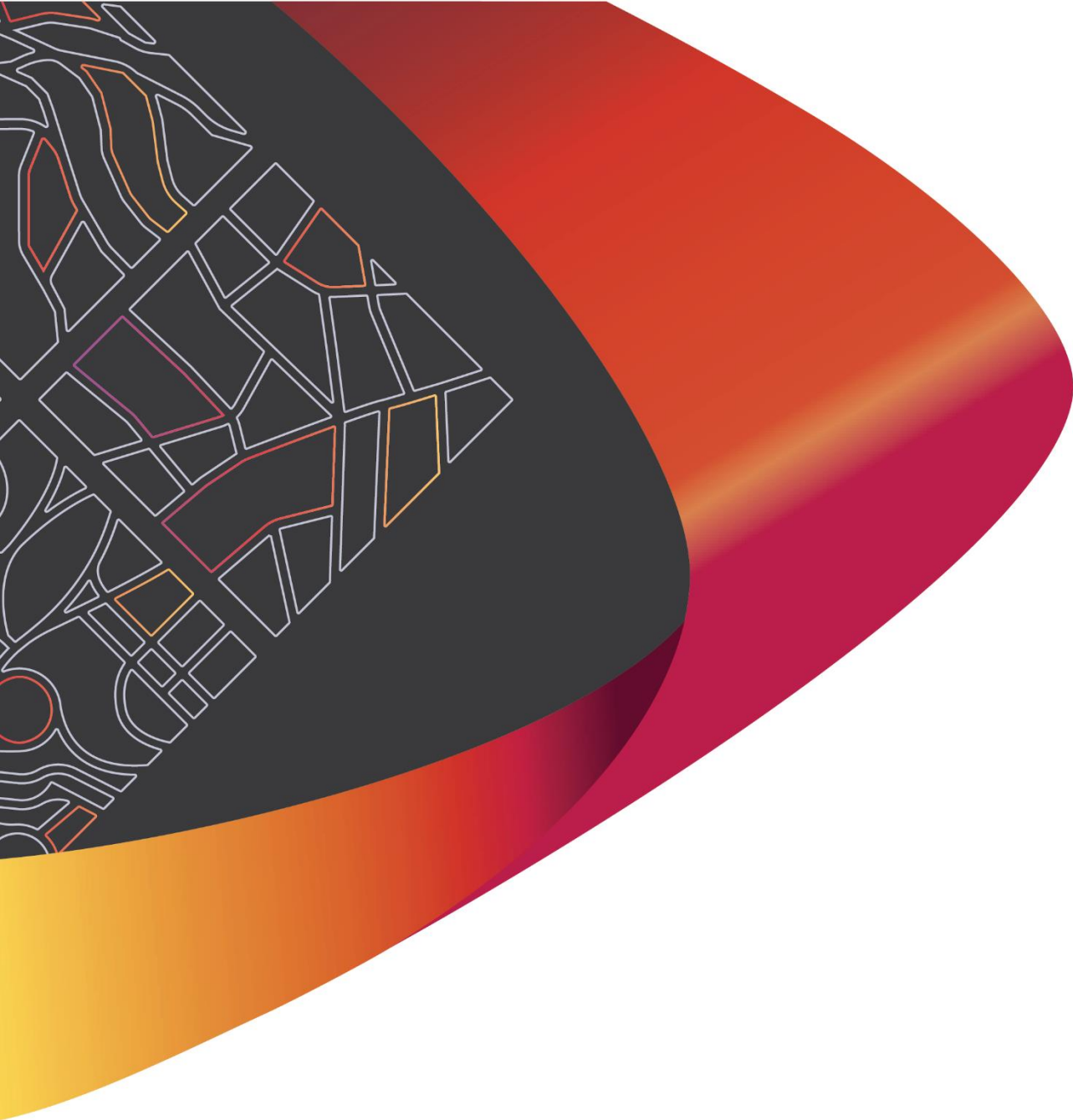




SUBMISSIONS REPORT
Finely Battery Energy Storage System
BESS Pacific Pty Ltd

P001993 RTS R01

Rev: B

5 February 2026



Premise

PART OF THE
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ABBREVIATIONS

Abbreviation	Abbreviated term
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACH	Aboriginal Cultural Heritage
AHIMS	Aboriginal Heritage Information Management System
AIA	Agricultural Impact Assessment
ANL	Acceptable Noise Levels
BAR	Bushfire Assessment Report
BESS	Battery Energy Storage System
BDAR	Biodiversity Development Assessment Report
BLEP	Berrigan Local Environmental Plan 2013
BOM	Bureau of Meteorology
BSAL	Biophysical Strategic Agricultural Land
CCTV	Closed Circuit Television
CEMP	Construction Environmental Management Plan
CFP	Chance Finds Protocol
CSES	Community and Stakeholder Engagement Strategy
DA	Development Application
DCP	Development Control Plan
DNG	Derived Native Grassland
DoE	Commonwealth Department of Environment
DPE	NSW Department of Planning and Environment
DPI	NSW Department of Primary Industries
DPHI	NSW Department of Planning, Housing and Infrastructure
EEC	Endangered Ecological Community
EIS	Environmental Impact Statement
ENM	Excavated Natural Material
EOR	Engagement Outcomes Report
EPA	NSW Environment Protection Authority
ESD	Ecologically Sustainable Development
FRGA	Flood Risk and Groundwater Assessment
FRNSW	Fire and Rescue New South Wales
ICNG	Interim Construction Noise Guideline (2009)
INP	Noise Policy for Industry 2017

Abbreviation	Abbreviated term
LEP	Local Environmental Plan
LGA	Local Government Area
LPI	NSW Land and Property Information
LUCRA	Land Use Conflict Risk Assessment
NIA	Noise Impact Assessment
OEH	NSW Office Environment and Heritage
OSOM	Over Size Over Mass
PBP 2019	Planning for Bush Fire Protection 2019
PHA	Preliminary Hazards Analysis
RFS	NSW Rural Fire Service
RMS	NSW Roads and Maritime Service
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SSD	State Significant Development
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
VIA	Visual Impact Assessment
