



APPENDIX 2

Updated Management and Mitigation Measures

Appendix 2 Updated Management and Mitigation Measures

Lightsource bp will be responsible for implementing the management and mitigation measures identified in the EIS. The management and mitigation measures will be implemented through a Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP). These plans will be prepared sequentially, prior to each stage of the Project by Lightsource bp and the relevant contractor, and in consultation with relevant Government Agencies.

The following table provides a consolidated list of the updated management and mitigation measures identified through the EIS applicable to the Project, including measures added as a result of the Response to Submission and Project review process, with the relevant timing for implementation.

Table A2.1 Consolidated Management/Mitigation Measures

Issue	Management and/or Monitoring Measure	Timing
General	Prepare and implement a Construction Environmental Management Plan (CEMP) for the Project, incorporating all relevant management and mitigation measures outlined in the EIS.	Prior to construction / Construction
	Prepare and implement an Operation Environmental Management Plan (OEMP) for the Project, incorporating all relevant management and mitigation measures outlined in the EIS.	Prior to operation / Operation
	Prepare and implement a Decommissioning and Rehabilitation Environmental Management Plan (DREMP) for the Project, incorporating all relevant management and mitigation measures outlined in the EIS.	Prior to decommissioning / Decommissioning
	Prepare and implement a variety of subplans for the CEMP and OEMP: <ul style="list-style-type: none"> • Social Impact Management Plan, including: <ul style="list-style-type: none"> ○ Accommodation, Employment and Procurement Strategy. ○ Community Engagement Strategy. ○ Community Shared Benefit Strategy. • Biodiversity Management Plan. • Sheep Grazing Vegetation Management Plan (if required). • Cultural Heritage Management Plan (including Aboriginal and non-Aboriginal Heritage). • Noise and Vibration Management Plan. • Soil and Water Management Plan, including Stormwater Management Plan. • Traffic Management Plan. 	Prior to construction / Construction / Operation

Issue	Management and/or Monitoring Measure	Timing
	<ul style="list-style-type: none"> • Waste Management Plan. • Emergency Plan, including Bushfire and Hazards. • Rehabilitation Management Plan. <p>Construction works will be primarily completed between standard construction hours in accordance with the <i>Interim Construction Noise Guideline</i> (DECC 2009), which are as follows:</p> <ul style="list-style-type: none"> • 7:00 am to 6:00 pm – Monday to Friday • 8:00 am to 1:00 pm – Saturdays • Sunday and Public Holidays – no work to be completed. <p>Exceptions to these hours will be limited to activities with low noise generation where practicable, emergency works or where required for deliveries or dispatches by an authority due to safety reasons. The Goulburn Mulwaree Council and affected landholders will be notified of any foreseeable exceptions.</p> <p>The approach to notification and consultation will be outlined in the Construction Environmental Management Plan (CEMP).</p>	<p>Construction</p>
Biodiversity	<p>Implement the following measures to minimise biodiversity impacts of the Project:</p> <ul style="list-style-type: none"> • Workforce education and training. • Implementation of vegetation protection zones for areas to be retained. • Ecologist pre-clearance surveys and supervision of works. • Erosion and sedimentation control measures. • Weed management. • Fencing, access control and fauna exclusion measures. <p>Salvage of biodiversity features, including habitat resources (e.g., hollow logs, tree hollows, fallen timber and rocks/boulders) and replacement of them in suitable locations in the landscape to augment existing habitat.</p> <p>A pre-clearing procedure will be implemented to minimise the potential for impacts on native fauna species (focusing on threatened species) as a result of the clearing of hollow-bearing trees. The pre-clearing procedure is designed to minimise impacts to hollow-dependent and ground-dwelling fauna.</p> <p>Pre-clearance surveys and tree-felling supervision recommendations will be implemented to minimise the potential for impacts on native fauna species (including threatened species) as a result of the clearing of hollow-bearing trees.</p>	<p>Prior to construction / Construction / Operation</p> <p>Construction</p> <p>Prior to construction</p> <p>Prior to construction</p>

