit Objectives

The objectives of this Independent Environmental Audit, in accordance with the Post Approval Audit Guidelines, were to:

1. Assess compliance against the conditions required of the Project Approval.
2. Review all relevant post approval documentation by the Project Approval(s) including an assessment of the implementation of Environmental Management Plans and Sub-plans.
3. Review compliance against other environmental licences and approvals excluding any Environmental Protection Licence issued under the Protection of the Environment Operations Act 1997.
4. Review the environmental performance of the development including:
 - a. A high-level comparison of actual impacts against predicted impacts as documented in the environmental impact assessment.
 - b. The physical extent of the development in comparison with the approved project boundaries.
 - c. Review of environmental incidents, non-compliances, and complaints relevant to the audit period.
 - d. Performance against any applicable environmental policy or environmental issue identified through consultation with the relevant Regulatory Authorities.
 - e. Feedback received from DPE, other Agencies or Stakeholders including the community Consultative Committee (or equivalent body if applicable) relating to environmental performance of the development.
5. Review of the status of non-compliances and recommendations made in the preceding Independent Environmental Audit.
6. A high-level assessment of the adequacy of the Environmental Management Plans and Sub-plans required by the Approval.
7. Review performance of the development against any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

1.3 Audit Scope

The audit provides an assessment of the compliance of the project with the conditions of Project Approval SSI 10040. Note that no other relevant environmental licences or approvals were identified for this development.

The scope of this audit was developed to meet the requirements of the NSW DPE Independent Audit Post Approval Guidelines May 2020 (as specified in the Approval). The audit scope was therefore developed with consideration of:

- Requirements of the Project Approval(s);
- Relevant correspondence from DPE (provided by the Auditee);
- Inputs provided by the Stakeholders consulted as part of this IEA;
- Review of the findings of the previous IEA; and
- The Auditor's experience in relation to relevant industry practices.

1.4 Audit Period

This audit of the construction phase of the project covers the period of 27 July to 2023 to 18 February 2024.

1.5 Limitations of this Report

In preparing this Independent Environmental Audit Report, Barnett and May has assessed the activities appropriate and necessary to evaluate the compliance status against the conditions contained in the Auditee's Project Approval. Barnett and May has addressed the general technical matters which might reasonably be considered to be relevant to such an assessment.

The findings of this Independent Environmental Audit are based on observations of the site, interviews with personnel nominated by the Auditee and review of the documentation provided by the Auditee. Barnett and May has relied on the accuracy and completeness of the documentation and other information provided by the Auditee.

Barnett and May can only advise based on the information provided to them and therefore cannot dismiss the possibility that compliance or environmental performance issues, other than those presented in the report existed at the time of this Audit.

The audit findings presented in this report are professional opinions based solely upon Barnett and May's visual observations of the site, and upon Barnett and May's interpretation of the documentation reviewed, interviews and conversations with personnel nominated by the Auditee, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated. Opinions presented in this report apply to the site's conditions and features as they existed at the time of the audit, and those reasonably foreseeable. They necessarily cannot apply to conditions and features which Barnett and May is unaware of and has not had the opportunity to evaluate. This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation.

2. Definitions

Acronyms	Description
AQMP	Air Quality Management Plan
ASS	Acid Sulphate Soils
BCA	Australian Building Codes
BCS	Biodiversity, Conservation and Science Directorate (DPE)
BMP	Biodiversity Management Plan
CCS	Community Consultation Strategy
CEMS	Construction Environmental Management Strategy
CAQMP	Construction Air Quality Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CWMP	Construction Waste Management Plan
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DECC	Department of Environment and Climate Change (now DPHI)
DPE	Department of Planning and Environment (Now known as DPHI)
DPHI	Department of Planning, Housing and Infrastructure (formerly the Department of Planning and Environment / Department of Planning, Infrastructure and Environment)
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A	Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
ER	Environmental Representative
ESD	Ecological Sustainable Development
HMP	Heritage Management Plan
IEA	Independent Environmental Audit
ICNG	EPA Interim Construction Noise Guideline
NVMP	Noise and Vibration Management Plan
OEH	NSW Office of Environment and Heritage
PEC	Project EnergyConnect
SSI	State Significant Infrastructure
TfNSW	Transport for New South Wales

3. Auditor Certification

Independent Audit Certification Form	
Development Name	EnergyConnect Project (NSW Western Section)
Application Number	SSI 10040
Description of Development	High Voltage Electricity Transmission Line
Development Address	Southwestern NSW
Proponent	Transgrid
Title of Audit	EnergyConnect PEC West March 2024 Independent Environmental Audit
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (May 2020).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p><i>Note.</i></p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	49 Coba Point, Berowra Waters, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	17 April 2024

3.1 Audit Details

Table 1 - Audit Details

Audit Title:	EnergyConnect (NSW – West Section) February 2024 Construction Phase Independent Environmental Audit
Site:	EnergyConnect (NSW – West Section)
Client Contact:	Rebecca Walker-Edwards
Position:	Approvals Manager
Client:	Transgrid
Client Address:	Level 19, 83 Clarence St Sydney NSW 2000
Client Phone Number:	+61 420974540
Client Email:	Rebecca.walker-edwards@elecnor.es
Auditor:	Ken Holmes (Certified Lead Auditor)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Audit Commencement:	19 February 2024

4. Audit process

4.1 Audit Guidelines

This audit report has been prepared in accordance with the 'Independent Audit Guideline, May 2020 as required by the project approval and specifically with the audit frequency specified in that edition of the audit guidelines. For consistency with current audit scopes, this audit also satisfies the general scope specified in the current edition of the DPE Independent Audit Guidelines and the and requirements of the Independent Audit Guidelines May 2020 (DP&E, May 2020)

Table 2 lists key requirements from the Audit Guidelines, the relevant Section of the Guidelines which references the requirement and indicates where each is addressed in this report.

Table 2 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	Version Control <ol style="list-style-type: none"> 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report. 	Section 3 Page iii Page iii Section 3.1
4.2	Contents	
4.2.1	Introduction – a brief overview of the audit including: <ol style="list-style-type: none"> 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit. 	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	Audit Methodology <ol style="list-style-type: none"> 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document. 	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	Audit Findings <ol style="list-style-type: none"> 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements; 3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period; 	Appendix A Section 6.1 Section 7.3

Section	Independent Audit Report Requirements	Addressed
	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4
4.2.4	Recommendations and opportunities for Improvement	Section 6.3
4.2.5	Appendices	
	1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	
	4) completed and signed Independent Audit Declaration Form(s);	
	5) any reports prepared by the agreed technical specialist(s), as required; and	
	6) site inspection photographs.	Appendix B

4.2 Overview

The audit process and methodology are summarised in this section, and comprised the following key undertakings:

- Preliminary planning activities;
- Review of information and preparation of a compliance register (audit protocol / checklist);
- Site inspection and interviews;
- Opening meeting;
- Review of relevant records;
- Review of additional information provided after the site inspection; and
- Preparation of this audit report.

4.3 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation;
- Update the audit compliance checklist;
- Completion of a project specific Risk Assessment;
- Review of online information;
- Submission of a preliminary document / record request; and
- Consultation with relevant agencies.

4.3.1 Approval of audit teams

Transgrid sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Auditor (Ken Holmes) on 5 December 2023 (Appendix C).

4.3.2 Consultation with Agencies

The Auditor consulted with a wide range of agencies and the Registered Aboriginal Parties (RAPs). Emails were initially sent to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Details of the responses from each group / organisation are provided in Section 5 with the Auditor's findings in relation to the issues raised in Section 7.9.

4.4 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in Appendix A of this report.

4.5 Site audit

The site inspection component of the audit was undertaken on 19-20 February 2024.

4.5.1 Opening Meeting

The opening meeting was held and attended by the following personnel:

- Catherine Curlewis – Environmental Manager
- Rebecca Walker-Edwards – Approvals Manager
- Nathan Macadam – Environmental Advisor
- Sarah Klocke – Environmental Advisor
- Luke Fania - Transgrid
- Ken Holmes (Lead Auditor)

Introductions were made, and the purpose and scope of the audit was outlined. An explanatory presentation was given to summarise the overall audit process. That is, a site inspection, site interviews and detailed review of records to identify compliance with the approval conditions relevant to the current operations at the site.

4.5.2 Site Inspections

The site inspection included observation of:

- Site access and security;
- Typical areas of the transmission line easement cleared of vegetation;
- Tower construction sites on the easement;
- Creek crossings;
- Soil and mulch stockpile areas;
- Surface water management infrastructure;
- Erosion and sediment controls;
- Accommodation Camps;
- Office and parking facilities;
- On-site maintenance facilities;
- Hazardous Materials Storage;
- Waste storage facilities; and
- Equipment Laydown areas.

4.5.3 Site Interviews

Audit interviews comprised of a series of meetings with:

- Rebecca Walker-Edwards – Approvals Manager
- Nathan Macadam – Environmental Advisor
- Sarah Klocke – Environmental Advisor

4.5.4 Closing Meeting

The closing meeting was held at the completion of the site inspection and attended by the following personnel:

- Rebecca Walker-Edwards – Approvals Manager
- Sarah Klocke – Environmental Advisor
- Luke Fania - Transgrid
- Ken Holmes (Lead Auditor)

Preliminary audit findings were presented and tasks and timeline for completion of the audit agreed.

4.5.5 Document Review

Compliance related documents that were not available prior to were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the Compliance Registers against specific conditions.

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 6. The audit criteria used to determine compliance for this audit is defined in Table 3.

Table 3 - Compliance Assessment Matrix

Assessment	Criteria
<p style="text-align: center;">Complies</p>	<p>Compliance</p> <p>The site complies with the requirements of applicable pre-operational Consent Conditions.</p> <p>A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.</p>
<p style="text-align: center;">Non-Compliance</p>	<p>Non-Compliance</p> <p>Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit.</p> <p>Site displays little or no evidence of compliance with the requirements of the regulatory documentation.</p> <p>Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.</p>
<p style="text-align: center;">Not Triggered</p>	<p>Not Applicable / Not Triggered</p> <p>The respective condition / requirement was not activated within the scope of the audit.</p>
<p style="text-align: center;">Noted</p>	<p>A statement or fact, where no assessment of compliance is required.</p>

Risk levels for each non-compliance identified have been assessed in accordance with Table 4.

Table 4 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: <ul style="list-style-type: none"> • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: <ul style="list-style-type: none"> • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

5. Stakeholder Consultation

Table 5 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 5 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Comments
<p>NSW Department of Planning, Housing, and Infrastructure</p>	<p>Katrina O'Reilly</p>	<p>NSW Planning would like the below areas to be focused on:</p> <ul style="list-style-type: none"> • Implementation of commitments in all management plans. • Erosion and sediment control measures and management. • Tracking of areas disturbed/cleared vs approved. • Adequate approvals for access roads/interfaces with the roads authority. • OOHW management and communication with neighbours. • Aboriginal and European site/s management and protection. • Threatened species management and protection. • Fire and emergency controls, management and prevention. • Complaints register management and actions. • Assessment of actual impact vs EA predictions. 	<p>All areas specified by DPHI have been reviewed during this audit:</p> <ol style="list-style-type: none"> 1. All management plans were reviewed (refer to Appendix A). The commitments in the plans were generally being implemented. 2. Erosion and sediment controls observed were of a high standard and installed in accordance with the relevant plans. 3. During the site inspection, access tracks and cleared works areas were inspected. No obvious tracking or clearing outside of approved areas was observed. For further information please refer to the Auditors response to BCD's comments below. 4. The required road access approvals were in place. 5. One instance of out of hours works was undertaken during this audit period. No complaints were received, however a recommendation for improvement has been made (refer to Table 7 below). 6. Aboriginal Heritage issues were being managed in accordance with the Aboriginal Management Plan requirements. 7. Threatened species management, please refer to point 3 above. 8. Fire and emergency controls - no emergencies or fires were recorded for this audit period. All required controls were in place, however fire water tanks at the accommodation camps were not appropriately signposted and the Emergency Plan lacks appropriate plans for each accommodation camp. 9. Two complaints were received during this audit period. Those complaints were managed in accordance with the EMS procedures. 10. The assessment of actual vs predicted impacts is presented in Section 7.9 below.

Department	Contact	Stakeholder Comments	Auditor Comments
Heritage NSW	Nicole Davis	<p>Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above State Significant Infrastructure. Thank you for the continued opportunity to comment on the project.</p> <p>In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the requirements under AH3, AH4, AH5, AH6 and AH7 in the Heritage Management Plan Energy Connect (NSW – Western Section) prepared by Secure Energy. These requirements detail the need for further survey, test excavation, assessment, salvage, and exclusion zones prior to construction.</p> <p>It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any noncompliance with Conditions of Consent for the project.</p>	<p>The implementation of the Heritage Management Plan has been assessed during this Audit. The Auditor inspected typical construction works along the alignment, including those adjacent to no-go areas. Photograph 6 (Appendix 2) shows exclusion fencing (green flagging) identifying a no-go area (PAD site), adjacent to the Buronga Substation construction site. Exclusion zones were delineated in those areas. Note that a recommendation for improvement has been made regarding monitoring and maintenance of exclusion zone fencing.</p> <p>A review of the heritage related records indicated that where required, further survey, test excavation, assessment, salvage had been undertaken.</p>
Southwest Biodiversity and Conservation Division	Simon Maffei	<p>BCD had requested that the previous audit (completed in August 2023) confirm that the clearing register includes all areas cleared and impacted, including any clearing, and mulching that occurs beyond the GPS tracked machinery. While the response from that audit was that “The clearing register is comprehensive and includes all the relevant information so that compliance with D25 and the commitments made in the EIS and subsequent BDAR addendum reports can be reported on”, it is not evident whether the spatial data being used to inform the clearing register was compared against the on ground clearing activities, particularly in the partial disturbance areas.</p>	<p>The clearing register has been established and the data specified in Condition D25 has been recorded in the clearing register (the register was provided to the Auditor).</p> <p>Elecnor stated that “<i>for as built clearing, our clearing subcontractor provides a spatial dataset which is uploaded to our GIS</i>”. The Auditor understands that the spatial data provided by the clearing subcontractor forms the basis for reporting, and that there is no verification of the accuracy / completeness of that data by, for example by the consultant ecologists who are present on site during clearing or by Elecnor personnel. The Auditor acknowledges that the Conditions of Approval do not require verification of the clearing data.</p> <p>Given the concerns raised by BCD in relation to the accuracy of clearing data, that following the completion of clearing that an audit (ground truthing) of the extent of clearing be undertaken.</p>

Department	Contact	Stakeholder Comments	Auditor Comments
DCCEEW Water Group	Tim Baker	<p>The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:</p> <ul style="list-style-type: none"> • The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: <ul style="list-style-type: none"> ○ Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan ○ Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan. ○ The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting. ○ Water supply availability is clearly defined for the project. ○ Water take at the site via storage, diversion, interception, or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018. ○ Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. ○ Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. • Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated. 	<p>A Soil and Water Management Plan has been prepared. The implementation of that plan was assessed during this audit. No non-compliances relating to water management were identified during the audit and there was sufficient evidence that the Soil and Water Management Plan was being implemented, both at the accommodation camps and at the tower construction sites inspected.</p> <p>No water access licences are required for this project. Rainwater (sediment laden) runoff is collected in on-site retention basins and used for dust suppression, all other water required is sourced from municipal supplies or from licenced bores (owned by others).</p> <p>The Planning Approval does not require annual reporting.</p>

Department	Contact	Stakeholder Comments	Auditor Comments
Crown Lands	Jarrold Smith	The Department has no specific concerns regarding the Project Energy Connect works on Crown Land but look forward to the reviewing the results of the audit.	Noted
Transport for NSW	Kelly-Anne Pont	TfNSW acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
NSW Environment Protection Authority	Briohny Seaman	The EPA acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
Wentworth Council	Jarrold Roberts	Council did not respond to the consultation request.	Noted
Department of Climate Change, Energy, the Environment and Water	Sahiba Zafrin	The Department did not respond to the consultation request.	Noted
Dareton Local Aboriginal Land Council	Pam Handy	DLALC did not respond to the consultation request	Noted
BMEC	Roland Smith	BMEC did not respond to the consultation request	Noted
Barkindji Maraura Elders Environment Team Limited	Arthur Kirby	BMEET did not respond to the consultation request	Noted

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent have been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. The Compliance Register presented in Appendix A provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 6 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 6 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non- Compliant	Noted	Not Triggered
Project Approval 22338205	167	119	3	10	35

6.2 Non-Compliances and other recommendations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix A** and are summarised in Table 7. Recommendations have been made to address all identified Non-Compliances and Observations (recommendations for improvement).