Units of measure	
°C	degrees Celsius
dB(A)	A-weighted decibel
Ha	Hectare
m	Metres
m/s	Metres per second
ML	Megalitre
MW	Megawatt
MWAC	Megawatt alternating current
MWh	Megawatt hour

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EXECUTIVE SUMMARY

Background

BESS Pacific Pty Ltd seeks to develop a 100 Megawatt AC (MW_{AC})/ 200 Megawatt Hour (MWh) Battery Energy Storage System (BESS) at Riverina Highway, Finley NSW 2713 being Lot 3 DP740920; within the Berrigan Shire Local Government Area (LGA). Ancillary aspects of the project include:

- > Substation augmentation works - 168 Canalla Road, Finley being Lot B DP961693; and
- > Underground transmission cables within the Broockmanns/Canalla Road reserves and Mulwala No. 19 irrigation channel.

As described in the Environmental Impact Statement (EIS), the original development site comprised of approximately 10.45 hectares (ha). Following public exhibition and consultation with Transport for NSW (TfNSW), the development site (red line boundary) is now amended to 12.28 ha. As documented in the concurrent Amendment Report, the increase to the development site area consists of 1.83 ha for the inclusion of the intersection upgrades at the Riverina Highway/Canalla Road/Marantellis Road intersection. No changes are proposed to the layout or scope of works within the original 10.45 ha.

The project represents State Significant Development (SSD) by reference to Section 20 of Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) on the basis that the estimated development cost for the project will exceed \$30 million.

The Environmental Impact Statement (EIS) to support the Finley BESS development application (DA) was prepared by Premise to respond to the Secretary's Environmental Assessment Requirements (SEARs) dated 18 July 2024. The EIS was placed on exhibition between the 30 May 2025 and 27 June 2025.

During this period, a total of 66 submissions by way of objection were received, being:

- > 59 submissions in objection from members of the public; and
- > 7 submissions in objection from community groups.