Issue	Management and/or Monitoring Measure	Timing
	During construction, temporary exclusion fencing will be used to demarcate vegetation where required to avoid accidental damage to areas outside of the disturbance area.	Construction
	With regards to the potential for white-fronted chat (<i>Epthianura albifrons</i>), the following measures will be implemented: <ul style="list-style-type: none"> • Staged removal of thistles to occur in non-breeding season (outside of September). • Replanting native vegetation (e.g., <i>Poa</i> spp. tussocks) near the water along Gundry Creek or Bullamalito Creek. 	Construction
	The following mitigation actions will be implemented for the Project to develop a greater understanding and awareness of biodiversity issues in non-ecological trained personnel: <ul style="list-style-type: none"> • Inductions for the workforce will be undertaken to make them aware of the key ecological issues present within the Project Area and so that they know their role and responsibilities in the protection and/or minimisation of impacts to all native biodiversity. • Inductions will identify the location of sensitive flora and fauna and the policies being implemented to protect the biodiversity values of such areas. 	Construction
	Weed management controls will include: <ul style="list-style-type: none"> • Survey and treatment of invasive weed species prior to the disturbance of topsoil to prevent an outbreak and / or the spread of species to previously unaffected areas. • Ongoing environmental inspections and treatment of outbreaks of invasive weed species as required during the construction and operation of the Project. • Machinery and equipment will be cleaned thoroughly prior to entering the Project Area. Cleaning must include the removal of all mud and plant matter, followed by washing with high pressure water. • Mulch containing weeds will be placed in piles separate from clean mulch, removed from site, and disposed of in accordance with weed management guidelines as soon as practicable. 	Construction / Operation
	Access control is an important feature in protecting and demarcating areas outside the disturbance area from vehicle access, human access, and accidental disturbance. Measures include: <ul style="list-style-type: none"> • Appropriate fencing and signposting of areas to prevent the uncontrolled entry of people, accidental disturbance and to minimise vehicular and human traffic. • Clear and visible signage is to be appropriately located to inform the workforce and others of the restricted access or otherwise of areas outside the Project Area. • Locking of gates to prevent unwanted vehicle, person access and disturbance. 	Construction / Operation
	General fencing will be non-inhibiting fauna fencing (excludes security fencing).	Construction / Operation