Table 7 - Statutory Non-Compliances and Observations

No.	Condition	Finding	Recommendation	Risk Level
Project Approval SSI- 22338205				
S2 D47	<p>Prior to commencing construction, the proponent must develop and implement and comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the local Fire Control Centre, and provide a copy of the plan to the local Fire Control Centre. The Proponent must keep two copies of the plan on-site in a prominent position adjacent to the site entry point(s) to the Buronga Substation at all times. The plan must:</p> <p>a) be consistent with:</p> <ul style="list-style-type: none"> • RFS's Planning for Bushfire Protection 2019 (or equivalent); • RFS's Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; • the Fire and Rescue NSW Act 1989; • the Work Health and Safety (WHS) Act 2011; 	<p>The Emergency Plan has been prepared but was not available on the project website at the time of the site inspection.</p> <p>Hard Copies of the plan was located that the Buronga Camp (Photograph 3).</p> <p>The plan is generally consistent with the requirements of the relevant guidelines.</p> <p>SecureEnergy provided the RFS with a copy of the plan and requested input from the RFS.</p> <p>It is noted that no consultation was undertaken during the preparation of Revision 3 of the Emergency Response Plan.</p> <p>It is noted that the Emergency Plan (Section 7.1 Availability of the plan) states that the Emergency Plan will be available on the website. The plan was not available at the time of this IEA.</p>	<p>Upload the Emergency Response plan to the Transgrid Website.</p>	Administrative non-compliance

No.	Condition	Finding	Recommendation	Risk Level
S2 D47h	<p>Prior to commencing construction, the proponent must develop and implement and comprehensive Emergency Plan and detailed emergency procedures The plan must:</p> <p>h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);</p>	<p>Appendix B, titled Asset protection zone, of the Emergency Plan provides aerial photographs of Camps 6 and 7. The asset protection zones are shaded (pink) and an asterisk shows the approximate location of the fire water tanks. The aerial photographs do not show the location of any of the existing site infrastructure. The lack of detail could (infrastructure) could impact the rapid identification of the location of firefighting equipment and water storage.</p>	<p>Update the plans in Appendix B of the Emergency Plan to include plans of each camp site showing the site infrastructure and the location of firefighting water supply tanks.</p>	<p>Administrative non-compliance</p>
S2 E12 b)	<p>Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must:</p> <p>b) keep such information up to date, to the satisfaction of the Secretary</p>	<p>The following superseded documents had not been removed from the Transgrid Website:</p> <ul style="list-style-type: none"> • PECW Stage 2 Heritage CEMP Subplan Rev 1 Public • PECW Stage 1 Heritage CEMP Strategy Rev 4 • PECW Stage 1 Biodiversity CEMP Subplan Rev F Public • PECW Stage 1 Construction Environmental Management Plan Rev 1 • PECW Stage 1 Heritage CEMP Subplan Rev F Public Display Version • PECW Stage 1 Noise and Vibration CEMP Subplan Rev K • PECW Stage 1 Soil and Water CEMP Subplan Rev K • PECW Stage 1 Traffic and Transport CEMP Subplan Rev H • PECW Stage 1 Traffic Strategy Rev F 	<p>Remove superseded documents from the project website.</p>	<p>Administrative non-compliance</p>

No.	Condition	Finding	Recommendation	Risk Level
Observations and Recommendations for Improvement				
S2 D1	<p>Road upgrades, construction, upgrading and decommissioning activities may only be undertaken between:</p> <p>a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays; unless the Planning Secretary agrees otherwise.</p>	<p>The approved hours of construction are documented in the Noise and Vibration Management Plan.</p> <p>OOHW training is provided to supervisors and workers on the project.</p> <p>No complaints relating to OOHW were received during the audit period.</p> <p>Out-of-Hours work was undertaken between 6/9/23 and 12/10/23. A meeting was undertaken with an identified sensitive receiver. A record summarising the discussion regarding the proposed works (Contact Record) was signed by the landowner. The record only states that the landowner was notified of the proposed works. However, there is no agreement or information on noise levels (that is impact on the sensitive receiver), this is required by the Approval Condition, or the landowners' rights should the works cause them problems (these are reasonable requirements of such an agreement).</p> <p>The intent of the Approval Condition, in relation to agreed noise levels, is so that the sensitive receiver is agreeing the impact and the duration of that impact. In this instance, the Auditor is satisfied that there was no impact on sensitive receivers associated with the OOHW, however an improvement in the process to manage future OOHW negotiated agreements is warranted.</p>	<p>Prepare a template "Negotiated Agreement for Out-of-Hours works" that can be used for any future out of hours works negotiations with sensitive receivers. The template should provide appropriate information on the scope of the proposed works, duration of those works and the impact (noise levels etc) of those works, the rights of the sensitive receiver and the obligations of the construction team, so that the sensitive receivers can give informed approval</p>	Observation / Recommendation for Improvement

No.	Condition	Finding	Recommendation	Risk Level
S2 D16	<p>The Proponent must:</p> <p>a) minimise erosion and control sediment generation; and</p> <p>b) ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008);</p>	<p>Sediment tracking onto public road from the Camp 6 and 7 was observed and while the Auditor understands that those roads are swept (mechanical sweeper) at least weekly, that sediment accumulation and therefore dispersion as dust or sediment during rain events can occur.</p> <p>It is noted that the weekly environmental checklist includes confirmation of the operation and maintenance of vehicle wash facilities and other devices including shaker / rumble grids. A recommendation for improvement has been provided.</p>	<p>In order to minimise the tracking and sediment and mud onto sealed public roads from major site access points and camps, it is recommended that:</p> <ol style="list-style-type: none"> 1. The procedure for vehicle washdown, including heavy vehicles, be reviewed with the aim of reducing the tracking of sediment for vehicles that have not been cleaned onto public roads. 2. Develop a standard approach to the assessment of sediment accumulation at site access points and provide a trigger for road sweeping based on sediment load. <p>Consideration be given to the installation of shaker / rumble grids at all significant site access points, including construction camps where construction traffic accesses public roads.</p>	<p>Observation / Recommendation for Improvement</p>

No.	Condition	Finding	Recommendation	Risk Level
S2 D25	<p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <p>a) ensure that no more than:</p> <ul style="list-style-type: none"> • 19.6 hectares (ha) of BC Act listed Sandhill Pine Woodland in the Riverina, Murray-Darling Depression and NSW Southwestern Slopes bioregions; • 0.04 ha of habitat for BC Act listed flora species <i>Acacia acanthoclada</i> (Harrow Wattle); • 0.32 ha of habitat for BC Act and EPBC Act listed flora species <i>Atriplex infrequens</i> (A saltbush); • 1.51 ha of habitat for BC Act listed flora species <i>Austrostipa nullanulla</i> (A spear-grass); • 14 individuals of BC Act listed <i>Santalum murrayanum</i> (Bitter Quandong); and • 6.91 ha of habitat for BC Act and EPBC Act listed fauna species <i>Polytelis anthopeplus monarchoides</i> (Regent Parrot) (eastern subspecies); <p>is cleared for the development; and</p>	<p>The clearing register has been established and the data specified in Condition D25 has been recorded in the clearing register.</p> <p>The Land Clearing and Disturbance Register was reviewed by the Auditor. Based on the records contained in the register and the areas inspected by the Auditor, the spatial area of each flora type listed in Condition D25 has not been exceeded.</p> <p>Elecnor stated that “for as built clearing, our clearing subcontractor provides a spatial dataset which is uploaded to our GIS”. The Auditor understands that the spatial data provided by the clearing subcontractor forms the basis for reporting, and that there is no verification of the accuracy / completeness of that data by, for example by the consultant ecologists who are present on site during clearing or by Elecnor personnel.</p> <p>Given the concerns raised by BCD in relation to the accuracy of clearing data, that following the completion of clearing that an audit (ground truthing) of the extent of clearing be undertaken</p>	<p>Following the completion of clearing an audit (ground truthing) of the extent of clearing be undertaken</p>	<p>Observation / Recommendation for Improvement</p>

No.	Condition	Finding	Recommendation	Risk Level
S2 D25 and S2 D31	Biodiversity and Cultural Heritage Protection	<p>During the inspection of construction areas, including recently cleared areas, the Auditor observed (refer to Photograph 6) that in</p> <ul style="list-style-type: none"> • Clearing through sensitive areas appeared to be appropriately controlled and there was no evidence of obvious exceedances of clearing limits. • Coloured (green) flagging is used to identify no-go areas – in all locations visited, much of the flagging had fallen over / needed reinstatement to ensure that the no-go areas are clearly marked. • Some boundary pegs / posts (white) were missing / fallen over and while there did not appear to any encroachment on areas outside of the approved site boundaries, those boundary markers should be reinstated. 	<p>The boundary and no-go area fencing / flagging in all active construction areas are inspected weekly and all boundary pegs/ no-go area flagging is maintained, and clearly visible to all construction personnel.</p>	<p>Observation / Recommendation for Improvement</p>

7. Independent Audit Post Approval Requirements

This audit focused on the compliance requirements established by the Conditions of Approval. This section of the report covers the specific requirements contained in the DPE Guidelines.

7.1 Summary of Environmental Incidents

No reportable environmental incidents were reported for this audit period.

7.1.1 Incident Response Assessment

The system implemented as documented in the EMS includes:

- Incident reporting;
- Implementation of immediate response actions;
- Incident investigation;
- Development of corrective and preventative actions;
- Reporting (internal and external); and
- Incident record management.

The Auditor was not provided with a copy (or extract from) the project Incident Register and has therefore been unable to assess the implementation of the incident reporting procedures.

7.2 Summary of Complaints

Two complaints were recorded by the Proponent over the Audit Period:

February 2024 - Property Owner on Arumpo Road in Buronga not satisfied with speed of a subcontractor on the road whilst he was walking his livestock across it. He thought the driver was speeding. EnergyConnect investigation and response: *"Management advised of the incident. Investigating incident and signage on road. Elecnor Australia has spoken to the property owner (current landholder). Landholder failed to advise Elecnor Australia of movement of sheep as has been arranged previously due to the unplanned nature and late afternoon timing of stock movement. Stock warning signs not clearly visible on side of road. Driver has apologised to the landholder. Elecnor Australia is assisting the landholder in making stock warning signs more visible to the public".*

February 2024 - Police contacted Elecnor Australia to advise that a member of the public had seen SecureEnergy vehicles travelling at 100km per hour in a 60km zone in the township of Wentworth. Police have advised this is the second time this caller has contacted them. This is the first-time police have contacted Elecnor Australia. EnergyConnect investigation and response: *"Elecnor Australia has contacted the resident. EA workers have been advised at today's pre-start (Tuesday, 20 February 2024) that speeding drivers will be targeted by the Highway Patrol. A review is also underway of any IVMS alerts from the Wentworth area".*

7.2.1 Compliant Management System Assessment

The complaints management system as documented in the EMS includes:

- Complaint reporting;
- Communication protocol (initial and on-going contact with complainants);
- Compliant investigation;
- Development of corrective and preventative actions (where appropriate);
- Reporting (internal and external); and
- Complaint record management.

While the system as described in the EMS is considered appropriate for the project, the Auditor was not provided with an extract from Consultation Manager database and has therefore been unable to assess the implementation of the complaint management and reporting procedures.

7.3 Summary of Notices

No compliance related notices, orders, penalty notices or prosecutions were issued to the project during the audit period.

7.4 Supplementary Approvals and Licences

In addition to the Project Planning Approval, several other approvals and licences are relevant to the work. However are not required to be held by Transgrid for this project. These include:

- Water Access Licence (WAL 7731) which is held by Western Murray Irrigation Ltd and is utilised by SEJV for the purposes of construction water for dust suppression – two bores are located at Fletchers Lake and Alcheringa Drive
- Potable Water – agreement with Council
- Environment Protection Licence (EPL 2029) held by Wentworth Shire Council for the operation of the Buronga Landfill (the disposal site for project waste generated by SEJV).

An Environment Protection Licence is not required for the construction of the Project.

7.5 Project Environmental Management System

The project operates in accordance with the Construction Environmental Management Plan (CEMP) that was prepared in accordance with the requirements of the Project Approval.

The Auditor has concluded that the high degree of compliance identified in this audit indicates the CEMS is appropriate and is being implemented.

7.6 Implementation of the Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the following management plans for the construction phase of the project:

- Construction Environmental Management Plan
- Biodiversity Management Plan
- Soil and Water Management Plan
- Heritage Management Plan
- Traffic Management Plan
- Noise and Vibration Management Plan

During the document review phase of the project the contents of each of the plans were reviewed and were found to reflect the requirements of the Approval. All Plans and Programs adequately identified the relevant project risks and proposed appropriate risk management controls.

7.7 Status of Previous IEA Findings

The previous Independent Environmental Audit was undertaken by Trigalana Environmental, and the audit report was finalised on 21 September 2023.

Table 8 – Status of previous IEA Findings.

Ref.	September 2023 Audit Finding	September 2023 Audit Recommendation	Auditee Response	Status
A3–R1	<p>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.</p>	<p>Water supply tanks have been installed at 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.</p> <p>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).</p>	<p>Signage has been ordered and will be placed on fire water supply tanks.</p> <p>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.</p> <p>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.</p>	<p>Open</p> <p>Signage was not in place at the Camps 6 or 7 Fire Water Tanks</p>
A3–R2	<p>B5 The recommended action from the previous audit has not been completed by the documented due date. The record of the quarterly 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>Review the current processes, content, and focus for:</p> <ul style="list-style-type: none"> • Internal auditing • Quarterly HSSE meetings. 	<p>The Quarterly HSSE forum did include discussion on recent audit findings and compliance with Conditions of Approval.</p> <p>The forum is not formal in nature and not all discussions are documented. The forums are not a requirement of the Project’s management system, consideration of the recommendation will be given to future forums. Internal audit requirements are set by Transgrid and are currently being reviewed.</p>	<p>Closed</p>

Ref.	September 2023 Audit Finding	September 2023 Audit Recommendation	Auditee Response	Status
A3-A3	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>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>	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 style="text-align: center;">Open</p> <p>The bushfire readiness review was not sighted during this IEA.</p>
A3-A4	Traffic management signage has been installed at all key sites observed including Camp 6, Camp 7 and the Water Bore location, the auditor observed the configuration of the signage at the Camp 6 location.	Review the configuration of the signage at the Camp 7 location and make any changes as appropriate.	Traffic management signage at Camp 7 was reviewed and rectified within two days of the Audit site visit.	<p style="text-align: center;">Closed</p> <p>Traffic management signage was in place at Camp 7.</p>
A3-A5	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.	The Project believes that the reporting and notification requirements were adhered to and as such, no further action is required.	<p style="text-align: center;">Open</p> <p>EnergyConnect has elected not to implement the audit recommendation.</p>

7.8 Specialist Auditor Reports

No specialist auditor reports were required as part of this audit.

7.9 Environmental Impacts

The assessment of construction impacts against those predicted in the Environmental Impact Assessment, prepared by WSP (October 2020), are summarised in [Table 9](#).

Table 9 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Landuse	Private landowners may be impacted while construction activities are underway on or in proximity to their property, through the temporary loss of access to parts of their property, a potential loss of privacy and amenity (dust/noise/visual) impacts. Given the short duration of construction works, these potential impacts will be of limited duration. It is also expected that no residents would be required to relocate during the construction phase of the Project. All construction works along the transmission pipeline alignment will take place within the proposed construction footprint.	Construction impacts to date are consistent with those predicted in the EIA.
Biodiversity	The main impacts on biodiversity during construction would be: <ul style="list-style-type: none"> clearing of native vegetation removal of threatened species and/or their habitat 	The clearing to date has occurred within the approved project footprint. Clearing records indicate that the extent of vegetation removal has to date been significantly less than predicted in the EIS.
Hydrology and Flooding	Impacts to flooding from construction of the proposal are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities. Potential impacts would also be limited to periods of flooding, which have a low likelihood of occurring during construction on flood prone areas. Potential impacts to water quality are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities.	No material flooding or surface water impacts have been identified during the audit period.
Hazardous Materials	During construction, potential hazards and risks to the surrounding community or environment may be associated with: <ul style="list-style-type: none"> the on-site storage, handling and transport of dangerous and hazardous goods, contaminated soil and hazardous waste potential interaction with existing utilities potential bushfire risks changes to emergency egress and excavation routes. 	During this audit period, no bushfire or hazardous materials related incidents were recorded.