In addition, the following submissions were also received:

- > 13 comments from a regulatory agencies, including Berrigan Shire Council;
- > 1 submission making comment from members of the public; and
- > 1 submission making comment from community groups.

Analysis of the geographic distribution of public submissions indicates that the minority of objections were lodged from within the immediate locality of the proposed Finley BESS, with the larger proportion originating from outside the local and regional area.

Of the total 66 public objections received:

- > Zero submissions were received from within 5 kms of the development site;
- > Zero submissions were received from the broader Berrigan regional area (5–100 kilometres); and
- > 66 submissions were lodged from locations greater than 100 kms from Finley, reflecting a broader interest in the project beyond the local and regional context.

More than 98% of submissions were received from members of the public and community interest groups located more than 100 km from the project site. This indicates that the substantial proportion of submissions were received from outside the immediate local and regional area.

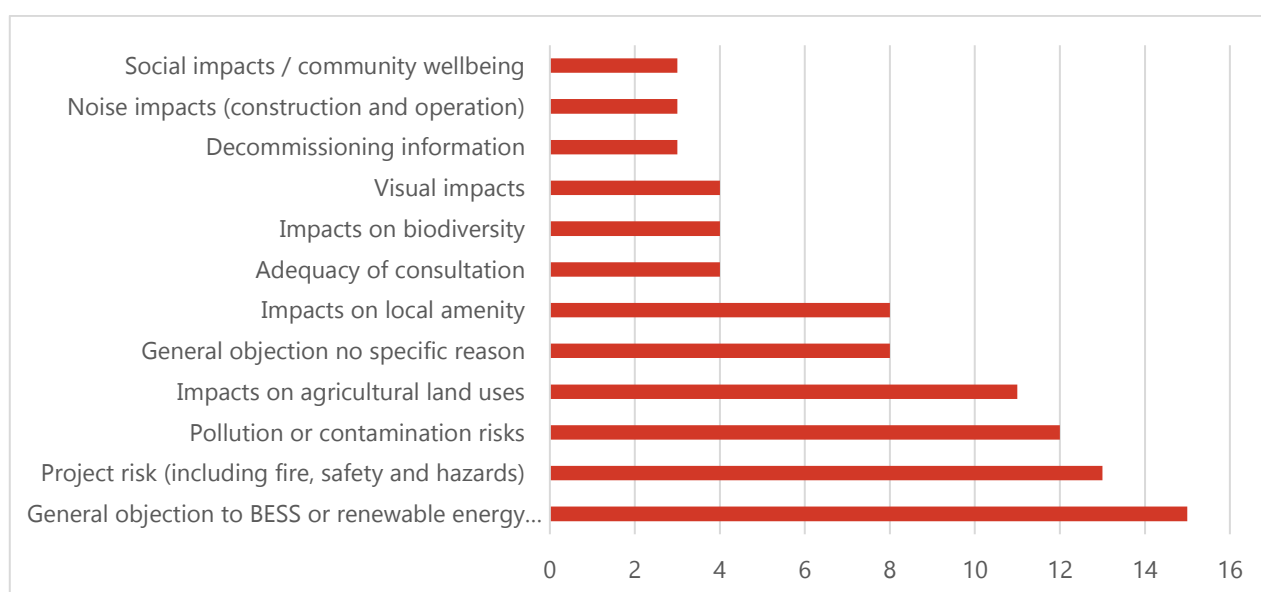
Table 1 - Breakdown of public submissions

Submitter distance to development footprint	Number of submissions	Position
Local 0 – 5 km	0	N/A
Regional 5 – 100 km	1	Comment - organisation
Broader Community > 100km	59	Object - public
	7	Object - organisation
	1	Comment - public
Total	68	66 x objectors; 2 x comments

Key matters raised in the submissions are summarised in **Figure 1**. Key issues raised include the following:

- > General objection to BESS or renewable energy infrastructure
- > Project risk (including fire, safety and hazards)
- > Pollution or contamination risks
- > Impacts on agricultural land uses
- > General objection no specific reason
- > Impacts on local amenity
- > Adequacy of consultation
- > Impacts on biodiversity
- > Visual impacts
- > Decommissioning information
- > Noise impacts (construction and operation)
- > Social impacts / community wellbeing

Figure 1 - Key issues raised in public submissions



The comments received have resulted in the following technical reports being updated to address specific comments and concerns:

- > Aboriginal Cultural Heritage Assessment;
- > Biodiversity Development Assessment Report;
- > Traffic Impact Assessment;
- > Flood Impact Assessment;
- > Oversize Overmass Route Study;
- > Preliminary Site Investigation.

Details of the engagement that occurred throughout the response to submissions phase is provided in **Table 5** and **Table 6**, with copies of consultation issued and received is provided in **Appendix C**.

Proposed refinements and amendments

The project has been both refined and amended in response to feedback received during the public exhibition period. Separately and concurrently, an Amendment Report is provided that outlines the following project amendment at the request of Transport for NSW (TfNSW):

- > Inclusion of road upgrades at the intersection of Riverina Highway/Canalla Road and Marantellis Roads, resulting in the increase area of the development footprint.

Overall justification

Submissions raised questions regarding the need for the project and its consistency with NSW Government policy. As outlined in the EIS, the NSW Government has identified the need for structural reform of the State's electricity system in response to ageing generators, network congestion and increasing cost pressures.

The project aligns with this policy framework by providing battery energy storage capacity that supports the transition to a decentralised electricity system and facilitates the integration of renewable energy generation. The BESS provides firming capacity by storing energy during periods of renewable generation and discharging during peak demand or low generation periods, supporting grid reliability.

The Finley BESS has an anticipated operational lifespan of approximately 20–25 years and would contribute to the NSW Government's objectives of reliability, affordability and sustainability. The project also supports the efficient utilisation of existing electricity infrastructure through its connection to the Transgrid Finley 132/66 kV Substation.

The project has been sited and designed to minimise environmental impacts. Where impacts cannot be avoided, mitigation and management measures have been identified through the EIS and supporting technical studies.

Having regard to the matters raised in submissions, the project remains consistent with the objects of the *Environmental Planning and Assessment Act 1979* and the principles of Ecologically Sustainable Development.

1. INTRODUCTION

BESS Pacific Pty Ltd seeks to develop a 100 Megawatt AC (MW_{AC})/ 200 Megawatt Hour (MWh) Battery Energy Storage System (BESS) impacting land within Lot 3 DP740920 (private land under agreement by the proponent), Lot B DP961693 (Transgrid Finley substation) and the road reserves of Canalla Road and Broockmanns Road, Finley. Collectively, this land was defined in the EIS as the 'development site' and comprised of an area of approximately 10.45 hectares (ha).

The proposed Finley BESS, as assessed in the exhibited EIS, includes:

- > Installation of containerised lithium-ion phosphate batteries with a capacity of approximately 100 MW_{AC} / 200 MWh, with associated inverters, switchgear and a control building;
- > Underground transmission cable to connect the BESS to the Transgrid Finley substation approximately 480 metres in length;
- > Cabling and collector units, site office, storage area, internal access tracks, on-site parking, security fencing and temporary construction laydown area; and
- > Construction of new heavy vehicle site access from Canalla Road and light vehicle accesses to Broockmanns Road.

Following public exhibition of the EIS and subsequent engagement with Transport for NSW (TfNSW), a refinement to the project has been identified to accommodate intersection upgrade works at Riverina Highway / Canalla Road / Marantellis Road intersection, to ensure road safety and compliance with relevant Austroads design standards. This refinement is addressed in a separate Amendment Report outlining the proposed project amendment to be included within the development site.

To facilitate the intersection upgrade works, the development site has been refined to include the additional area of approximately 1.83 ha of road and road reserve associated with the intersection upgrade. As refined, the development site now comprises approximately 12.28 ha.