Issue	Management and/or Monitoring Measure	Timing																												
	<p>The Biodiversity Management Plan (BMP) will include strategies for habitat restoration along the stream banks of Gundry Creek and or Bullamalito Creek. The BMP will address the specific planting processes with the broad vision of recreating effective plant communities that are generally consistent with recognised and locally occurring PCTs and giving consideration to relevant VI condition benchmarks.</p>	<p>Prior to construction / Construction / Operation</p>																												
<p>Aboriginal Cultural Heritage</p>	<p>An Aboriginal Cultural Heritage Management Plan (ACHMP) for the Project will be developed in consultation with the registered Aboriginal parties (RAPs) and Heritage NSW, including:</p> <ul style="list-style-type: none"> • Protecting the Aboriginal archaeological sites and areas of archaeological potential identified in Table 1 including establishing appropriate fencing/site demarcation prior to the commencement of construction and ensuring ongoing protection during construction and operation. • Managing impacts to sites identified in Table 1. This will include the provision of methodologies for surface collection and for fencing/site demarcation. • Protocols to be followed in the instance that additional ground disturbance works are required outside the assessed areas. This will include requirements for further survey and assessment of any such works. • The management of any new Aboriginal archaeological sites (Unexpected Finds Protocol) that may be identified during these inspections or over the course of construction or operational activities. • The management of Aboriginal skeletal remains should any be identified within the construction or operational activities for the Project. • Monitoring and reporting on the effectiveness of these measures and to report on the outcomes of any approved mitigation works. • Providing Aboriginal cultural heritage awareness training to all staff and contractors working on the Project, including the requirement to avoid impacts to specified sites. <p>Table 1 Recommendations by Site/Area of Archaeological Potential</p> <table border="1" data-bbox="421 1074 1756 1358"> <thead> <tr> <th data-bbox="421 1074 636 1153">Site Name</th> <th data-bbox="636 1074 893 1153">Site Type</th> <th data-bbox="893 1074 1093 1153">Management Strategy</th> <th data-bbox="1093 1074 1756 1153">Requirement</th> </tr> </thead> <tbody> <tr> <td data-bbox="421 1153 636 1182">GSF-UMW-1</td> <td data-bbox="636 1153 893 1182">Open artefact site</td> <td data-bbox="893 1153 1093 1182">Collection</td> <td data-bbox="1093 1153 1756 1182">Collection to be undertaken by qualified archaeologists and RAP representatives in accordance with the methodology outlined in Section 8.1.1 of the ACHA.</td> </tr> <tr> <td data-bbox="421 1182 636 1211">GSF-UMW-2</td> <td data-bbox="636 1182 893 1211"></td> <td data-bbox="893 1182 1093 1211"></td> <td data-bbox="1093 1182 1756 1211"></td> </tr> <tr> <td data-bbox="421 1211 636 1240">GSF-UMW-7</td> <td data-bbox="636 1211 893 1240"></td> <td data-bbox="893 1211 1093 1240"></td> <td data-bbox="1093 1211 1756 1240"></td> </tr> <tr> <td data-bbox="421 1240 636 1268">GSF-UMW-10</td> <td data-bbox="636 1240 893 1268"></td> <td data-bbox="893 1240 1093 1268"></td> <td data-bbox="1093 1240 1756 1268"></td> </tr> <tr> <td data-bbox="421 1268 636 1297">GSF-UMW-11</td> <td data-bbox="636 1268 893 1297"></td> <td data-bbox="893 1268 1093 1297"></td> <td data-bbox="1093 1268 1756 1297"></td> </tr> <tr> <td data-bbox="421 1297 636 1358">GSF-UMW-16</td> <td data-bbox="636 1297 893 1358"></td> <td data-bbox="893 1297 1093 1358"></td> <td data-bbox="1093 1297 1756 1358"></td> </tr> </tbody> </table>	Site Name	Site Type	Management Strategy	Requirement	GSF-UMW-1	Open artefact site	Collection	Collection to be undertaken by qualified archaeologists and RAP representatives in accordance with the methodology outlined in Section 8.1.1 of the ACHA.	GSF-UMW-2				GSF-UMW-7				GSF-UMW-10				GSF-UMW-11				GSF-UMW-16				<p>Prior to and during construction</p>
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Issue	Management and/or Monitoring Measure				Timing
	GSF-UMW-3 GSF-UMW-4 GSF-UMW-5	Open artefact site	Avoidance	To be fenced off prior to construction commencing	
	GSF-UMW-6 GSF-UMW-9	Open artefact site with deposit and PAD	Collection and Staged Salvage	Staged salvage excavation to occur prior to the construction in accordance with the methodology outlined in Section 8.1.1 of the ACHA.	
	GSF-UMW-8 GSF-UMW-12 GSF-UMW-13 GSF-UMW-14 GSF-UMW-15	Open artefact site with deposit and PAD	Collection	Collection to be undertaken by qualified archaeologists and RAP representatives in accordance with the methodology outlined in Section 8.1.1 of the ACHA.	
Historical Heritage	An unexpected heritage finds protocol will be developed and included in the environmental management policies for the Project. This will include identification of contact persons within the Proponent team as well clearly identified steps to be implemented.				Prior to construction / Construction/ Operation
	All project team members and construction contractors will undertake a heritage-specific induction to support the use of the unexpected heritage finds protocol.				Prior to construction / Construction / Operation
	In the unlikely event that unexpected historical archaeological material is discovered, all work in the area will cease and suitably qualified archaeologist will be consulted to determine an appropriate course of action. Depending on the extent and significance of the archaeological remains encountered, additional assessment and investigations, and consultation with Heritage NSW may be require prior to the re-commencement of works.				Construction / Operation
Land Resources and Land Use	The CEMP will be developed and implemented for the construction phase of the Project and will include relevant erosion and sediment control measures, in accordance with the <i>Managing Urban Stormwater: Soils and Construction Volume 1</i> (NSW DPIE, 2004) "The Blue Book".				Prior to construction / Construction
	An Erosion and Sediment Control Plan (ESCP) will be developed as part of the CEMP in consideration of the dispersive soils identified within the Project Area will be considered.				Prior to construction / Construction
	If sheep grazing is implemented, the OEMP will incorporate a Sheep Grazing Vegetation Management Plan (SGVMP) to be developed in consultation with DPIRD Agriculture and the host landholder. The SGVMP will outline measures for solar grazing in line with the Agrisolar Guide 2021 and other animal and welfare standards and guidelines.				Prior to operation / Operation