Category	Predicted Impact	Actual Impacts to Date
Aboriginal Heritage	<p>Impacts from the proposal have been categorised as:</p> <ul style="list-style-type: none"> • direct impacts from activities requiring ground disturbance, such as transmission line structures, Buronga Substation (and asset protection zone), construction work areas, vegetation clearing and establishment of access tracks (referred to as disturbance area A) • potential direct impacts due to trimming vegetation down to two metres in height within the transmission line corridor (referred to as disturbance area B). These works have the potential to impact scarred trees. 	<p>No incidents of unapproved impacts on Aboriginal Cultural Heritage sites or artifacts were identified during this audit period.</p> <p>The management of known heritage sites has been undertaken in accordance with the relevant management plans.</p>
Non-Aboriginal Heritage	No direct impacts on non-Aboriginal heritage items / sites was predicted	No impacts on heritage sites were identified during this IEA.
Visual Amenity	<p>Across all landscape character areas, construction activities would involve the temporary mobilisation of plant throughout the proposal landscape to construct the proposal and to provide ancillary infrastructure (e.g. construction compounds and access tracks). Construction activity would be most prominent around transmission line structure footings, and at the Buronga substation upgrade and expansion site.</p> <p>Vegetation removal would be required, which would mostly comprise of shrubs and groundcovers.</p> <p>Landform modification would be small and localised.</p>	No impacts relating to visual amenity were identified during this IEA.
Soils	<p>Construction of the proposal has the potential to result in soil erosion and impacts to land capability in the absence of adequate management measures. Key construction activities that present a risk to soils include excavation and other earth moving activities, vegetation removal and the movement of vehicles, plant and equipment within unsealed areas. The potential impact of these activities may include:</p> <ul style="list-style-type: none"> • erosion of exposed soils and stockpiled materials • dust generation from • increased sediment loads entering the surrounding waterways • compaction of soils leading to impacts on drainage 	No soil erosion issues were identified during the audit period. However, sediment tracking onto local roads requires on-going attention.
Contamination	Whilst areas known to be contaminated have not been identified, the assessment has identified areas of potential contamination. Construction activities potentially impacting these sites includes vegetation removal, excavation of soils, piling and dewatering activities.	To date no contamination has been encountered..
Acid Sulphate Soils	The majority of the proposal study area is identified as having a low risk of acid sulphate soils. Areas surrounding lakes and river beds are identified as potentially containing acid sulphate soils.	No acid sulphate soils were encountered during this audit period.

Category	Predicted Impact	Actual Impacts to Date
Salinity	Potential impacts from salinity can occur due to disruption of the water table (i.e. when saline groundwater rises and deposits salts in upper soil layers). Disruption can result from vegetation removal, physical barriers, or the reuse of saline soils generated by the proposal.	No salinity related impacts were encountered during this audit period.
Construction Noise and Vibration	There is the potential for concurrent construction activities occurring in proximity to sensitive receivers because of the construction of the transmission line, substation and the two main construction compounds. Based on the results of the above assessment and considering the proximity of the nearest receivers to Buronga substation and main construction compound and accommodation camp sites, the risk of notable construction impacts at the nearest receivers would be low, with concurrent noise levels anticipated to be below relevant construction NMLs.	No noise or vibration related complaints have been received during the audit period.
Construction Air Quality	The assessment of air quality impacts at these identified sensitive receivers found that the impacts to sensitive receivers would be negligible.	No air quality related complaints have been received during the audit period. No air quality impacts from construction have been identified.
Traffic and access	The increase of light vehicles movements by a peak of 250 movements per day and heavy vehicle movements by a peak of 80 movements per day (or to up to an increase of around 1.65 per cent) from current traffic volume would not be expected to adversely impact the capacity and serviceability of the road network and at intersections. Heavy vehicle traffic movements would also be distributed throughout the day to minimise their impact on town centres' peak traffic activities.	No traffic impacts exceeding the predictions in the EIS have been identified. It is noted that two complaints regarding project light vehicle speeding were received during this audit period.

7.9.1 Extent of Project Operations

The original Environmental Assessment and modifications defined the proposed project boundaries. A review of current aerial imagery (Google Maps) and the Auditor's observations during the site inspection found that the construction works are confined to the approved site boundaries.

7.10 Other Matters

No other issues were identified during this IEA.

Appendix A

PEC West Project

Feb 2024 Independent Environmental Audit

Audit Table

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A1	Minimise harm to the Environment	In meeting the specific performance measures and criteria of this approval, 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, operation, rehabilitation, upgrading or decommissioning of the development.		Approvals Manager - No incidents with the potential to cause material harm to the environment have occurred during the audit period.	No evidence of actual or potential material environmental harm was sighted during the site inspection.	No evidence of actual or potential material environmental harm was sighted during the site inspection	Complies	
S2 A2	Terms of Approval	The Development may only be carried out: a. in compliance with this approval				The development is being carried out in general accordance with the Approval. The assessment of compliance against each condition of the approval is presented below.	Noted	
		b. In accordance with all written directions of the Planning Secretary;		Approvals Manager - No directions from DPE were received during the audit period.			Not Triggered	
		c. Generally, in accordance with the EIS; and				No evidence was found that the works undertaken to date associated with SSD 10040 has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
		d. generally, in accordance with the Development Layout in Appendix 1.	Consistency Assessments: <ul style="list-style-type: none"> 45860-HSE-CHK-D-1058_Bonnie Doon Rd Access Track Re-Alignment track changes; 45860-HSE-CHK-D-1059_Silver City Highway Access Points; 45860-HSE-CHK-D-1060_Access Point 84 Laydown; 	Approvals Manager - While changes to the project compared to what was initially approved have been made, these changes have been subjected to Consistency Assessments and do not represent a fundamental or significant change to what has previously been approved.		No evidence was found that the works undertaken to date associated with SSD 10040 has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
S2 A3	Terms of Approval	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval;		Approvals Manager - The only correspondence received from DPHI during the reporting period was the acceptance of the previous audit report and approval of the new auditor.			Not Triggered	
		b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and		Approvals Manager - The only correspondence received from DPHI during the reporting period was the acceptance of the previous audit report and approval of the new auditor.			Not Triggered	
		c) the implementation of any actions or measures contained in these documents.		Approvals Manager - The only correspondence received from DPHI during the reporting period was the acceptance of the previous audit report and approval of the new auditor.			Not Triggered	

SSI 10040

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A4	Terms of Approval	The conditions of this approval 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.					Noted	
S2 A5	Terms of Approval	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition E6.					Noted	
S2 A6	Lapse of Approval	This approval will lapse five years after the date on which it is granted unless construction has physically commenced on or before that time.					Not Triggered	
S2 A7	Evidence of Consultation	Where conditions of this approval require consultation with an identified party, the Proponent must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.				Refer to specific conditions below	Noted	
S2 A8	Protection of Public Infrastructure	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable authority or service provider; b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval.	Incident Register Complaints Register	Approvals Manager - No damage to public infrastructure occurred during the audit period.		No evidence of damage to public infrastructure was identified during this audit period.	Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A9	Demolition	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.		Approvals Manager – no demolition works have been undertaken during this audit period.	No evidence of demolition works was sighted during the site inspection.	No demolition works have been undertaken during this audit period.	Not Triggered	
S2 A10	Structure Adequacy	The Proponent 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 BCA; and where the BCA is not applicable, to the relevant Australian Standard.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Approvals Manager – The substations team has been working through the certification for the SynCon building during the audit period, however the certification hasn't been received during this audit period.		Building works associated with PEC West have not been completed. Certification of those works will be undertaken by SynCon and will be verified during a future IEA.	Not Triggered	
S2 A11	Compliance	The Proponent 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 approval relevant to activities they carry out in respect of the development.	EnergyConnect Environmental Induction (20210221) (PowerPoint presentation) Training PowerPoint Presentations including: <ul style="list-style-type: none"> Erosion & Sediment Control Traffic and Transport Management – Western Section Approvals Biodiversity Heritage Land Access Noise and Vibration Soil and Water Toolbox Meeting Minutes (Sign on sheet examples were provided from the audit period).		The auditor attended the morning Pre-start meeting during the site inspection. During those meetings, critical issues covering safety and environment were presented.	Training materials covering all elements of the approval were reviewed. Records of training from the audit period were sighted.	Complies	
S2 A12	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition.	Extracts from the project maintenance management system were sighted, including: <ul style="list-style-type: none"> Daily (pre-start) check lists Maintenance requests Maintenance records 		Maintenance areas at Camps 6 and 7 were inspected.	Maintenance facilities (generally for light vehicles) are located at each camp. Detailed records of inspections and maintenance were sighted.	Complies	
		b) operated in a proper and efficient manner.			Camps (accommodation, storage and maintenance areas) are well maintained and organised. All plant and equipment operating (on construction areas) appeared to be operational and well maintained.	All facilities, plant and equipment sighted during the audit were operational and appeared to be well maintained.	Complies	
S2 A13	Applicability oof Guidelines	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.					Noted	
S2 A14	Applicability oof Guidelines	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.					Noted	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A15	Community Communications Strategy	Prior to the commencement of construction, the Proponent must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Proponent and the community (including adjoining affected landowners) during construction. The Community Communication Strategy must: a) identify landowners for potentially impacted receivers;	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022	Approvals Manager - The Community Communication Strategy has been uploaded. No modifications have been made to that document during the audit period.		Section 6.1.4 identifies potentially impacted landowners.	Complies	
		b) ensure that the landowners identified in (a) are consulted during construction;	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022			The Strategy identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		c) set out procedures and mechanisms for the regular distribution of information to the wider community;	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022			The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		d) establish a public liaison officer(s) to engage with the local community; and	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022			Section 4 of the Strategy identifies the public liaison officers.	Complies	
		e) set out procedures and mechanisms: • through which the community can discuss or provide feedback to the Proponent; • through which the Proponent will respond to enquiries or feedback from the community; and • to resolve any issues and mediate any disputes that may arise in relation to construction of the development. The Proponent must implement the Community Communication Strategy for the duration of construction.	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022			The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
S2 A16	Environmental Representative	Prior to commencing the development, an environmental representative (ER) must be approved by the Secretary and engaged by the Proponent.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Approvals Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller has been appointed as the Independent ER. DPE approval was provided on 15/10/21.	Complies	
S2 A17	Environmental Representative	The Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Approvals Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller has been appointed as the Independent ER. DPE approval was provided on 15/10/21.	Complies	
S2 A18	Environmental Representative	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2 and is independent from the design and construction of the development. The ER must meet only the requirements set out in sections 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Approvals Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller has been appointed as the Independent ER. DPE approval was provided on 15/10/21.	Complies	

SSI 10040									
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation	
S2 A19	Environmental Representative	From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must: a) review the documents identified in conditions A15, B1, B2, D3, D10, D11, D29, D37 D47, D52 and D53, and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department);					All plans covered by Condition S2 A19 were reviewed and endorsed by the ER prior to the commencement of construction (prior to this audit period).	Complies	
		b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and		Environmental Representative (telephone interview 25/3/2024) – The ER was not required to assist in the resolution of community complaints during this audit period.			The ER was not required to assist in the resolution of community complaints during this audit period.	Not Triggered	
		c) consider any minor amendments to be made to the plans / strategies in conditions A15, D11, D52, D53, E3, E4, E5, E6, E7 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval.		Environmental Representative (telephone interview 25/3/2024) – during the audit period one plan (the Camp Management Plan) was revised. The plan was provided to the ER for review and endorsement.			The ER reviewed and approved the minor amendments to the Camp Management Plan. It is noted that all subplans have recently been revised to conform with the Elecnor plan template (for consistency. Those changes are minor, administrative changes. However, those plans have not yet been provided to the ER for review and approval.	Complies	
S2 A20	Environmental Representative	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A19, as well as the complaints register for any complaints received (on the day they are received)		Environmental Representative (telephone interview 25/3/2024) – The ER was not required to review and endorse any Out of Hours Works requests. The ER is satisfied that they were provided with all documentation they request during this audit period.			The ER is satisfied that they were provided with all documentation they request during this audit period.	Complies	
S2 B1	Construction Environmental Management Plan	Prior to commencing construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 2, dated 6 July 2022 Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) - Stage 2 CEMP and sub-plans", dated 15 July 2022				The current version of the CEMP is revision 2, covering the Stage 2 works. The plan was approved by the ER on 7 March 2022 and the Planning Secretary on 15 July 2022. The CEMP was not updated during the audit period.	Complies	

SSI 10040									
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation	
S2 B2	Construction Environmental Management Plan	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1.	Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) - Stage 2 CEMP and sub-plans", dated 15 July 2022 Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Project EnergyConnect - NSW - Western Section (SSI-10040) Stage 2 — Use of Bonnie Doon Road as a Secondary Access Route", dated 28 June 2023	Approvals Manager - The management plans have recently been updated to reflect Elecnor's template. As this is an administrative update, the project is seeking DPHI's agreement to undertaking no consultation.		The required consultation was undertaken during the preparation of the original Stage 2 sub-plans. Minor (administrative – document template) update of the sub-plans was undertaken during this audit period. DPE agreement that no consultation (as the technical elements of the plans have not changed) be required. It is noted that the current versions of all plans (available on the Transgrid project website) are the approved, consulted versions.	Complies		
	Table 1	Required Plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan						
		Noise and Vibration	Council						
		Soil and Water	DPIE Water						
		Biodiversity	BCS Council						
		Heritage	Heritage NSW Aboriginal Stakeholders						
Traffic and Transport	TfNSW Council								
S2 B3	Construction Environmental Management Plan	Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation must be provided with the relevant CEMP Sub-Plan.				DPE approval letters note that the CEMP and all associated subplans have prepared in consultation with the relevant stakeholders and contain all the information required by the conditions of approval.	Complies		
S2 B4	Construction Environmental Management Plan	Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event prior to commencing construction.					Noted		
S2 B5	Construction Environmental Management Plan	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, must be implemented for the duration of construction. Where construction of the development is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the Planning Secretary.	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 2, dated 6 July 2022 Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) - Stage 2 CEMP and sub-plans", dated 15 July 2022			Stage 2 Construction commenced on 18/7/22 following formal notification to DPE on the 23/6/22.	Complies		
S3 B6	CEMP and Subplan requirements	The CEMP and CEMP Sub-plans required under this approval must be prepared by suitably qualified and experienced persons in accordance with relevant guidelines, and include where relevant: a) a summary of relevant background or baseline data; b) details of: (i) the relevant statutory requirements (including any relevant approval or licence conditions); (ii) any relevant limits or performance measures and criteria; and	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 2, dated 6 July 2022			Environmental Management documentation was prepared by suitably qualified and experienced individuals and contain the relevant details as required by this condition.	Complies		

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 B6	CEMP and Subplan requirements (Continued)	<p>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</p> <p>c) any relevant commitments or recommendations identified in the EIS;</p> <p>d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>e) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and</p> <p>(ii) effectiveness of the management measures set out pursuant to paragraph d);</p> <p>f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</p> <p>g) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>h) a protocol for managing and reporting any:</p> <p>(i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion;</p> <p>(ii) complaint; or</p> <p>(iii) failure to comply with other statutory requirements;</p> <p>i) set out the procedures that would be implemented to:</p> <p>(i) keep the local community and relevant agencies informed about the construction and environmental performance of the development;</p> <p>(ii) receive, handle, respond to, and record complaints;</p> <p>(iii) resolve any disputes that may arise;</p> <p>(iv) respond to any non-compliance;</p> <p>(v) respond to emergencies; and</p> <p>j) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and</p> <p>k) a protocol for periodic review of the CEMP and associated Sub-plans and programs.</p>	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 2, dated 6 July 2022			Environmental Management documentation was prepared by suitably qualified and experienced individuals and contain the relevant details as required by this condition.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C1	Operational Environmental Management Plan	An Operational Environmental Management Plan (OEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures made and identified in the EIS will be implemented and achieved during operation. This condition (condition C1) does not apply if condition C2 of this approval applies.	Not Triggered				Not Triggered	
S2 C2	Operational Environmental Management Plan	An OEMP is not required for the development if the Proponent has an Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the EMS: a) the performance outcomes, commitments and mitigation measures, made and identified in the EIS, and specified relevant terms of this approval can be achieved; b) issues identified through ongoing risk analysis can be managed; c) there is a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this approval; d) there is a strategic framework for environmental management of the development; e) the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development is clear; and f) procedures are in place for: • keeping the local community and relevant agencies informed about the operation and environmental performance of the development; • receiving, handling, responding to, and recording complaints; • resolving any disputes that may arise; • responding to any non-compliance; and • responding to emergencies.	Not Triggered				Not Triggered	
S2 C3	Operational Environmental Management Plan	Prior to commencing operation, the OEMP or EMS or equivalent as agreed with the Planning Secretary must be prepared to the satisfaction of Planning Secretary.	Not Triggered				Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D1	Construction Hours	Road upgrades, construction, upgrading and decommissioning activities may only be undertaken between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays; unless the Planning Secretary agrees otherwise.	Out of Hours Works (PowerPoint training presentation) Toolbox - Out of Hours Works (PowerPoint training presentation) Complaints Register Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 1, Revision K, dated 8 March 2022.	Approvals Manager – SecureEnergy met with the potentially impacted landowner of land on which the OOHW were to be undertaken. That landowner does not live at the premises, he lives in Mildura, approximately 40km away from the works. There was no-one at the property during the outage works. The nearest resident lives about 5-6km away. The landowner was made aware of the activities that would occur and had no concerns at all about the OOH works. Irrespective of this, the works were managed to ensure that the louder activities (ie foundation works) occurred during the day under live lines, not out of hours. There were no complaints, and to date we've not received any complaints at all in relation to noise.		The approved hours of construction are documented in the Noise and Vibration Management Plan. OOHW training is provided to supervisors and workers on the project. No complaints relating to OOHW were received during the audit period. Out-of-Hours work was undertaken between 6/9/23 and 12/10/23. A meeting was undertaken with an identified sensitive receiver. A record summarising the discussion regarding the proposed works (Contact Record) was signed by the landowner. The record only states that the landowner was notified of the proposed works. However, there is no agreement or information on noise levels (that is impact on the sensitive receiver), this is required by the Approval Condition, or the landowners' rights should the works cause them problems (these are reasonable requirements of such an agreement). The intent of this Condition is to ensure any impacted receiver agrees to the potential impact and the duration of that impact. In this instance, the Auditor is satisfied that there was no impact on sensitive receivers associated with the OOHW, however an improvement in the process to manage future OOHW negotiated agreements is warranted.	Complies	Recommendation for Improvement - Prepare a template "Negotiated Agreement for Out-of-Hours works" that can be used for any future out of hours works negotiations with sensitive receivers. The template should provide appropriate information on the scope of the proposed works, duration of those works and the impact (noise levels etc.) of those works, the rights of the sensitive receiver and the obligations of the construction team, so that the sensitive receivers can give informed approval.
S2 D2	Construction Hours	The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition D1 above: a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons;		Approvals Manager – No deliveries or dispatches from the project were required NSW Police or other public authorities during this audit period.		No deliveries or dispatches from the project were required NSW Police or other public authorities during this audit period.	Noted	
		b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or		Approvals Manager – No emergency OOHW were required during this audit period.		No emergency OOHW were required during this audit period.	Noted	
		c) works carried out in accordance with the hours and noise limits specified in any negotiated agreements with sensitive receivers (owners and occupiers), provided the negotiated agreements are in writing and finalised before the commencement of works.	Record of Contact Form – the form records the outcome of a meeting with a potentially impacted landowner for out of hours work planned for the period 6/9/23 to 8/10/23 (seven days per week / 7am to 6pm with potential night works 6pm to 7am). Location of landowner: Lower Darling Road, Wentworth.	Approvals Manager - Construction works associated with the outage of the X2 Broken Hill line were completed in accordance with an agreement with the affected landowner (record of contact provided to Auditor).	Out-of-Hours work was undertaken between 6/9/23 and 12/10/23. A meeting was undertaken with an identified sensitive receiver. A record summarising the discussion regarding the proposed works (Contact Record) was signed by the landowner. The record only states that the landowner was notified of the proposed works. However, there is no agreement or information on noise levels (that is impact on the sensitive receiver), this is required by the Approval Condition, or the landowners' rights should the works cause them problems (these are reasonable requirements of such an agreement). The intent of the Approval Condition, in relation to agreed noise levels is so that the sensitive receiver is agreeing the impact and the duration of that impact. Therefore, the requirement of Condition D2 c) below for a negotiated agreement has not been met.	Noted		

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D3	Construction Hours	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of works which are outside the hours defined in conditions D1, D2, and D7 The Protocol must be approved by the Planning Secretary before commencing works. The Protocol must: a) be prepared in consultation with Council;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 1, Revision K, dated 8 March 2022 Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision H, dated 8 March 2022.	Approvals Manager - No revisions to this protocol occurred during the audit period.		The current version of the Out of Hours Works Protocol (Appendix A of the Construction Noise and Vibration Management Plan) was prepared and approved prior to this audit period. The protocol was prepared in consultation with Wentworth Council.	Complies	
		b) provide a process for the consideration of out-of-hours works against the relevant noise and vibration criteria, including the determination of low and high-risk activities;	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision H, dated 8 March 2022.			The protocol defines the process for OOHW assessment and approval.	Complies	
		c) provide a process for the identification of mitigation measures for potential impacts, including respite periods in consultation with any affected receivers;	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision H, dated 8 March 2022.	Approvals Manager - No revisions to this protocol occurred during the audit period.		The protocol provides a process for identification of mitigation measures to be applied to specific OOHWs.	Complies	
		d) provide a process for the identification of out-of-hours works undertaken by third parties in the vicinity of the site, and coordination of out-of-hours works with these third parties to achieve respite periods in locations where receivers may be affected by concurrent activities;	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision H, dated 8 March 2022.	Approvals Manager - No revisions to this protocol occurred during the audit period.		The protocol defines the process for OOHW assessment and approval for third parties.	Complies	
		e) identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: • low risk activities can be undertaken without the approval of the Planning Secretary and with the approval of the ER; and • high risk activities that are approved by the Planning Secretary; and	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision H, dated 8 March 2022.	Approvals Manager - No revisions to this protocol occurred during the audit period.		The protocol defines the approval process that considers the risk of activities, proposed mitigation, management.	Complies	
		f) identify Department, Council and community notification arrangements for approved out of hours work.	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision H, dated 8 March 2022.	Approvals Manager - No revisions to this protocol occurred during the audit period.		The protocol identifies the Department, Council and community notification arrangements for approved out of hours work	Complies	
S2 D4	Construction and Demolition Noise	The Proponent must take all reasonable and feasible steps to minimise the construction, upgrading or decommissioning noise of the development in the locations where the noise is audible to sensitive receivers, including any associated traffic noise.			During the inspection of works compounds and construction on the easement, no rock breaking, blasting or impulsive noise generating activities were observed.	No noise complaints were recorded during the audit period. No intensive noise generating activities were observed during the site inspection.	Complies	

SSI 10040

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D5	Construction and Demolition Noise	The Proponent must implement mitigation measures: a) to ensure that the noise generated by any construction, upgrading or decommissioning activities is managed in accordance with the requirements for construction 'noise affected' management levels established in accordance with Interim Construction Noise Guideline (DECC, 2009); and b) with the aim of achieving the road traffic noise	Complaints Register	Approvals Manager - No noise monitoring occurred during the audit period.		Current construction activities are in sparsely populated areas with a considerable buffer distance between construction activities and residential receivers. No high noise generating activities were observed during the audit inspection, although it is noted that wood chipping and stump grinding would be undertaken during vegetation clearing. No complaints have been received during the audit period for noisy activities (including OOH work).	Complies	
S2 D6	Construction and Demolition Noise	The Proponent must comply with the following vibration limits: a) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); b) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and c) vibration limits set out in the German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures (for structural damage).	Complaints Register	Approvals Manager - No vibration monitoring occurred during the audit period.		Current construction activities are in sparsely populated areas with a considerable buffer distance between construction activities and residential receivers. No vibration generating activities were observed during the audit inspection. No vibration relating complaints have been received during the audit period.	Complies	
S2 D7	Construction and Demolition Noise	Blasting may only be carried out on the site between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.		Approvals Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
S2 D8	Blasting Limit Conditions	The Proponent must ensure that any blasting carried out on the site does not exceed the criteria in Table 2.	All blast monitoring records covering this audit period.	Approvals Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
	Table 5	Location Any non-associated residence	Airblast overpressure	Ground Vibration	Allowance			
			dB (Lin Peak)					
			120					
115	5	5% of the total number of blasts or events over a rolling period of 12 months						