Issue	Management and/or Monitoring Measure	Timing
	<p>This will include measures to:</p> <ul style="list-style-type: none"> • Manage the stock appropriately, including a requirement to keep the stock in good health, ensuring frequent shearing (to keep wool growth low). • Ensure mustering is conducted in an agreed safe manner. • Any fatalities are managed by the farmer. • Aim to achieve a minimum target of 70% groundcover, although this may be difficult to achieve under certain seasonal conditions such as a dry or low rainfall period. • Manage stocking rates during dry or low rainfall periods. 	
	<p>The OEMP will detail requirements to manage the spread of weeds, pests and biosecurity risks, including erosion, soil fertility and compaction during the operation of the Project.</p>	<p>Prior to operation / Operation</p>
	<p>The Project Area will be rehabilitated to a condition as close as practicable to the condition that existed prior to construction of the Project and in consultation with the landowner. This will be achieved through the implementation of a Rehabilitation Management Plan as part of the OEMP for the Project.</p>	<p>Prior to decommissioning</p>
Landscape and Visual	<p>The draft landscape plan will be finalised and implemented subsequent to Project approval and finalisation of the Project layout. The detailed landscape plan will include the intended planting strategy and location for planting and will be consistent with the native vegetation found around and close to the Project Area.</p>	<p>Prior to construction / Construction</p>
	<p>A maintenance plan for proposed landscaping will be prepared and implemented in conjunction with the landscape plan. This will include:</p> <ul style="list-style-type: none"> • defined initial establishment period (minimum of 12 months) • schedule for monitoring planting areas and watering during the establishment period • ongoing maintenance practices during and post establishment (such as a weeding/mulching regime) • guidance for replacement planting (for plants that fail to thrive). 	<p>Prior to construction / Construction / Operation</p>
	<p>Lighting will be installed in accordance with <i>AS4228-1997 – Control of Obtrusive Effects of Outdoor Lighting</i>. During construction appropriate mitigation will be applied to lighting (including directional lighting and light shields) to reduce any associated impact.</p>	<p>Prior to construction / Construction / Operation</p>
	<p>Ancillary components of the Project, such as the inverter shelters and office/storage containers, will be colour treated so they are dark in colour and less prominent.</p>	<p>Construction / Operation</p>