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D9	Operational Noise	The Proponent must implement all reasonable and feasible measures with the aim of ensuring that the noise generated by the operation of the development does not exceed 40 dB(A) LAeq,15min, at the reasonably most affected point of the residence, in accordance with the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.	Not Triggered				Not Triggered	
S2 D10	Operational Noise	<p>Within 12 months of the date of this approval, the Proponent must prepare an Operational Noise Review to confirm noise predictions and control measures that would be implemented for the operation of the development. The Review must:</p> <p>a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;</p> <p>b) be prepared in consultation with the landowner of impacted residences;</p> <p>c) identify residences predicted to experience noise levels that exceed 40 dB(A) LAeq,15min at the reasonably most affected point of the residence, determined in accordance with the NSW Noise Policy for Industry (EPA, 2017);</p> <p>d) detail the noise mitigation measures to achieve the noise criteria identified, including the timing of implementation;</p> <p>e) provide evidence of consultation with affected landowners;</p> <p>f) include a consultation strategy to seek feedback from directly affected landowners on the noise mitigation measures; and</p> <p>g) identify procedures for the management of operational noise complaints.</p> <p>The Proponent must implement any identified mitigation measures prior to the commencement of operation.</p>	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.			Renzo Tonin have been appointed by Transgrid to prepare the ONR and have been approved by DPE. Operational Noise Review (ONR) was due on 28 September 2022 (12 months following date of project approval). DPE Provided an extension to the preparation of the Operational Noise Review to the 28/2/23. The Operational Noise Review was completed on the 27/2/23 in accordance with this revised timeframe.	Complies	
S2 D11	Operational Noise Monitoring	<p>Within 6 months of the commencement of operations (or the commencement of operation of a stage, if the development is to be staged), the Proponent must:</p> <p>a) undertake noise monitoring to determine whether the development is complying with the relevant conditions of this approval; and</p> <p>b) submit a copy of the monitoring results to the Department.</p>	Not Triggered				Not Triggered	
S2 D12	Operational Noise Monitoring	The Proponent must undertake further noise monitoring of the development if required by the Planning Secretary.	Not Triggered				Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation	
S2 D13	Noise and Vibration CEMP Sub-Plan	The Noise and Vibration CEMP Sub-Plan required under condition B2 must: a) ensure the requirements in conditions D1 to D12 are complied with;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision H, dated 6 July 2022. Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) - Stage 2 CEMP and sub-plans", dated 15 July 2022				The current version of the CEMP and NVMP were prepared and approved during a previous audit period (15 July 2022). The NVMP provides a framework designed to ensure compliance with Conditions D1 to D12.	Complies	
		b) include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision H, dated 6 July 2022.				Section 7.2 of the NVMP describes the noise and vibration mitigation measures to be implemented.	Complies	
		c) include a detailed description of the noise and vibration management system for the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision H, dated 6 July 2022.				Section 1.4 of the plan describes the environmental management system as it applies to noise and vibration management.	Complies	
		d) include a protocol for the identification, notification and management of works that exceed the noise management levels; and	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision H, dated 6 July 2022.				Section 8 of the plan describes compliance management, including the notification requirements and management of works that may exceed noise criteria.	Complies	
		e) include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management system.	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision H, dated 6 July 2022.				Section 8.3 (Table 8.1) describes the noise and vibration monitoring program.	Complies	
S2 D14	Air Quality	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and	Incident Register Complaints Register			During the site inspection water carts were observed operating at the Buronga Camp (Camp 6) and the substation construction site. Some dust was observed from vehicle movements on-site, however no evidence of migration of dust off-site was observed.	Water carts are available and were observed to be in operation to reduce dust emissions during the site inspection.	Complies	
		b) minimise the surface disturbance of the site.				The clearing limits associated with the construction of the accommodation camps, laydown areas and the transmission line alignment are generally appropriately delineated. In all areas inspected (note that the inspection sampled construction areas and did not include the entire transmission line easement) no evidence of clearing outside of designated clearing limits was sighted. An area between the Buronga Camp and substation has been rehabilitated (refer to Photograph 1).	All vegetation clearing observed appeared to be limited to the approved construction limits.	Complies	
S2 D15	Water Supply	The Proponent must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. <i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the development.</i>		Approvals Manager – sufficient water has been available for the project during the audit period. No water licenses are required for this project.				Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D16	Erosion and Sediment Control	The Proponent must: a) minimise erosion and control sediment generation; and b) ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008);	Erosion and Sediment Control Strategy EnergyConnect (NSW – Western Section), Revision D, dated 23 July 2021. Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision H, dated 6 July 2022. Weekly environmental checklists (examples from the audit period). CEPSC inspections reports from the audit period.	Approvals Manager - The details of CPESCs involved in project works during the audit period are as follows: Regional Project Consulting Adam Pullen B.Env.Mgt.M.Env.Eng(Hons). CPESC Weekly environmental inspections are undertaken by Environmental Advisors. The contract CPES undertook (and reported on ERSED inspections reports during the audit period.	During the site inspection the following observations were made: <ul style="list-style-type: none"> Surface water management (surface drains, sedimentation / retention ponds) are provided at each of the accommodation camps / laydown areas and key construction areas such as the Buronga Substation. Top soil that has been stripped is stockpiled for future use. Vehicle wash facilities are available at each camp. The Auditor observed the vehicle wash in operation at the Buronga Camp. However, vehicles including trucks can exit the camps without using the vehicle wash. Trucks were observed leaving the Buronga Camp without using the wheel / vehicle wash. Sediment tracking was evident at the exits to Camps 6 and 7. Photograph 2 shows the vehicle wash at Camp 6 and sediment tracking onto Arumpo Rd. While each camp has a cattle grid at the site entrance, no rumble grids, suitable for assisting in removing sediments and dust from heavy vehicles are in place. 	Appropriate erosion and sediment (surface water management) controls were in place at all sites inspected during this IEA. Routine environmental inspections are undertaken (weekly) and these are recorded on standard checklists. An external ERSED specialist undertakes additional inspections and provides advice to the project. The management of erosion and sediment control is being undertaken in accordance with the approved management plan. Sediment tracking onto public road from the Camp 6 and 7 was observed and while the Auditor understands that those roads are swept (mechanical sweeper) at least weekly, that sediment accumulation and therefore dispersion as dust or sediment during rain events can occur. It is noted that the weekly environmental checklist includes confirmation of the operation and maintenance of vehicle wash facilities and other devices including shaker / rumble grids. A recommendation for improvement has been provided.	Complies	In order to minimise the tracking and sediment and mud onto sealed public roads from major site access points and camps, it is recommended that: <ol style="list-style-type: none"> The procedure for vehicle washdown, including heavy vehicles be reviewed with the aim of reducing the tracking of sediment for vehicles that have not been cleaned onto public roads. Develop a standard approach to the assessment of sediment accumulation at site access points and provide a trigger for road sweeping based on sediment load. Consideration be given to the installation of shaker / rumble grids at all significant site access points, including construction camps where construction traffic accesses public roads.
S2 D17	Pollution of Waters	Unless otherwise authorised by an EPL, the Proponent must ensure the development does not cause any water pollution, as defined under Section 120 of the POEO Act.		Approvals Manager – No water related incidents or non-compliances have occurred during this audit period.		No water related incidents or non-compliances were recorded during this audit period.	Complies	
S2 D18	Pollution of Waters	The Proponent must: a) ensure that appropriate components of the concrete batching plants and substation are suitably bunded; and b) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.		Approvals Manager – there are no batching plants located within the project boundaries, all concrete used on the PEC West is supplied from commercial batching plants.	Fuel and chemical storage areas were inspected at Camps 6 and 7. All fuels are stored in double skinned, bunded tanks that comply with AS1940. All chemical storage and potentially hazardous waste storage observed were appropriately contained. Spill kits were available at those locations.	No concrete batching is undertaken on this project. All fuels and chemicals observed were stored appropriately.	Complies	
S2 D19	Pollution of Waters	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision H, dated 6 July 2022.	Approvals Manager – no groundwater dewatering was undertaken during the audit period.	No groundwater dewatering observed during the site inspection.	No groundwater dewatering was undertaken during the audit period.	Not Triggered	
S2 D20	Riparian Areas	The Proponent must ensure: a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), unless DPIE Water agrees otherwise; and b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.	Incident Register	Approvals Manager - No riparian zone incidents have occurred during the audit period.	The Auditor inspected works near (dry) water courses, however no construction activities were observed in riparian zones.	No riparian zone incidents have occurred during the audit period.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D21	Flooding	The Proponent must ensure that the development: a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council.		Approvals Manager - No consultation with council has been required regarding flooding design for works undertaken during the audit period. No flooding events have occurred during the audit period.		A detailed assessment of flooding and water management issues was undertaken during the previous audits. No changes in design have occurred during this audit period. No flooding impacts have occurred during this audit period.	Complies	
S2 D22	Acid Sulphate Soils	The Proponent must ensure that any construction activities in identified areas of acid sulphate soil risk are undertaken in accordance with the <i>Acid Sulphate Soil Manual</i> (Acid Sulphate Soil Management Advisory Committee, 1998).	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision H, dated 6 July 2022.	Approvals Manager - No ASS has been encountered during the audit period. If encountered PASS would be managed in accordance with the SWMP. Current activities are outside the areas of known acid sulphate soil risk areas.		Current activities are outside the areas of known acid sulphate soil risk areas.	Not Triggered	
S2 D23	Salinity	The Proponent must ensure that any construction activities in identified areas of moderate to high salinity are undertaken in accordance with the Salinity Training Manual (DPI, 2014) and Book 4 Dryland Salinity: Productive use of Saline Land and Water (NSW DECC, 2008).	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision H, dated 6 July 2022.	Approvals Manager - No works have occurred within high salinity areas during the audit period. Consequently, no salinity management activities have been undertaken.		No works have occurred within high salinity areas during the audit period.	Not Triggered	
S2 D24	Soil and Water CEMP Sub-Plan	The Soil and Water CEMP Sub-Plan required under condition B2 must include provisions for: a) ensuring the requirements in conditions D15 to D23 are complied with;	Soil and Water Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision H, dated 6 July. Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) - Stage 2 CEMP and sub-plans", dated 15 July 2022	Approvals Manager - No reviews or revisions of Soil and Water Management Plan have taken place during the audit period.		The Soil and Water Management Plan provides an appropriate framework to manage compliance with the relevant conditions of the Approval. Revision H of the Soil and Water Management Plan was approved by DPE on 15 July 2022.	Complies	
		b) managing flood risk during construction;	Soil and Water Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision H, dated 6 July.			Section 5.5 of the SWMP describes the proposed flood response procedures for the project.	Complies	
		c) investigating, assessing and managing contaminated land, soils and groundwater in the development area;	Soil and Water Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision H, dated 6 July.			Section 5.3 of the Plan describes the procedures for management of contaminated materials. Section 6.3 of the plan describes the monitoring program for soils and water.	Complies	
		d) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; and	Soil and Water Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision H, dated 6 July.			Investigating, assessing and managing contaminated land is addressed in Section 3.4 and Table 5.1 Investigating, assessing and managing soil is addressed in Section 3.2 and Table 5.1. Investigating, assessing and managing groundwater is addressed in Section 3.3.5 and Table 5.1.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D24	Soil and Water CEMP Sub-Plan	e) managing any unexpected and / or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction.	Soil and Water Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision H, dated 6 July.			Appendix B of the plan describes the management of unexpected finds (including hazardous materials).	Complies	
S2 D25	Biodiversity Restrictions on and Habitat	Unless otherwise agreed with the Planning Secretary, the Proponent must: a) ensure that no more than: • 19.6 hectares (ha) of BC Act listed Sandhill Pine Woodland in the Riverina, Murray-Darling Depression and NSW Southwestern Slopes bioregions; • 0.04 ha of habitat for BC Act listed flora species <i>Acacia acanthoclada</i> (Harrow Wattle); • 0.32 ha of habitat for BC Act and EPBC Act listed flora species <i>Atriplex infrequens</i> (A saltbush); • 1.51 ha of habitat for BC Act listed flora species <i>Austrostipa nullanulla</i> (A spear-grass); • 14 individuals of BC Act listed <i>Santalum murrayanum</i> (Bitter Quandong); and • 6.91 ha of habitat for BC Act and EPBC Act listed fauna species <i>Polytelis anthopeplus monarchoides</i> (Regent Parrot) (eastern subspecies); is cleared for the development; and	Biodiversity Management Plan EnergyConnect (NSW – West), Revision F, dated 10 June 2022. Land Clearing and Disturbance Register 45860-HSE-REG-G-1008.	Approvals Manager – the areas of habitat cleared is less than that specified in Condition D25.	The Auditor inspected a sample of cleared areas during this IEA. No evidence of clearing beyond approved areas was sighted.	The clearing register has been established and the data specified in Condition D25 has been recorded in the clearing register. The Land Clearing and Disturbance Register was reviewed by the Auditor. Based on the records contained in the register and the areas inspected by the Auditor, the spatial area of each flora type listed in Condition D25 has not been exceeded. Elecnor stated that “for as built clearing, our clearing subcontractor provides a spatial dataset which is uploaded to our GIS”. The Auditor understands that the spatial data provided by the clearing subcontractor forms the basis for reporting, and that there is no verification of the accuracy / completeness of that data by, for example by the consultant ecologists who are present on site during clearing or by Elecnor personnel. Given the concerns raised by BCD in relation to the accuracy of clearing data, that following the completion of clearing that an audit (ground truthing) of the extent of clearing be undertaken.	Complies	Following the completion of clearing an audit (ground truthing) of the extent of clearing be undertaken
		b) minimise: • the impacts of the development on hollow-bearing trees; • the impacts of the development on threatened bird and bat populations; and • the clearing of native vegetation and key habitat.	Biodiversity Management Plan EnergyConnect (NSW – West), Revision F, dated 10 June 2022.	Site Inspection Observations: Clearing works were inspected near the line stringing site adjacent to TWR 78. The corners of TWR 78 pad were marked with survey pegs and no works, equipment or parking was observed outside of the cleared area. No evidence (eg tyre tracks) outside of the cleared area was observed. The stringing pad was not clearly pegged off fenced, however no works, parking or storage was observed outside of the cleared area. During the inspection of construction areas, including recently cleared areas, the Auditor observed (refer to Photograph 6) that in <ul style="list-style-type: none"> Clearing through sensitive areas appeared to be appropriately controlled and there was no evidence of obvious exceedances of clearing limits. Coloured (green) flagging is used to identify no-go areas – in all locations visited, much of the flagging had fallen over / needed reinstatement to ensure that the no-go areas are clearly marked. Some boundary pegs / posts (white) were missing / fallen over and while there did not appear to any encroachment on areas outside of the approved site boundaries, those boundary markers should be reinstated 	Detailed clearing procedures have been documented and implemented as per the Biodiversity Management Plan. Pre-clearing surveys are undertaken to identify all trees to be removed, habitat trees and areas to be protected (for biodiversity and cultural heritage purposes). Clearing is being undertaken by a clearing contractor and is guided by GPS and GIS systems with live data available to the clearing crew. A clearing register is maintained by the Environment Manager. Clearing and Ground disturbance permits are held by the clearing contractor). The permit is signed by the project ecologist and includes key ecological items including: <ul style="list-style-type: none"> Exclusion Zones Preclearing ecologist inspection Requirement for a fauna spotter Requirement for nest boxes Retention of habitat features 	Complies	The boundary and no-go area fencing / flagging in all active construction areas are inspected weekly and all boundary pegs/ no-go area flagging is maintained, and clearly visible to all construction personnel.	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B26	Biodiversity Off-set Package	<p>Prior to carrying out any development that would impact on biodiversity values, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and to the satisfaction of the Secretary in writing. The Package must include, but not necessarily be limited to:</p> <p>(a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS;</p> <p>(b) the cost for each specific biodiversity offset measure, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measure is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW) and the offsets payment calculator that was established as at 29 July 2021);</p> <p>(c) the timing and responsibilities for the implementation and delivery of the measures required in the Package; and</p> <p>(d) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 31 December 2023.</p> <p>Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p>	<p>Project EnergyConnect (NSW Western Section) Biodiversity Offset Package 14/3/22</p> <p>Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.</p>			DPE approved the biodiversity offset package on 16/3/22, prior to this audit period.	Complies	
S2 B27	Biodiversity Off-set Package	<p>Prior to carrying out any development that could impact the biodiversity values requiring offset, the Proponent must establish an escrow account and pay into that account \$48 million, in accordance with the Deed of Agreement with the Planning Secretary executed on 13 September 2021. The Proponent must comply with the terms of the Deed.</p>	<p>Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.</p>			Escrow account fund was established prior to project approval and was therefore in place prior to any development that could impact biodiversity values prior to offset such as construction or any other minor works such as local road upgrades etc.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D28	Biodiversity CEMP Subplan	<p>The Biodiversity CEMP Sub-Plan required under condition B2 must include:</p> <p>a) a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • minimising the amount of native vegetation clearing within the approved development footprint; • minimising the loss of key fauna habitat, including tree hollows; • minimising the impacts on fauna on site, including undertaking pre-clearance surveys; • minimising the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species; • rehabilitating and revegetating disturbance areas; • protecting native vegetation and key fauna habitat outside the approved disturbance area; • maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and revegetation of the site; • collecting and propagating seed (where relevant); • controlling weeds; • controlling erosion; and • bushfire management; 	<p>Biodiversity Management Plan EnergyConnect (NSW – West) Stage 2, Revision F, dated 10 June 2022.</p> <p>Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) - Stage 2 CEMP and sub-plans", dated 15 July 2022</p>			<p>Biodiversity management measures are described in Section 5 of the Biodiversity Management Plan. DPE approved Revision F of the plan on 15 July 2022.</p>	Complies	
		<p>b) details of the Proponent's commitment to make a one off \$150,000 funding contribution targeted at further scientific study into the impacts of electric and magnetic fields on birds in Australia;</p>	<p>Biodiversity Management Plan EnergyConnect (NSW – West), Revision F, dated 10 June 2022.</p>			<p>Table 2.1 states that "Transgrid will make a one off \$150,000 funding contribution targeted at further scientific study into the impact of electric and magnetic fields on birds in Australia at the commencement of operations".</p>	Complies	
		<p>c) preparation and implementation of a two year bird impact monitoring program at the commencement of operations; and</p>	<p>Biodiversity Management Plan EnergyConnect (NSW – West), Revision F, dated 10 June 2022.</p>			<p>Table 2.1 states that "Transgrid will prepare and implement a two year bird monitoring program at the commencement of operations".</p>	Complies	
		<p>d) a detailed program to monitor and report on the effectiveness of these measures</p>	<p>Biodiversity Management Plan EnergyConnect (NSW – West), Revision F, dated 10 June 2022.</p>			<p>Section 6 of the plan describes the biodiversity monitoring program to be implemented.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D29	Aboriginal Cultural Heritage Strategy	Prior to commencing construction, the Proponent must provide an Aboriginal Cultural Heritage Strategy, prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The Strategy must: a) identify any additional risk zones outside the potential archaeological deposits (PADs) where construction must not commence until subsurface testing in b) and surveys in c) are complete;	Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Stage 2, Revision G, dated 14 October 2022.			The Aboriginal Cultural Heritage Management Strategy was prepared prior to the commencement of construction. The current version of the strategy was issued in October 2022. Appendix B of the strategy identifies areas that require additional investigations prior to clearing of those areas.	Complies	
		b) describe additional subsurface testing that will be undertaken to confirm the significance of the PADs that would be impacted by the final transmission infrastructure design and ancillary facilities in line with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010);	Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Revision 7, dated 14 October 2022.			Appendix C describes the test excavation methodology to be used to determine the significance of the PADs that will be impacted by the project.	Complies	
		c) describe additional Aboriginal heritage surveys that will be undertaken where ground disturbance activities are required outside of the heritage survey area;	Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Revision 7, dated 14 October 2022.			Appendix D describes the survey methodology to be to areas outside of the project that will be impacted by the project.	Complies	
		d) include details of ongoing consultation with the Aboriginal stakeholders, including any written responses and records of any meetings; and	Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Revision 7, dated 14/10/22.			An updated ACHAR (Appendices E and F of the Strategy) has been prepared that addresses on-going stakeholder consultation, including consultation records.	Complies	
		e) include an updated Aboriginal cultural heritage assessment report, which: • is based on the findings of the subsurface testing in b) and surveys in c); • describes any potential additional impacts to heritage items; • identifies further mitigation measures, including avoidance or salvage; • includes detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and • provides an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative	Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Revision 7, dated 14 October 2022.			An updated ACHAR is provided in Appendices E and F of the Strategy.	Complies	
S2 D30	Avoidance and Salvage	The Proponent must implement all reasonable and feasible measures to avoid and minimise harm to heritage items and potential archaeological deposits (PADs) identified in the EIS and the Aboriginal Cultural Heritage Strategy required by condition D29, prior to carrying out any development that could harm the items or deposits.	Letter from Everick Heritage (V Edmonds) to Elecnor (C Curlewis) titled “EnergyConnect stage 1 – expected find– t246-247 shell scatter results and Significance assessment”, dated 18 January 2024.	Approvals Manager - One expected find was recorded during the audit period. The letter report provided by the Project Archaeologist has been provided.		EnergyConnect have appointed a heritage specialist to undertake pre-clearance surveys with members of the local aboriginal groups. No incidents or complaints related to damage to cultural heritage items were identified during this audit.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D31	Avoidance and Salvage	The Proponent must ensure the development does not cause any harm to heritage items identified for avoidance in the approved Aboriginal Cultural Heritage Strategy or any Aboriginal heritage items located outside the approved development footprint.		Approvals Manager - No impacts on heritage items identified for avoidance have occurred during the audit period.		No impacts on heritage items identified for avoidance have occurred during the audit period.	Complies	
S2 D32	Avoidance and Salvage	Prior to carrying out any activity that could harm heritage items, the Proponent must salvage and relocate all heritage items identified for salvage and relocation in the updated and approved Aboriginal Cultural Heritage Strategy to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010).		Approvals Manager - Salvage of heritage items in the vicinity of the Great Darling Anabranch were completed during the audit period. A salvage report for PEC West is currently being prepared by Project Archaeologists.		EnergyConnect has appointed a heritage specialist to undertake pre-clearance surveys with members of the local aboriginal groups. EnergyConnect maintains a register of salvaged items. A copy of the register was not available to the auditor for review.	Complies	
S2 D33	Avoidance and Salvage	The Proponent must ensure the development does not cause any harm to heritage items PEC-W-H-1 and PEC-W-SE-H1.	Incident Register	Approvals Manager - Neither of these sites have been impacted by the Project during the audit period.	<p>During the inspection of construction areas, including recently cleared areas, the Auditor observed (refer to Photograph 6) that in</p> <ul style="list-style-type: none"> Clearing through sensitive areas appeared to be appropriately controlled and there was no evidence of obvious exceedances of clearing limits. Coloured (green) flagging is used to identify no-go areas – in all locations visited, much of the flagging had fallen over / needed reinstatement to ensure that the no-go areas are clearly marked. Some boundary pegs / posts (white) were missing / fallen over and while there did not appear to any encroachment on areas outside of the approved site boundaries, those boundary markers should be reinstated. 	No heritage related incidents were reported during the audit period.	Complies	The boundary and no-go area fencing / flagging in all active construction areas are inspected weekly and all boundary pegs/ no-go area flagging is maintained, and clearly visible to all construction personnel.

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation	
S2 D34	Heritage CEMP Subplan	The Heritage CEMP Sub-Plan required under condition B2 must:	Heritage Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision G, dated 24 June 2022						
		a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;	Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) - Stage 2 CEMP and sub-plans", dated 15 July 2022				DPE approved revision G of the Heritage Management Plan on 15 July 2022.	Complies	
		b) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • addressing the outcomes of the additional assessment, testing and surveys identified in condition D29; • protecting the heritage items identified in conditions D31 and D33, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved development corridor; • salvaging and relocating the heritage items identified in condition D32; • minimising and managing the impacts of the development on heritage items within the development corridor, including: <ul style="list-style-type: none"> – a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> – heritage items outside the approved disturbance area are damaged; – previously unidentified heritage items are found; or – Aboriginal skeletal material is discovered; • ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and • ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and 	Heritage Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision G, dated 24 June 2022				The Heritage Management Subplan provides in the information required by Condition D34.	Complies	
c) include a program to monitor and report on the effectiveness of these measures and any heritage	Heritage Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision G, dated 24 June 2022					Monitoring and reporting on Heritage compliance is covered in Sections 6.3, 6.4, 6.5, and 6.6 of the Heritage Management Plan.	Complies		

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D35	Traffic and Transport	All over-dimensional vehicles associated with the development must only travel to and from the site via the Primary Access Routes described in the EIS, as identified in the figure in Appendix 2, unless the Planning Secretary agrees otherwise.	Drive Code of Conduct Energy Connect, Revision 2, dated 8 May 2023. Complaints Register			The Drivers Code of Conduct contains details of all approved heavy vehicle routes. DPE approved the addition of Bonnie Doon Road as an access route. No complaints were received during the audit period relating to heavy vehicle routing.	Complies	
S2 D36	Traffic and Transport	All heavy and light vehicles associated with the development: a) must travel to and from the site via the Primary Access Route described in the EIS, as identified in the figure in Appendix 2; and b) may travel to and from the site via the Secondary Access Routes and Water Supply Routes, subject to the requirements in conditions D37 and D38, to the satisfaction of the relevant roads authority, unless the Planning Secretary agrees otherwise.	Drive Code of Conduct Energy Connect, Revision 2, dated 8 May 2023. Complaints Register			The Drivers Code of Conduct contains details of all approved heavy vehicle routes. DPE approved the addition of Bonnie Doon Road as an access route. No complaints were received during the audit period relating to heavy vehicle routing.	Complies	
S2 D37	Traffic Strategy	Prior to commencing construction, the Proponent must prepare a Traffic Strategy, in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary, which: a) for all access routes: • identifies the location and type of any necessary road upgrades (including roads, intersections, crossing points and access points), including consideration of relevant amenity impacts; • ensures that any road upgrades comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), unless the relevant roads authority agrees otherwise; • includes a detailed assessment of potential impacts of any necessary road upgrades (such as heritage and biodiversity impacts), including consideration of appropriate mitigation measures; • identifies whether intersections, crossing points and access points would be permanent or temporary; and • includes measures for notifying, seeking feedback from and addressing the concerns of impacted residents along the routes;	Traffic Management Strategy EnergyConnect (NSW – Western Section) Stage 2, Revision 3, dated 8 May 2023. Letter from DPIE (D Crinnion) to Transgrid (J Fisher) titled "Project EnergyConnect - NSW - Western Section (SSI-10040) Stage 2 — Use of Bonnie Doon Road as a Secondary Access Route", dated 28 June 2023.			Revision 2 of the Traffic Strategy was prepared to include the addition of Boonie Doon Road for site access. DPE approved the use of Boonie Doon Road and Revision 2 of the Strategy on 28 June 2023. The revised strategy satisfies the requirement of Condition D37.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		<p>b) include oversize overmass requirements and management;</p> <ul style="list-style-type: none"> • provides detailed usage of the routes, including maximum daily numbers of heavy and light vehicles and approximate durations of use; • includes an assessment of dust impacts to any residences along the routes and identifies mitigation measures to minimise any impacts; and • identifies any residences along the routes that would experience road traffic noise above the relevant assessment criteria from Table 3 in NSW Road Noise Policy (DECCW, 2011) due to project-related traffic and identifies mitigation measures to minimise impacts. 	<p>Traffic Management Strategy EnergyConnect (NSW – Western Section) Stage 2, Revision 3, dated 8 May 2023.</p>			<p>The revised strategy satisfies the requirement of Condition D37 b).</p>	<p>Complies</p>	
S2 D38	Traffic Strategy	<p>Prior to commencing construction, the proponent must implement the road upgrades and the mitigation measures identified in the Traffic Strategy in condition D37, to the satisfaction of the relevant roads authority and the Planning Secretary, respectively.</p>	<p>Letter from TfNSW (S Fairweather) to Transgrid (L Ryan) titled “WAD Anabranch South BAR/BAL HW22 Silver City Highway WST21/00260 - Notice of Practical Completion”, dated 24 November 2023.</p> <p>Condition D38 compliance statement – Silver City Highway EnergyConnect (NSW - Western Section), Revision B, dated 21 November 2023.</p>	<p>Approvals Manager - One access point has been constructed during the audit period.</p> <p>Evidence of TfNSW approval of Silver City Hwy access point has been received and the D38 Compliance Statement acknowledgement from the Department has been received.</p>		<p>TfNSW confirmed practical completion of the road upgrades. DPE confirmed receipt (without comment) of the Compliance Statement prepared by Elecnor in relation to compliance with this Condition.</p>	<p>Complies</p>	
S2 D39	Road Maintenance	<p>The Proponent must:</p> <p>a) undertake an independent dilapidation survey to assess the:</p> <ul style="list-style-type: none"> • existing condition of all local roads on the transport route (including local road crossings) prior to construction, upgrading or decommissioning works; and • condition of all local roads on the transport route (including local road crossings): <ul style="list-style-type: none"> - within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority; - on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority; <p>b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings), if dilapidation surveys identify that the road has been damaged by the development during construction, upgrading or decommissioning works; in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary.</p>	<p>Email from Pavement Transport Systems (F Noun) to Elecnor (G Maler) titled “2021266 Road Dilapidation Survey 2024”, dated 9 April 2024.</p>	<p>Approvals Manager - During the audit period, a yearly survey was completed. The reports will be submitted this month.</p>		<p>Correspondence was available to verify that the annual road dilapidation survey was undertaken. Compliance with this condition could not be verified.</p>	<p>Complies</p>	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 D40	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: a) details of the transport route to be used for all development-related traffic;	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 3, dated 8 May 2023			Revision 3 of the Traffic Management Plan was prepared to include the addition of Boonie Doon Road for site access. DPE approved the use of Boonie Doon Road and Revision 3 of the Plan on 28 June 2023. Section 5 of the plan describes the approved traffic routes.	Complies	
		b) details of the road upgrade works required by condition D38 of this approval;	As above			Section 6.2 describes the Condition D38 upgrade works.	Complies	
		c) details of the measures that would be implemented to: • minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including: - a description of the proposed dilapidation surveys required by condition D39 of this approval; - a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camps; - temporary traffic controls, including detours and signage; - procedures for stringing cables and transmission lines across roads; - notifying the local community about development-related traffic impacts; - procedures for receiving and addressing complaints from the community about development-related traffic; - minimising potential cumulative traffic impacts with other projects in the area; - minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queuing on the public road network; - implementing measures to minimise development-related traffic on the public road network outside of standard construction hours; - minimising dirt tracked onto the public road network from development-related traffic; employee use of this service;	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 3, dated 8 May 2023			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	
S3 D40	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: c) details of the measures that would be implemented to: - details of the employee shuttle bus	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 3, dated 8 May 2023			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		service (if proposed), including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage <ul style="list-style-type: none"> - encouraging car-pooling or ride sharing by employees; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - ensuring loaded vehicles entering or leaving the site have their loads covered or contained; - responding to any emergency repair or maintenance requirements; - provisions for maintaining emergency vehicle access at all times; - a traffic management system for managing over-dimensional vehicles; and - fatigue management. <ul style="list-style-type: none"> • comply with the traffic conditions in this approval; 						
		d) include a drivers code of conduct that addresses: <ul style="list-style-type: none"> • travelling speeds; • procedures to ensure that drivers to and from the development adhere to the designated over-dimensional and heavy vehicle routes; • procedures to ensure that drivers to and from the development implement safe driving practices; and • include a detailed program to monitor and report on the effectiveness of these measures and the code of conduct; and 	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 3, dated 8 May 2023			The Drivers Code of Conduct is provided in Appendix A.	Complies	
		e) a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding.	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 3, dated 8 May 2023			The Flood Response Plan is provided in Appendix B.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D41	Visual Impact Mitigation	<p>Unless the Planning Secretary agrees otherwise, for a period of 2 years from the commencement of operations, the owners of R1489, R2022 and R2023 may ask the Proponent to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage). Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner.</p> <p>These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the transmission line and towers from the residence and its curtilage, and commensurate with the level of visual impact on the residence.</p> <p>All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.</p> <p>If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p>a) To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of transmission lines and towers from any other locations on the property other than the residence and its curtilage.</p>					Not Triggered	
S2 D42	Visual Appearance	<p>The Proponent must:</p> <p>a) minimise the off-site lighting impacts of the development; and</p>	Complaints Register.		Camps 6 and 7 were inspected. No lighting issues (for example intrusive light on residential properties or road users) were identified.	<p>Site compound locations are not visible from the residential areas and are unlikely to cause any visual impacts.</p> <p>The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users. No lighting complaints were received during the audit period.</p>	Complies	
		<p>b) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.</p>			Signage at site access points across the construction corridor were observed. No signage considered to breach this condition was observed.	<p>No advertising signs or logos were observed at either site, other than for the purposes of site identification and safety.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D43	Lighting	The Proponent must: a) take all reasonable steps to minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development: • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.	Complaints Register.		Camps 6 and 7 were inspected. No lighting issues (for example intrusive light on residential properties or road users) were identified.	Site compound locations are not visible from the residential areas and are unlikely to cause any visual impacts. The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users. No lighting complaints were received during the audit period.	Complies	
S2 D44	Dangerous Goods	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Incident Register		During the site inspection, the Auditor inspected fuel and other hazardous materials storage facilities. All flammable and combustible materials sighted were stored in appropriately bunded containers / areas compliant with AS1940. Spill cleanup kits were located adjacent to storage areas. The storage and management of hazardous materials is of a high standard.	The storage and management of hazardous materials is of a high standard and meets the requirements of the relevant Australian Standards.	Complies	
S2 D45	Electrical and Magnetic Fields	The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz – 100kHz) (ICNIRP, 2010).	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.			Three design studies have been undertaken for the transmission lines and incorporate the requirements of the (ICNIRP) Guidelines. Each study concludes that the power frequency electric and magnetic field levels near ground level are confirmed to be acceptable to humans, livestock and plants.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D46	Bushfire Safety	The Proponent must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.	Approvals Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period.	Complies	
		b) ensure that the development: • complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; • is suitably equipped to respond to any fires on site, including provision of a 20,000-litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps; • incorporates the recommendations of a fire risk assessment as per TransGrid's design standards;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.	Approvals Manager - The additional accommodation modules that were installed at Camp 6 were installed in the same manner as the existing modules	Fire water tanks at Camps 6 and 7 were sighted. Neither tank was clearly signposted. (Photographs 4 and 5).	The Accommodation Camp Management Plan describes the fire control strategies and resources available. The firewater tanks are not clearly signposted (refer to recommendation from last Independent Audit Report).	Complies	
		c) ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019;	SecureEnergy Project Energy Connect - Camp 3 4x4 Accommodation Floor Plan			Plans for the camp building include specifications for compliance with the relevant fire standards and BAL specifications.	Complies	
		d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;	Email from NSW RFS (S Walker) to SecureEnergy (R Walker-Edwards) titled "Project EnergyConnect (NSW Western) - Emergency Plan for review", dated 10 March 2022 (Email trail evidencing SecureEnergy's attempts to seek input from the RFS). PowerPoint presentation titled "Project Overview FRNSW".	Approvals Manager – RFS did not respond to our request for input into the Emergency Plan. A meeting was held with FRNSW at which we presented our fire management strategy.		SecureEnergy requested RFS input during the preparation of the Emergency Plan, however the RFS did not respond. A presentation was provided to FRNSW on the fire management strategy.	Complies	
		e) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and		Approvals Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period.	Not Triggered	
		f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.					Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D47	Emergency Plan	Prior to commencing construction, the proponent must develop and implement and comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the local Fire Control Centre, and provide a copy of the plan to the local Fire Control Centre. The Proponent must keep two copies of the plan on-site in a prominent position adjacent to the site entry point(s) to the Buronga Substation at all times. The plan must:	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023. Email from NSW RFS (S Walker) to SecureEnergy (R Walker-Edwards) titled "Project EnergyConnect (NSW Western) - Emergency Plan for review", dated 10 March 2022 (Email trail evidencing SecureEnergy's attempts to seek input from the RFS).		Hard Copies of the plan was located that the Buronga Camp (Photograph 3).	The Emergency Plan has been prepared but was not available on the project website at the time of the site inspection. Hard Copies of the plan was located that the Buronga Camp (Photograph 3). The plan is generally consistent with the requirements of the relevant guidelines. SecureEnergy provided the RFS with a copy of the plan and requested input from the RFS. It is noted that no consultation was undertaken during the preparation of Revision 3 of the Emergency Response Plan. It is noted that the Emergency Plan (Section 7.1 Availability of the plan) states that the Emergency Plan will be available on the website. The plan was not available at the time of this IEA.	Non-Compliance	Upload the Emergency Response plan to the Transgrid Website.
		b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 4 of the plan identifies fire hazards and risks.	Complies	
		c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 8 (Emergency Response) describes the procedures to be implemented to address a fire on or near the site(s).	Complies	
		d) list works that should not be carried out during a total fire ban;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 6.3.1 describes the activities that must not be carried out during a total fire ban.	Complies	
		e) include availability of fire suppression equipment, access and water;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 7.4 describes the location and availability of fire fighting water supplies.	Complies	
		f) include procedures for the storage and maintenance of any flammable materials	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 6.4 describes the management of flammable materials.	Complies	
		g) 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;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 7.5 describes site access for emergency vehicles and Section 9.1 provides emergency contact information.	Complies	
		h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Appendix B, titled "Asset protection zone", of the Emergency Plan provides aerial photographs of Camps 6 and 7. The asset protection zones are shaded (pink) and an asterisk shows the approximate location of the fire water tanks. The aerial photographs do not show the location of any of the existing site infrastructure. The lack of detail could (infrastructure) could impact the rapid identification of the location of firefighting equipment and water storage.	Non-Compliance	Update the plans in Appendix B of the Emergency Plan to include plans of each camp site showing the site infrastructure and the location of firefighting water supply tanks.

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D47	Emergency Plan	i) include location of hazards (physical, chemical and electrical) that may impact on fire fighting activities and procedures to manage identified hazards during fire fighting activities;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Appendix A provides details of the location of fire hazards.	Complies	
		j) include details of the location, management and maintenance of any Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Appendix B and Section 6.1 address the asset protection zones.	Complies	
		k) include bushfire emergency management planning;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 7 describes bushfire preparedness.	Complies	
		l) include details of the 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 that have the potential to ignite surrounding vegetation; and 	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Section 9 describes emergency communications procedures.	Complies	
		m) include details on how live transmission infrastructure can be safely isolated in an emergency.	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.			Table 2.1 in Section 2.2 states "Site personnel should not attempt fire control activities near energized lines. In the event there is a fire near powerlines, early notification will be communicated to TransGrid or the respective electricity company / transmission line asset owner to allow an assessment of risks associated with deenergising the powerline".	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D48	Waste	Waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities: a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	Waste Management Plan EnergyConnect (NSW - Western Section) Revision C, dated 27 February 2024.		Recycling facilities (skip bins) are available on site for both general waste and recyclable waste. Typical waste storage is shown on Photograph 3.	A waste management plan has been prepared and implemented for the project. Facilities for collections, segregation and storage of wastes are provided at each camp. Waste that is unable to be recycled are disposed of at the Buronga Waste Disposal Facility. Waste tracking register includes general waste, sanitary bin waste, concrete, contaminated soil, hydrocarbon waste and timber.	Complies	
S2 D49	Waste	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.		Approvals Manager - No waste importing has been undertaken by the Project during the audit period.	No evidence of the importation of wastes was sighted during the site inspections.	No importation of waste onto the project site was reported for this audit period.	Not Triggered	
S2 D50	Waste	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Cleanaway waste collection invoices covering the audit period.	Approvals Manager – Cleanaway is contracted to provide waste and recycling bins, and to collect wastes for processing (recycling) or disposal.		Waste records from Cleanaway covering the audit period were sighted. The records indicate that all wastes collected by Cleanaway were managed in accordance with this Condition.	Complies	
S2 D51	Waste	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	(Project EnergyConnect (NSW-Western Section) Waste Classification Report for soils exported from the site in January 2024			Waste classification reports (including laboratory certificates) for soils removed from the project were sighted.	Complies	

SSI 10040									
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation	
S2 D52	Accommodation Camp	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan to the satisfaction of Council, unless the Planning Secretary agrees otherwise. The plan must: a) ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards, in consultation with Council;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023. Letter from the ER (C Weller) to SecureEnergy (R Walker-Edwards) titled "EnergyConnect (NSW – Western Section) (SSI-10040) Accommodation Camp Management Plan (Rev 5) ER Approval", dated 18 December 2023.	Approvals Manager – a minor amendment to the Accommodation Plan was made in October last year to remove reference to Clough and to reflect the approved number of camps.			The Accommodation Management Plan has been prepared and implemented. Section 2.4 of the plan references the standards and guidelines used to develop the plan. The ER reviewed and approved the minor changes to the plan on 18 December 2023.	Complies	
		b) ensure the accommodation camp complies with conditions D21 and D46;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.				The Accommodation Management Plan provides an appropriate framework for compliance against the condition of approval.	Complies	
		c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction: • complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) guidelines for irrigation water quality; • meets the requirements of the Public Health Act 2010;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.				The reuse of treated wastewater is described in Section 7.4 and 7.5 of the Accommodation Management Plan.	Complies	
		d) include measure for dust suppression within the accommodation camps;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.				Dust management is described in Section 7.5 of the Plan.	Complies	
		e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.				Site layout plans are provided in Section 4.1 (Figures 4.1 and 4.2).	Complies	
		f) include measures to support local suppliers in servicing the camp where possible.	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.				Engagement of local suppliers is covered in Section 8.3.	Complies	
		Following approval, the Proponent must implement the Accommodation Camp Management Plan.	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.			Camps 6 and 7 were inspected and appeared to be set out and operated in general accordance with the Accommodation Management Plan.	Camps 6 and 7 were being operated in general accordance with the Accommodation Management Plan at the time of this audit.	Complies	