Issue	Management and/or Monitoring Measure	Timing
Glint and Glare	Establishment and maintenance of landscape screening along the north-eastern boundary of the Project as proposed in the conceptual layout.	Prior to construction / Construction / Operation
Noise and Vibration	Suitable noise attention (such as noise barriers) will be established around the Project infrastructure consistent with those nominated in Section 5.3 of the NVIA.	Prior to Operation / Operation
	The draft Noise and Vibration Management Plan (NVMP) will be reviewed and updated prior to the commencement of construction. The NVMP will be implemented as part of the CEMP.	Prior to construction / Construction
	The CEMP and NVMP will be regularly updated to account for any changes in noise and vibration management of the Project.	Prior to construction / Construction
	The noise levels of plant and equipment will have operating Sound Power or Sound Pressure Levels consistent with those nominated in the NVIA.	Construction / Operation
	Non-tonal reversing beepers will be fitted and used on all construction vehicles and mobile plant used regularly on site and for any out of hours work.	Construction
	All sensitive receivers likely to be affected will be notified at least seven days prior to commencement of any works associated with the activity that may have an adverse noise or vibration impact.	Prior to construction / Construction
	All employees, contractors and subcontractors will receive an environmental induction. The induction will include at a minimum, all applicable mitigation measures, hours of work, any limitations on high noise-generating activities, location of nearest sensitive receivers, designated parking areas, relevant approval conditions and incident procedures.	Prior to construction / Construction / Operation
	Construction will be carried out during the standard daytime working hours. Work generating high levels of noise will be scheduled during less sensitive time periods.	Construction
<p>Vibration generating plant not listed in Table 6.3 of the NIVA will not be used within the identified safe working distances. If vibratory rollers or other vibration inducing construction sources are required within the safe working distances for residential nominated in Table 6.3, the following will be undertaken:</p> <ul style="list-style-type: none"> • An independent specific structural assessment is undertaken on the structure to ascertain the structural integrity and its ability to withstand vibration, and establishment of an appropriate vibration criterion. • A dilapidation survey is undertaken on the structure prior to works commencing, and regular inspection of the structure throughout the construction activities. • Pre-construction vibration monitoring to establish baseline vibration impacts induced on the structure from road traffic. 	Construction	

Issue	Management and/or Monitoring Measure	Timing
	<ul style="list-style-type: none"> Where appropriate, continuous vibration monitoring is conducted on the structure for the duration of the period of construction while vibration generating equipment is used. The vibration logger will be equipped with the facility to remotely alert the site to reduce or cease construction activities if vibration levels are approaching the criterion threshold. Stationary noise sources will be enclosed or shielded where feasible or reasonable. 	
Traffic and Transport	Intersection works will be undertaken on Windellama Road to upgrade the Project access to accommodate heavy vehicle access. The upgraded intersection will provide an auxiliary and/or protected (channelised) turn lane intersection treatment to accommodate the swept path turning movement by the largest types of trucks (19 m semi-trailers) requiring access to the Project Area.	Prior to construction
	No Project related construction traffic (heavy) will utilise Option 1 during school zone hours of operation (8:00 am–9:30 am and 2:30 pm–4:00 pm on school days).	During construction
	Lightsource bp will use Option 2 as the preferred transport route should the peak construction periods for Gundry Solar Farm and Merino Solar Farm overlap to manage and mitigate any potential cumulative traffic impacts.	During construction
	A Construction Traffic Management Plan (CTMP) will be prepared and implemented in accordance with relevant guidelines and in consultation with TfNSW, Goulburn Mulwaree Council and any other relevant stakeholders. The CTMP will outline how construction activities will avoid, mitigate and manage risks involving construction activities, users of the traffic and transport network and residents.	Prior to and during construction
	A detailed OSOM route assessment will be undertaken by the construction contractor and detailed in a CTMP when OSOM vehicle dimensions and loadings are confirmed to determine traffic management requirements.	Prior to and during construction
	OSOM vehicles will secure the required permits from the National Heavy Vehicle Regulator (NHVR), effectively replacing approvals that were previously granted by TfNSW and councils. Applications will be submitted to the NHVR.	Prior and during to construction
	Temporary road closures for OSOM movements will be avoided during peak school times. Vehicle layovers will be identified to allow vehicles to wait until appropriate times for travel.	Construction
	Dilapidation surveys covering pavement, drainage, and bridge structures will be undertaken in consultation with TfNSW and local Councils for the proposed transport routes before and after construction. Regular inspections and consultation with local Councils and proponents will be undertaken. Any damage resulting from construction traffic, excluding normal wear and tear, will be repaired.	Construction / Operation
	Lightsource bp will institute a program designed to educate site workers about safe driving and will implement a driver's code of conduct.	All phases of Project

Issue	Management and/or Monitoring Measure	Timing
Water Resources	Project infrastructure, such as inverters, battery stations and solar panels, will be designed to provide a minimum of 300 mm freeboard for the lowest edge above the maximum 1% AEP flood level.	Prior to construction
	Inspection after storm events will be undertaken to identify areas of erosion above expected background levels (i.e. eroding gullies and along internal access tracks) and address these.	During construction / Operation
	Further flood investigations will be carried out where required during detailed design to confirm the flood immunity objectives and design criteria for the Project are met.	Prior to construction
	Foundations for Project infrastructure will be located away from areas that exceed both flood depths of 0.3 m and flow velocities greater than 1.5 m/s.	Prior to Construction / Construction/ Operation
	No sensitive infrastructure (such as battery stations, inverters, substation, etc.) will be placed within 20 m of any Strahler 3 or above order streams.	Prior to Construction / Construction/ Operation
	All waterway crossings will be designed and constructed in compliance with DPI Water Guidelines, including: <ul style="list-style-type: none"> • <i>Guidelines for controlled activities on waterfront land – riparian corridors</i> (NSW 2018). • <i>Guidelines for watercourse crossings on waterfront land</i> (NSW, Office of Water). • <i>Guidelines for laying pipes and cables in watercourses on waterfront land</i> (NSW, 2012). 	Prior to construction
	A Soil and Water Management Plan (SWMP) will be prepared for the construction and operational phase of the Project in consultation with WaterNSW. The SWMP will include measures to specifically address, but not be limited to: <ul style="list-style-type: none"> • the high erosion risk based on dispersive subsoils across the site including diversion of runoff around the site, and adequate measures to stabilise drip lines below the solar panels to reduce any erosion risks and subsoil waterlogging from panels • vegetation clearing and measures to avoid and/or mitigate impacts to riparian zones and wetland vegetation, and • design details of any existing erosion control measures (including Catchment Protection Scheme (CPS) works), and any other constraints such as existing erosion gullies and the location of sodic and saline soils. This will also include potential impacts to existing CPS works or gullies due from the proposal and possible mitigation measures, particularly over Gundry Creek and Bullamalito Creek. 	Prior to construction / Construction / Operation
	A Stormwater Management Plan for the construction and operational phases of the Project will be prepared in consultation with Water NSW, including: <ul style="list-style-type: none"> • details of how potential water quality impacts will be avoided and/or minimised through project design, and route and site selections for the hardstand areas (including that required during the construction phase) 	Prior to construction / Construction / Operation

Issue	Management and/or Monitoring Measure	Timing
	<ul style="list-style-type: none"> • details of the site layout including water quality design measures to treat stormwater runoff from the proposed impervious areas such as solar panels, building roofs, internal access tracks and hardstand areas (Substation and Battery Energy Storage System – either centralised or decentralised final location/s), including suitable alternative measures to the bioretention basin • details of measures to limit infiltration of water into highly erodible subsoils, including drippage and runoff from solar panels • updated MUSIC stormwater quality modelling, to be refined as part of detailed design, showing a comparison of pre- and post-development scenarios on water quality parameters of key concern (Total Suspended Solids, Total Phosphorus and Total Nitrogen) • concept design plans for any stormwater quality treatment measures and required watercourse crossings (both temporary and permanent) including detailed cross sections. 	
	Fencing will be designed to consider flood levels across the site through installation of riparian fencing, consisting of a flood permeable configuration (such as a latched tube watercourse crossing), at each watercourse crossing to reduce the likelihood of fence blockage due to loss of vegetation in storm events.	Prior to construction
	Debris will be cleared from fencing following flood events.	Construction / Operation
	At the detailed design phase, further water quality modelling will be undertaken to inform Project design with respect to required stormwater treatment measures to ensure stormwater discharging from the Project Area post-development is acceptable for discharge to the Sydney Drinking Water Catchment.	Prior to construction
	An OEMP will be developed for the Project to address potentially adverse impacts on the receiving environment surface water quality during the operational phase. The OEMP will also outline and define design details, operation, monitoring, and maintenance of the proposed wastewater pumpout system, stormwater treatment measures and erosion and sediment controls for the Project, including the installed panels. The OEMP will include measures to manage any bare areas and erosion that develop beneath the solar arrays over time during ongoing operations and will incorporate water quality monitoring of receiving waters.	Prior to operation / Operation
	Water sources will be confirmed during the detailed design phase and in consultation with suppliers and landholders and be subject to availability. A water sourcing strategy will be developed so that water used during the construction phase does not cause issues to adjacent landowners or other stakeholders. The use of any bore water during construction and decommissioning will be agreed with the landholder and Water Access Licences (WAL) will need to be confirmed and/or obtained.	Prior to construction / Construction / Operation
	Post-construction, disturbed areas will be stabilised by the establishment and maintenance of a vegetated ground cover consisting of low-growing grasses.	Construction/ Operation