SSI 10040									
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation	
S2 D53	Local Business and Employment Strategy	Prior to commencing construction, the Proponent must prepare a Local Business and Employment Strategy for the development in consultation with Council. This strategy must investigate options for prioritising the employment of local and Aboriginal workforce and suppliers for the construction of the development, where feasible. The Proponent must implement the Accommodation and Employment Strategy.	Agency Consultation Report EnergyConnect (NSW – Western Section) Local Business and Employment Strategy, Revision A Dated 11 March 2022. Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.				The Local Business and Employment Strategy has been prepared and implemented. A Local Industry Participation Manager (LIPM) has been appointed to identify opportunities for local goods and services and facilitate their procurement. The Local industry and indigenous participation is monitored and reported internally on a monthly basis. In addition, an Indigenous Participation Manager has been appointed whose role is to promote indigenous participation on the project.	Complies	
S2 D54	Rehabilitation	Within 6 months of the completion of construction, upgrading or decommissioning, unless the Planning Secretary agrees otherwise, the Proponent must rehabilitate the areas where ancillary facilities, accommodation camps and earthwork material sites are located, to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.						Not Triggered	
S2 E1	Revision of Strategies, Plans and Programs.	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 month of the:		Approvals Manager - No reportable incidents occurred during the audit period.		No reportable incidents occurred during the audit period.	Not Triggered		
		• submission of an incident report under condition E6;		Approvals Manager - The previous audit report (SSI-10040 – Project EnergyConnect (NSW Western Section)) was submitted to DPPI on 21 September 2023. No documents were revised as a result of the previous IEA.		Management assessed that the findings of the last audit report did not warrant any specific plan revisions.	Complies		
		• submission of an audit report under condition E11; or						Not Triggered	
		• any modification to the conditions of this approval.				No Modifications to the Approval occurred during this audit period.	Not Triggered		

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E2	Staging, combining or revision of Strategies, Plans and Programs.	With the approval of the Planning Secretary, the Proponent may: a) prepare and submit any strategy, plan or program required by this approval 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);	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Approvals Manager – no changes to the staging of plans or strategies have occurred during this audit period. All required plans and strategies were submitted prior to this audit period.		All required plans and strategies were submitted prior to this audit period. Compliance with this condition was assessed during the previous audit period.	Complies	
		b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Approvals Manager – No approval has been sought for the combining of any plans, programs, or similar documents.		No approval has been sought for the combining of any plans, programs, or similar documents.	Not Triggered	
		c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 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 approval. 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. If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.		Approvals Manager - The Secretary did not request the review of any post approval documents during this audit period.		The Secretary did not request the review of any post approval documents during this audit period.	Not Triggered	
S2 E3	Notification	Prior to commencing construction, operations, upgrading or decommissioning of the development or, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencing the relevant phase. If any of these phases of the development are to be staged, then the Proponent 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.	Letter from Transgrid (S Troughton) to DPE (Planning Secretary) titled "EnergyConnect (NSW – Western Section) (SSI-10400) – Notification of Commencement Construction for Stage 1 (Condition E3)", dated 18 July 2022.			Notification of the commencement of works (both Stages 1 and 2) were issued to the Planning Secretary prior to the commencement of those works.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E4	Final Layout Plans	<p>Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including:</p> <p>a) details on siting of transmission towers, ancillary infrastructure and / or ancillary facilities; and</p> <p>b) showing comparison to the approved layout.</p> <p>The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.</p>	<p>Final Layout Plans (as issued to the Department)</p> <p>Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.</p>	<p>Approvals Manager - Updates have been made to the Final Layout Plans subsequent to the previous audit period to reflect changes made during detailed design.</p>		<p>Final layout plans were submitted to the Department prior to the commencement of construction. DPE confirmed receipt of the final layout plans for stages 1 and 2. Updates have been made to the Final Layout Plans subsequent to the previous audit period to reflect changes made during detailed design. The ER (personal communication) verified that revised plans are currently being reviewed.</p>	Complies	
S2 E5	Work as Executed Plans	<p>Prior to commencing operations, the Proponent must submit plans that confirm the constructed layout of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.</p>					Not Triggered	
S2 E6	Incident Notification, Reporting and Response	<p>The Department must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the 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 3.</p>		<p>Approvals Manager - No reportable incidents occurred during the audit period.</p>		<p>No reportable incidents occurred during the audit period.</p>	Not Triggered	
S2 E7	Non-compliance Notification	<p>The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.</p>		<p>Approvals Manager - No known non-compliances against the Planning Approval occurred during the audit period.</p>		<p>The proponent was not aware of any non-compliances against the approval occurred during the audit period.</p>	Not Triggered	
S2 E8	Non-compliance Notification	<p>A non-compliance notification must identify the development and the application number for it, set out the condition of approval 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.</p>		<p>Approvals Manager - No known non-compliances against the Planning Approval occurred during the audit period.</p>		<p>The proponent was not aware of any non-compliances against the approval occurred during the audit period.</p>	Not Triggered	
S2 E9	Non-compliance Notification	<p>A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>		<p>Approvals Manager - No known non-compliances against the Planning Approval occurred during the audit period.</p>		<p>The proponent was not aware of any non-compliances against the approval occurred during the audit period.</p>	Not Triggered	
S2 E10	Notification to Landholders	<p>Prior to the commencement of construction, the Proponent must notify the owners of the owners of R1489, R2022 and R2023 of their rights under condition D41.</p>	<p>Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.</p>			<p>Landowners of R2022, R149, R2023 were formally notified in accordance with this condition.</p>	Complies	

SSI 10040

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E11	Independent Environmental Audit	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.			Initial audit undertaken on 17 and 18 August 2022, within 3 months of construction commencement. Subsequent two audits were undertaken 6 monthly and in compliance with this condition.	Complies	
S2 E12	Access to Information	Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must: a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website: (i) the EIS; (ii) current statutory approvals for the development; (iii) approved strategies, plans or programs required under the conditions of this approval; (iv) the proposed staging plans for the development if the construction, decommissioning and/or operation of the development is to be staged; (v) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents various plans and programs approved under the conditions of this approval; (vi) a record of complaints, which is to be updated on a monthly basis; (vii) any independent environmental audit, and the Proponent's response to the recommendations in any audit; and (viii) any other matter required by the Planning Secretary; and	https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents			All approved plans were available on the Transgrid Website at the time of preparation of this audit report.	Complies	

SSI 10040

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E12	Access to Information	b) keep such information up to date, to the satisfaction of the Secretary.	https://www.transgrid.com.au/project-innovation/energyconnect/determinations-and-post-approval-documents			<p>The following superseded documents had not been removed from the Transgrid Website:</p> <ul style="list-style-type: none"> • PECW Stage 2 Heritage CEMP Subplan Rev 1 Public • PECW Stage 1 Heritage CEMP Strategy Rev 4 • PECW Stage 1 Biodiversity CEMP Subplan Rev F Public • PECW Stage 1 Construction Environmental Management Plan Rev 1 • PECW Stage 1 Heritage CEMP Subplan Rev F Public Display Version • PECW Stage 1 Noise and Vibration CEMP Subplan Rev K • PECW Stage 1 Soil and Water CEMP Subplan Rev K • PECW Stage 1 Traffic and Transport CEMP Subplan Rev H • PECW Stage 1 Traffic Strategy Rev F 	Non-Compliance	Remove superseded documents from the project website.

Audit Photographs



Appendix B



Photograph 1 - Rehabilitated Area PEC West



Photograph 2 - Buronga Camp Exit



Photograph 3 – Waste Segregation and Storage



Photograph 4 - Camp 6 Fire Water Tanks



Photograph 5 - Camp 7 Fire Water Tank



Photograph 6 - No-Go area fencing for PAD site

DPE Auditor Approval

Appendix C



Department of Planning and Environment

Contact: Georgia Dragicevic
Phone: 4247 1852
Fax: 4224 9470
Email: Georgia.Dragicevic@planning.nsw.gov.au

Mr Luke Fania
Environment and Sustainability Manager
NSW Electricity Networks Operations Pty Limited
180 Thomas Street
HAYMARKET, NSW, 2000
5 December 2023

Dear Mr Fania

**Project EnergyConnect (NSW - Western Section) (SSI-10040)
Independent Environmental Auditor 2023**

I refer to your letter dated 30 November 2023, seeking the agreement of the Planning Secretary of the Department of Planning and Environment (“the department”) of the suitability of the auditor’s qualifications, experience and independence to undertake an independent audit of the Project EnergyConnect (NSW - Western Section) (“the development”), in accordance with Schedule 2, Condition E11 of State significant infrastructure approval SSI 10040 (“the approval”).

Having considered the qualifications and experience of Mr Ken Holmes of Barnett and May Pty Ltd, the Planning Secretary endorses the appointment of Mr Holmes to undertake the audit in accordance with Condition E11 of the approval. This approval is conditional on Mr Holmes being independent of the development and maintaining Exemplar Global certification. The department reserves the right to request an alternate auditor or audit team for future audits.

Please ensure this correspondence is appended to the Audit Report.

The audit is to be conducted in accordance with the Department’s Independent Audit Post Approval Requirements (May 2020). A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Planning Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Yours sincerely

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

Stakeholder Consultation

Appendix D

From: [Katrina O'Reilly](#)
To: [Ken Holmes](#)
Subject: RE: Project Energy Connect PEC West - Independent Environmental Audit - Consultation Request DPE
Date: Friday, 2 February 2024 9:36:04 AM

Good morning Ken,

NSW Planning would like the below areas to be focused on:

- Implementation of commitments in all management plans.
- Erosion and sediment control measures and management.
- Tracking of areas disturbed/cleared vs approved.
- Adequate approvals for access roads/interfaces with the roads authority.
- OOHW management and communication with neighbours.
- Aboriginal and European site/s management and protection.
- Threatened species management and protection.
- Fire and emergency controls, management and prevention.
- Complaints register management and actions.
- Assessment of actual impact vs EA predictions.

Regards

Katrina

From: Ken Holmes <Ken@baecka.com.au>
Sent: Saturday, 13 January 2024 3:27 AM
To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Subject: Project Energy Connect PEC West - Independent Environmental Audit - Consultation Request DPE

Katrina,

The NSW planning approval (SSI 10040) for the Project Energy Connect (Western Section) requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six monthly audit. The audit is scheduled for late February and will be undertaken accordance with the Project Approval (Condition C15) that requires:

E11 Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that DPE may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you

suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baecka.com.au

A PO Box 365 Belrose NSW 2085

Thank you for seeking BCD's input into the ongoing audits for Project Energy Connect West.

In relation to Condition D25, please review the clearing spatial data that is being used to inform the clearing register, particularly in the partial disturbance areas. BCD has concerns that the quantum of impacts calculated from Transgrid's disturbance layer (based on GIS data) may be underestimating the actual impacts on-ground, which could have an impact on any future recalculation of credits. It is noted from the previous audit that the clearing register is suggesting only 11 ha of impact in the partial disturbance areas, compared to the predicted 242 ha in the EIS. While a reduction of impact was to be expected, the size of this reduction combined with the issue discussed below suggests it requires investigation.

Attached is a clearing comparison example where we have compared an image provided by Transgrid from February 2023 claiming to show the "actual clearing" against a recent aerial image showing the on-ground impacts at the same location. As can be seen in the attached comparison example, the "actual clearing" only appears to map the track which the clearing machinery has taken but does not include the actual tree/s that were cleared by the machinery. We have circled three main areas within the example where this is evident. For reference, the clearing comparison example is located just south of an existing substation on Pooncarie Road at - 33.868682, 142.020982.

BCD had requested that the previous audit (completed in August 2023) confirm that the clearing register includes all areas cleared and impacted, including any clearing, and mulching that occurs beyond the GPS tracked machinery. While the response from that audit was that "The clearing register is comprehensive and includes all the relevant information so that compliance with D25 and the commitments made in the EIS and subsequent BDAR addendum reports can be reported on", it is not evident whether the spatial data being used to inform the clearing register was compared against the on ground clearing activities, particularly in the partial disturbance areas.

From: [Jarrod Smith](#)
To: [Ken Holmes](#)
Subject: RE: Project Energy Connect PEC West - Independent Environmental Audit - Consultation Request Crown Lands
Date: Wednesday, 17 January 2024 11:14:31 AM
Attachments: [image001.png](#)

Good morning Ken,

The Department has no specific concerns regarding the Project Energy Connect works on Crown Land but look forward to the reviewing the results of the audit.

Kind regards,

Jarrod Smith

Group Leader – Property Management – Far West

Crown Lands | Department of Planning, Housing and Infrastructure

T 02 6883 5448 | M 0448 074 738 | E jarrod.smith@crowland.nsw.gov.au

Level 1, 45 Wingewarra Street, DUBBO NSW 2830 | PO Box 2185, DANGAR NSW 2309

www.crownland.nsw.gov.au



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

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Saturday, 13 January 2024 3:48 AM
To: Jarrod Smith <jarrod.smith@crowland.nsw.gov.au>
Subject: Project Energy Connect PEC West - Independent Environmental Audit - Consultation Request Crown Lands

Jarrood,

The NSW planning approval (SSI 10040) for the Project Energy Connect (Western Section) requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the proponent to undertake the next six monthly audit. The audit is scheduled for late February and will be undertaken accordance with the Project Approval (Condition C15) that requires:

E11 Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the

Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that Crown Lands may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baecka.com.au

A PO Box 365 Belrose NSW 2085



Department of Climate Change, Energy, the Environment and Water

Our ref: OUT24/341

Ken Holmes
Principal Environmental Auditor
Barnett & May
Email: ken@baecka.com.au

Date: 15 January 2024

Subject: Project Energy Connect (Western Section) Independent Environmental Audit (SSI-10040)

Dear Ken,

I refer to your request seeking advice from the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

The department understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.

Department of Climate Change, Energy, the Environment and Water

- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception, or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW - Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,



Panayiotis Panaretos
A/Senior Project Officer
Water Assessments
Department of Climate Change, Energy, the Environment and Water

Our ref: DOC24/69853

Your ref: SSI 10040

Ken Holmes

Principle Environmental Auditor

Barnett & May

PO Box 365

BELROSE, NSW 2085

ken@baecka.com.au

Independent Environmental Audit – State Significant Infrastructure

Proposal: Project Energy Connect (Western Section)

Major Project reference: SSI 10040

Received: 13 January 2024

Dear Ken,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above State Significant Infrastructure. Thank you for the continued opportunity to comment on the project.

In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the requirements under AH3, AH4, AH5, AH6 and AH7 in the *Heritage Management Plan Energy Connect (NSW – Western Section)* prepared by Secure Energy. These requirements detail the need for further survey, test excavation, assessment, salvage, and exclusion zones prior to construction.

It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions regarding these comments, please contact Alison Lamond, Senior Assessments Officer, at Heritage NSW on 0419 762 918 or alison.lamond@environment.nsw.gov.au.

Yours sincerely

Nicole Davis

Nicole Davis

Manager Assessments

Heritage NSW

Department of Climate Change, Energy, the Environment and Water

As Delegate under National Parks and Wildlife Act 1974

12 February 2024

Lead Auditor CV

Appendix E

KEN HOLMES

Senior Principal Environmental Consultant



Contact

Email ken@baeckea.com.au

Mobile +61 0438 046 261

Qualifications & professional affiliations

- Bachelor of Science (Industrial Chemistry)
- Master of Applied Science (Waste Management)
- Master of Business Administration (MBA)
- Accredited Lead Environmental Auditor (Exemplar Global #: 14065)

Ken Holmes is an acknowledged industry leader in environmental management, impact assessment and project approvals. His career spans over 30 years and includes experience across Australia, Africa, Europe and South-east Asia.

Ken's extensive Environmental Audit, Infrastructure Planning and Approvals experience includes that preparation of environmental impact statements for major projects, pre-construction approvals, and operations environmental management experience.

He has led large scale projects on major road, rail, renewable energy, mining and water infrastructure projects across Australia. The projects presented below are a sample of the range and complexity of projects that Ken has delivered.

Project experience

Environmental Auditing (Audits completed in the recent years)

Project Energy Connect (2024 – 2025). Ken is currently undertaking the independent environmental audits of construction phase of this major (900km) electricity infrastructure project that consists of high voltage power line and associated infrastructure construction between Wagga Wagga and South Australia.