Issue	Management and/or Monitoring Measure	Timing
	Should the final Project design identify that construction activities will result in the interception of the groundwater table, further assessment will be undertaken in accordance with the NSW <i>Aquifer Interference Policy</i> and appropriate management measures be developed to mitigate any potential impacts.	Prior to construction / Construction
Battery Hazards	Lightsource bp will implement a range of technical and non-technical risk mitigation and management measures including rigorous design standards and maintenance practices. Compliance with HIPAP 4 criteria is conditional on these technical and non-technical risk mitigation and management measures being implemented.	Prior to construction
	A Fire Safety Study (FSS) will be developed prior to construction. The FSS will be used to inform the design and as such it is FRNSW Position that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). The FSS will be prepared consistent with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations.	Prior to construction
	Prior to operation, an Emergency Plan (EP) and detailed emergency procedures consistent with HIPAP 1 and the RFS Planning for Bushfire Protection (or equivalent) will be developed in consultation with RFS and FRNSW. The EP will be implemented.	Prior to operation / Operation
	Prior to operation, an Emergency Services Information Package (ESIP) will be developed for the Project in accordance with FRNSW fire safety guideline – <i>Emergency services information package and tactical fire plans</i> .	Prior to operation / Operation
	Prior to operation, an emergency responder’s induction package will be developed for the Project in consultation with, and to the satisfaction of FRNSW. The package will inform first responders of site-specific features and safety measures to ensure they are able to undertake their duties effectively. The format of the induction package will be such that it can be readily shared across all agencies.	Prior to operation / Operation
Bushfire	<p>The Project design will include:</p> <ul style="list-style-type: none"> • 10 m trafficable defensible space (APZ) around the perimeter of the Project Area that permits unobstructed vehicle access, in accordance with Appendix 4 of Planning for Bush Fire Protection 2019 • dedicated non-combustible water tanks with up to 180,000 L capacity • supplementary site access via Kooringaroo Road for emergency access only, including up to 10 additional emergency access points along the security fence • access tracks on the Project Area to be designed as to provide safe access for emergency services personnel. 	Prior to construction / Construction / Operation
	Appropriate signage is to be provided to enable safe and efficient navigation for firefighters.	Construction / Operation

Issue	Management and/or Monitoring Measure	Timing
	<p>A Fire Management Plan (FMP) will be developed and implemented for the Project in accordance with PBP 2019 and in consultation with DPHI Hazards, NSW RFS Goulburn River Control Centre and FRNSW. The FMP will include, at a minimum:</p> <ul style="list-style-type: none"> • 24 hour emergency contact details including alternative telephone contact. • Site infrastructure plan. • Firefighting water supply plan. • Site access and internal road plan. • Mapping to show Asset Protection Zones (APZ). • Location of hazards (Physical, Chemical and Electrical) that may impact on firefighting operations and procedures to manage/mitigate identified hazards during firefighting operations. • Such additional matters as required by the NSW RFS District Office. 	<p>Prior to construction / Construction / Operation</p>
	<p>Bushfire training day with the RFS once the Project is commissioned.</p>	<p>Prior to operation</p>
	<p>Notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate.</p>	<p>Prior to construction / Construction / Operation</p>
EMF	<p>All project infrastructure will be designed in accordance with relevant industry standards.</p>	<p>Prior to construction</p>
	<p>All relevant procedures in relation to a high voltage installation will be adhered to throughout the life of the Project.</p>	<p>All phases of the Project</p>
	<p>Public access will be restricted throughout the life of the Project.</p>	<p>All phases of the Project</p>
Social Impacts	<p>A Social Impact Management Plan (SIMP) will be developed and implemented for the Project to manage and enhance social impacts through each stage of the Project.</p>	<p>Prior to construction / Construction / Operation</p>
	<p>The Community and Stakeholder Engagement Plan (CSEP) will be reviewed and updated to include consistent, transparent and proactive information provision and consultation with stakeholders throughout Project development.</p>	<p>Prior to construction</p>
	<p>Lightsource bp will continue to implement the CSEP throughout the construction and operation of the Project, with regular evaluation to ensure it continues to meet its objectives. Consideration will be given to ongoing communication with host and proximal landholders and additional methods for enhancing community and connection within the locality, including the identification of new relevant stakeholders as the Project progresses.</p>	<p>Construction / Operation</p>
	<p>The proposed Neighbourhood Benefit Sharing Program will be implemented should the Project be approved, and construction commences.</p>	<p>Prior to construction / Construction</p>

Issue	Management and/or Monitoring Measure	Timing
	<p>Lightsource bp will monitor and evaluate the effectiveness of the Accommodation and Employment Strategy (AES) and implement the strategy. During the Project's pre-construction and construction phases, the AES will be reviewed bi-annually by the EPC Contractor to assess the effectiveness of steps taken to secure sufficient accommodation for the workforce.</p>	<p>Prior to construction / Construction</p>
Economic	<p>The AES for the Project will be reviewed and updated to confirm:</p> <ul style="list-style-type: none"> • There is sufficient accommodation for the workforce associated with the construction phase of the Project. • Measures to addresses any specific cumulative impacts arising associated with other State significant development projects in the Study Area. • Measures to prioritise the employment of local workers and the procurement of local businesses for the construction and operation of the Project. • A program to monitor and review the effectiveness of the Strategy over the life of the Project, including regular monitoring and review during the construction phase. 	<p>Prior to construction</p>
Waste	<p>The draft Waste Management Plan (WMP) will be reviewed and updated. Where possible, waste generated by the Project will be reused and recycled in accordance with the waste management hierarchy. Lightsource bp will continue to consult with Council regarding waste management.</p>	<p>Prior to construction / Construction</p>
	<p>Management of wastes generated during the operational phase of the Project will occur through a Waste Management Plan as part of the OEMP.</p>	<p>Operation</p>
	<p>A Decommissioning and Rehabilitation Management Framework (DRMF) will be developed for the Project. The Framework will demonstrate a commitment to ensuring appropriate environmental management is undertaken during the decommissioning and rehabilitation phase of the Project in accordance with legislative requirements, conditions of consent, stakeholder interest and industry best practice.</p>	<p>Prior to decommissioning</p>
Air Quality	<p>As part of the CEMP, protocols will be developed and implemented to minimise the air emissions during the construction, including:</p> <ul style="list-style-type: none"> • Water suppression on all exposed areas, unsealed roads and stockpile area when required (i.e. if visible dust emissions are observed). • The location and scale of dust generating activities will be modified and limited during periods of dry and windy weather. • Engines to switch off when not in use for prolonged periods. • Development of a complaints procedure to identify and respond to complaints. 	<p>During construction</p>

Issue	Management and/or Monitoring Measure	Timing
	Areas within the Project Area which have been temporarily disturbed by construction and operational activities will be rehabilitated.	Construction / Operation
	Once construction has been completed, establish, and maintain ground cover in accordance with the OEMP.	During operation