Hunter Power Project (Construction Phase IEA 2022 - 2025)- Ken has been commissioned to undertake the construction phase independent environmental audits on the Hunter Power Project. The Hunter Power Project is the construction of a new gas fired power station located in the Hunter Valley in NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Environment Protection Licence;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Kurri Kurri Lateral Pipeline Project (Construction Phase IEA 2023 - 2025)- Ken has been commissioned to undertake the construction phase independent environmental audits on this gas pipeline construction project. The Kurri Kurri pipeline Project is the construction of a new underground gas pipeline that will run from Beresford to the Hunter Power Project located in the Hunter Valley in NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Environment Protection Licence;

The independent environmental audits are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Dargues Gold Mine IEA (2023)- Ken led the independent environmental audit of environmental compliance audit of the this gold mining project located near Braidwood in southern NSW. The conditions of approval for the mine requires a two-yearly independent environmental audit of compliance against:

- o **DP&E Conditions of Approval / Development Approvals;**
- o **Water Licences;**
- o **Environment Protection Licences;**
- o **Mining Leases;**

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Mt Thorley / Warkworth Mine IEA (2023)- Ken led the independent environmental audit of environmental compliance audit of the this large mining complex located in the Hunter Valley, NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Commonwealth Approvals;
- o Water Licences;
- o Environment Protection Licences;
- o Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Hera Gold Mine (2019 and 2023)- Ken led the independent environmental audits for the environmental compliance audit of the Hera Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Commonwealth Approvals;
- o Water Licences;
- o Environment Protection Licences;
- o Mining Leases; and the
- o EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise

management.

Bingo Industries Eastern Creek Resource Recovery Facility and Landfill (2022) - Ken led the environmental compliance audit of Bingo's Resource Recovery Facility and Landfill located in western Sydney. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- o DP&E (NSW) Conditions of Approval / Development Approvals;
- o Environment Protection Licence.

The Audit also included an odour audit and surface water audits undertaken by specialists within the audit team.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

McArthur River Mine (Northern Territory) (2022) - Ken is currently leading the environmental compliance audit of McArthur River Mine in the Cape of Carpentaria, NT. EPBC Approval requires an annual independent environmental audit of compliance against that Approval.

The independent environmental audit is being undertaken in accordance with AS/NZS ISO 19011:2014 and the DAWE Audit Guidelines.

Moolarben Coal Mine (2022) - Ken led the environmental compliance audit of Moolarben Coal Mine located near Mudgee in Western NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- o EPBC Approval
- o DP&E (NSW) Conditions of Approval / Development Approvals;
- o Water Licences;
- o Environment Protection Licence; and all
- o Mining Leases.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Bingo Industries Mortdale Resource Recovery Facility (2022) - Ken undertook the environmental compliance audit of waste recycling plant and transfer station located in Mortdale, NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- o DP&E (NSW) Conditions of Approval / Development Approvals;
- o Environment Protection Licence.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

Victoria Cross Station Over Station Development (2023 – ongoing series of annual independent audits to 2025) - Ken is currently undertaking the environmental compliance audits of this landmark construction project in the North Sydney CBD. The conditions of project's Planning Approval requires six monthly independent environmental audits of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Martin Place Over Station Development (2020 – 2023) - Ken undertook the environmental compliance audits of this landmark construction project in the Sydney CBD. The conditions of project's Planning Approval required annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Client: Port Waratah Coal Loader (2018 and 2021)- Ken was the lead auditor for the last two independent environmental compliance audits of the Port Waratah Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the facility requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

These independent environmental audits were undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water, air quality and noise management.

North Parkes Mine (2021)- Ken was the lead auditor for the environmental compliance audit of the North Parkes Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Metropolitan Coal Mine (2018, 2021 and 2024)

Ken was the independent environmental auditor for the last three independent environmental compliance audits of the Metropolitan Coal Mine south of Sydney, NSW. These conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management (covering the mine infrastructure areas), air quality and noise management.

Stratford and Duralie Coal Mines – (2020) Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Ashton Coal Mine (2020) - Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Newcastle Coal Infrastructure Group (2019 and 2022) - Ken was the lead auditor for the environmental compliance audits of the NCIG Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Kables Sand Quarry EPBC Audit (2019) – Ken was the auditor for the EPBC audit of Hansons Kables Sand Quarry

located in the Blue Mountains in NSW. The audit was a requirement of the project EPBC approval and was undertaken in accordance with the DAWE Audit Guidelines.

Benedicts Recycling Mayfield (2019)- Ken was the lead auditor for the environmental compliance audit of the Benedicts waste facility in Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Triton Copper Mine (2018) - Ken was the lead auditor for the environmental compliance audit of the Triton Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Oberon Quarries (2019) - Ken was the lead auditor for the environmental compliance audit of this Gravel Quarry located in near Oberon in western NSW. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Sibelco Dunes Sand Mine (2018 / 2019) – Ken was the auditor for the environmental compliance audit of the Sibelco Sand located near Nelson Bay in NSW. The conditions of approval for the mine required an independent environmental audit of against:

- DP&E Conditions of Approval / Development Approvals;
- EIS predications against actual impacts.

The Approval required that the audit be conducted within 12 months of completion of mining and focussed on mine site rehabilitation.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

Ardglen Quarry (Daracon) (2018) - Ken was the lead

auditor for the environmental compliance audit of the Ardglen Gravel Quarry located in the upper Hunter Valley. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Holcim Hume Quarry (2017/8) - Ken was auditor for the environmental compliance audit of Holcim' hard rock quarry located near Queanbeyan in NSW. Ken undertook the compliance audits of the quarry's Conditions of Approval. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals
- Water Licences
- Environment Protection Licences.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

PGH Bricks (2017/8) - Ken was the lead auditor for the environmental compliance audits of PGH's NSW, QLD, Vic and SA quarries. Ken undertook the compliance audits of the quarries as required by the Conditions of Approval for each site. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals (for non-NSW sites)
- Mining (and Exploration) Leases
- Environment Protection Licences (or equivalent)

Enviroking (2017/8) - Ken was the lead auditor for an independent environmental audit undertaken in accordance with AS/NZS ISO 19011:2014 "Guidelines for auditing management systems" for the liquid waste facility. The audit reviewed Enviroking's compliance with conditions of approval, made recommendations to address non-compliances and identified opportunities for improvement in the project's environmental management and performance.

Ken has also undertaken compliance audits for a wide range of industries and projects including:

- Cowal Gold Mine
- Manildra Limited / Castlereagh Coal
- Bougainville Copper Limited (Bougainville, PNG)
- News Limited
- Fairfax News Papers
- Norske Skog
- Alcoa
- Ok Tedi Mining (PNG)
- Albright & Wilson
- Seafood Specialities
- Rio Tinto
- Hunter Water
- Department of Foreign Affairs and Trade

- Sydney Water
- Transport for NSW
- Mount Isa Mines
- Scott Transport
- Roads and Traffic Authority (now Roads and Maritime Services)
- AbiGroup (now LendLease)
- Leighton Contractors (now CPB Contractors)
- John Holland Group
- Queensland Transport
- PMP (Printing)
- Straits Resources
- Mount Isa Mines
- Philips (electronics)
- Bonlac Foods
- BHP

Ken has also led a wide range of Acquisition / Due Diligence audits for private sector clients in Australia, PNG, Africa, South Pacific, New Zealand, China, Singapore, Indonesia, Thailand.

Project Approvals

Central Station Re-development – Transport for NSW - Ken led the team responsible for gaining the environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Central Station project. In this role, Ken was responsible for the interpretation of the Approval requirements (Minister's Conditions of Approval) and the provision of strategic advice on the approvals, licencing, construction environmental management and stakeholder management.

Sydney Metro – Transport for NSW - Transport for NSW (TfNSW) commissioned two demolition contractors to demolish a number of multistorey buildings within the Sydney CBD in preparation for the construction of the Sydney Metro project. Ken led the team responsible for the preparation of environmental management plans for these works (TfNSW was not comfortable that the demolition contractors had the appropriate skills to prepare the required plans and gain the required approvals for the works). Ken worked with the demolition contractors to streamline their internal management processes and to add the requisite environmental management functions within both their corporate and project management systems.

M2 Widening Project Approvals (Roads and Maritime Services) – Ken (Project Manager) led the environmental approvals team for the preparation of the Environmental Impact Assessment and construction approvals (preparation of EMPs /construction licence etc.) for the M2 widening project.

The management and minimisation of vegetation clearing on this project (along with the minimisation of impacts on residents a high priority. Ken oversaw all the specialist studies that supported the preparation of the Environmental Impact Assessment and subsequent Environmental Management Plans, including:

- Ecological survey;
- Tree reports;
- Noise and vibration impact assessments;
- Contamination assessments;
- Traffic impact assessments; and
- Ground and surface water impact assessments.

Sydney Light Rail – Acciona / Transport for NSW - Ken led the team responsible for leading the construction approvals program and setting up the environmental management system for this significant brown fields infrastructure construction project. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Acciona management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Light Rail project. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal (Acciona / KMH) document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Ken also led the consultation with the NSW Government regulators and supported and mentored the Acciona Construction Environmental Manager. In addition, Ken personally led the community and business reference group consultation process on behalf of the design and construction joint venture, successfully gaining signoff from these consultation bodies on the environmental plans and strategies.

Environmental Management Representative (ER) - The role of Independent Environmental Representative on major infrastructure projects in NSW was established in 1998 and continues to be a requirement of the Conditions of Approval for all major infrastructure projects in NSW. The appointees are nominated by the project proponent or construction consortium but are approved by and report to the Director General of the Department of Planning and Environment (DPE).

- The scope of the ER's role is broad range and includes:
 - Interpreting and advising on requirements of the Project Approval.
 - Reviewing and assessing the performance of the project against the Conditions of Approval, Project Deed and other relevant project related approvals. In that role, the ER reviews and approves all environmental related plans (EMPs), audits the implementation of environmental management plans and strategies, verifies (through audit and surveillance) compliance with the relevant project approval and project deed requirements, monitors and reports on regulatory compliance and provides reports to the Department and the project proponent on these matters.

- Reports on compliance related issues to the public and investigates environmental and compliance issues, complaints and incidents.
- Review and approval of vegetation clearing and other high (environmentally) impact activities.

Ken has fulfilled the role of Independent Representative on seven major infrastructure projects:

- Hunter Expressway (Motorway construction, Hunter Valley) - (2011 – 2013)
- Integral Energy 9JA Project (Transmission Line Construction Western Sydney) - (2006-2007)
- Westlink M7 (40km Motorway project, Western Sydney) - (2003-2005)
- Towra Beach Nourishment Project (Wet land protection, dredging project, Botany Bay) - (2004)
- Warragamba Dam Auxiliary Spillway Project- (1998 – 2013)
- Cronulla Sewage Treatment Plant Upgrade – (1998 – 2000)
- Liverpool Sewage Treatment Plant Upgrade – (2000)

Upper Hunter Valley Alliance (UHVA) – Leighton Contractors /ARTC - Ken led the team responsible for the provision of the environmental approvals (preparation of EMPs /construction licences etc.) on this major ARTC rail infrastructure program in the Hunter Valley of New South Wales. Ken's team on this project provided the entire environment and community and stakeholder team as a Sub-Alliance partner. In this role, Ken provides strategic advice on the approvals, licencing, construction environmental management and stakeholder management. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Leighton management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for range of projects delivered by the Alliance. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Other relevant Infrastructure Projects led by Ken include:

- Joint Defence Headquarter Construction Project (ACT) – Environment Approvals Manager
- Melbourne Desalination Plant Project – EMP preparation
- Ballina Bypass (Pacific Highway construction project) - Environment Approvals Manager
- Northern Hume Alliance (Hume Highway Duplication) -

- Environment Approvals and Community Manager
- Anvil Hill Coal Mine (Hunter Valley) - Environment Approvals Manager
- Shannon Creek Dam Construction Project - Environment Approvals and Community Manager
- Liverpool to Ashfield Pipeline Project (Sydney Water) - Environmental Approvals Manager
- Networks Alliance (Sydney Water –water and sewage mains renewals project) – KMH Management Representative
- Technical Reviewer and Economic Impact Analyst – DEC Construction Noise Management Guidelines (2006)
- Northwest Transit Way - Environment Approvals Manager
- Lane Cove Tunnel - Environment Advisor to Approvals and Construction Team
- North Connex – Environmental Management Plan preparation, consistency assessments and preparation of Environmental Impact Assessments to support variations to the project approvals
- Sydney Desal Plant -Internal QA Reviewer
- Keepit Dam Safety Upgrade – Project Director
- Cordeaux Water Treatment Plant – Lead Consultant and Project Manager

Investigative / Expert Roles

Minter Ellison – Expert Opinion / Report (2018/9) - Ken was commissioned by Minter Ellison on behalf of their client (a consortium of major construction contractors) to provide an expert opinion regarding the interpretation of impact of changes to the Conditions of Approval for a major Sydney linear infrastructure project on environmental investigation and reporting obligations and project cost impacts. This expert opinion was commissioned to support the resolution of a contractual dispute between the consortium and their client.

Environment Protection Authority — Investigation of Illegal Land Clearing and Waste Disposal Activities (April 2015 – July 2017) - Ken was the lead auditor for the investigations undertaken by the KMH team commissioned by the NSW Environment Protection Authority (EPA) to investigate an alleged illegal vegetation clearing and waste disposal operations located in the Hunter Valley, Hawkesbury River Basin and Arcadia (north western Sydney). Ken developed and supervised the implementation site investigation strategies that included a series of investigative processes designed to identify the location and extent of vegetation clearing, and to determine the depth and volumes of buried construction and demolition wastes.

Environment Protection Authority — Expert Reports Illegal Land Clearing and Waste Disposal Activities (2018) - Ken was commissioned by the NSW Environment Protection Authority (EPA) to provide expert opinion regarding the alleged illegal vegetation clearing and waste disposal at a site in the Hawkesbury River Basin and Arcadia (north western

Sydney).

Ken was subsequently briefed to provide expert opinion in the legal actions taken by the EPA in these matters.

Qenos Mandatory Environmental Audit - Ken was commissioned as the Expert Independent Environmental Auditor (Lead Auditor) for the Qenos Mandatory Audit. As a result of a series of environmental incidents, Qenos were required by the NSW EPA to commission an independent auditor to determine if the plant is capable of being operated and maintained and if the plant is being competently operated and maintained, in order to minimise the risk of environmental incidents and better protect the environment.

In doing this, the audit Assessed the:

- adequacy of Risk Assessment procedures and practices
- adequacy of maintenance and operational Systems
- physical condition and reliability of the Plant
- adequacy and suitability of environmental risk management
- adequacy and suitability of performance monitoring equipment
- processes and procedures for identifying and rectifying plant and equipment issues.

Incidents and assessed of the adequacy the investigations and responses to those incidents.

Orica Port Botany Ground Water Remediation Project – Expert Auditor - Ken was the lead auditor for the independent compliance audit of the Orica groundwater remediation project. These annual audits were a condition of licence established by the (then) Department of Environment and Climate Change and the Department of Planning.

Other

Kelian Equatorial Mining (Kalimantan, Indonesia) - Ken led a specialist environmental and social impact audit team that was established by Rio Tinto (and approved by the Government) to investigate and report on the environmental and social impacts associated with alluvial mining operations (downstream) from the Rio Tinto (major owner) operated gold mine located in the remote, mountainous region of Kalimantan. The audit team included Government representatives and was undertaken to address the concerns

of local village communities that were being impacted socially and economically.

Bougainville Copper Limited (Bougainville, PNG) - Ken led two specialist projects for Bougainville Copper Limited. Including Investigation of the Loloho Port Facility on Bougainville Island. Ken led the investigation team commissioned to identify and plan for the clean-up of hazardous chemicals left after BCL evacuated Bougainville at the commencement of the civil war in 1990. The investigation covered gases, PCBs, and minerals processing chemicals. The second project was clean up and destruction of chlorine and other compressed gases located at the Loloho Port facility on Bougainville Island.

Ken subsequently led a team dispatched to Bougainville to chemically destroy 1 tonne of chlorine and other toxic gases. The team built a treatment plant on site and successfully removed the toxic gas threat.

Waste Management

Review of Energy to Waste Technologies – Client Confidential (Australian Based Waste Management Company)

Ken participated (as technical reviewer) in the preparation of a technical review of energy to waste technologies for a major waste management group operating in Australia. The purpose of the review was to provide the client with a detailed assessment of all available and emerging energy to waste technologies available including determining the barriers to implementation within the Australian market, political and social framework.

Shredder Waste Disposal Assessment – Sims Metal

Metal shredders produce a complex waste stream consisting of a mixture of plastic, rubber, metal and other materials that is costly to dispose of. Ken led the KMH team that researched the options for management of this waste stream and prepared recommendations for the development of waste treatment and disposal options (including energy extraction) for Sims Metal.