Notably:

- > No changes are proposed to the location, layout or extent of the BESS and substation infrastructure as assessed in the exhibited EIS;
- > The additional land area relates solely to road intersection upgrade works in response to TfNSW; and
- > The nature, scale and purpose of the Finley BESS remain unchanged.

Key features of the project are summarised in **Table 2**.

Table 2 - Project summary

Project Element	Summary of the Project
Development site details	> Lot 3 DP740920, Riverina Highway, Finley (BESS site); > Lot B DP961693, 168 Canalla Road, Finley (substation site); > Broockmanns/Canalla Road reserves (transmission line easement); and > Riverina Highway / Canalla Road / Marantellis Road intersection.
Development footprint	The area accommodating the BESS infrastructure and associated operational and construction infrastructure – having an area of approximately 3.5 ha Development Site (red line boundary) 12.28 ha.

Project Element	Summary of the Project
Battery storage capacity	100 MW _{AC} /200 MWh
BESS Lifespan	Up to 20-25 years
Infrastructure	> Approximately 100 MW_{AC}/200 MWh BESS occupies the majority of the development site; > Upgrade works within the existing 132/66kV Transgrid Finley Substation to accommodate the connection of the BESS; > Underground transmission cables approximately 480 m long connecting the BESS substation to the Finley Transgrid substation; > Temporary construction compound including material laydown areas, site offices, vehicle parking and amenities; > Construction of a new property accesses from Canalla and Broockmanns Roads; > Security fencing and lighting; and > Specific native vegetation screening from identified visual impact locations if required.
Site Access	Heavy vehicle access the site via a new access treatment from Canalla Road. Transgrid vehicles will use a new light vehicle entrance from Broockmanns Road and light vehicle associated with the project will use the existing (upgraded) access off Broockmanns Road.
Access route	> Heavy vehicles carrying BESS components would travel to the site from the Port of Melbourne and utilising the proposed heavy vehicle site access location on Canalla Road. > Heavy vehicles carrying project construction materials and machinery, utilising the proposed heavy vehicle site access location on Canalla Road. > Light vehicles including shuttle buses carrying construction workers would be expected to travel from Finley and Deniliquin via either Riverina Highway and Canalla Road, or, if from Finely, via Broockmanns Road.
Construction	> Construction is expected to commence in 2026 and occur over an approximately 11 month period. > Construction would occur during standard construction hours. However, it is anticipated that some activities that are inaudible and would not result in amenity impacts to surrounding receivers, may be required to occur outside of standard hours in accordance with an Out-of-Hours Construction Protocol.
Operations and maintenance	The project would be operated remotely with occasional maintenance activities generally be undertaken by up to two Full Time Equivalent (FTE) personnel.
Decommissioning and rehabilitation	> The development site would be progressively rehabilitated during the decommissioning period, including removal of the temporary construction facilities. Temporary construction facilities include temporary buildings installed on site to provide for workers associated with decommissioning.

Project Element	Summary of the Project
	> At the end of operational life, components above ground and below ground (with depth subject to agreement with landowner) would be removed and land rehabilitated to as close as possible to pre-development conditions.
Workforce	Up to 55 FTE construction jobs and 2 FTE ongoing operational jobs
Hours of Operation	24 hours, 7 days a week



- Legend**
- Development Site
 - Primary Site Access (Heavy Vehicle)
 - Lot
 - Road
 - Water Body
 - Watercourse
 - Existing Infrastructure**
 - Existing Substation
 - Existing Easement
 - Essential Energy OH
 - Essential Energy UG
 - Transgrid OH
 - Transgrid Optic Fibre
 - Essential Energy Pole
 - Transgrid Pit
 - Proposed Development**
 - Substation Switch Area
 - Internal Road
 - Temporary Facilities**
 - Car Parking
 - Laydown
 - Site Offices
 - BESS Substation
 - BESS Buildings
 - Battery
 - Inverter
 - Gate
 - Fence
 - Screening Vegetation
 - Proposed UG Connection line
 - Watertank
 - CCTV Mast
 - BESS Lighting Mast

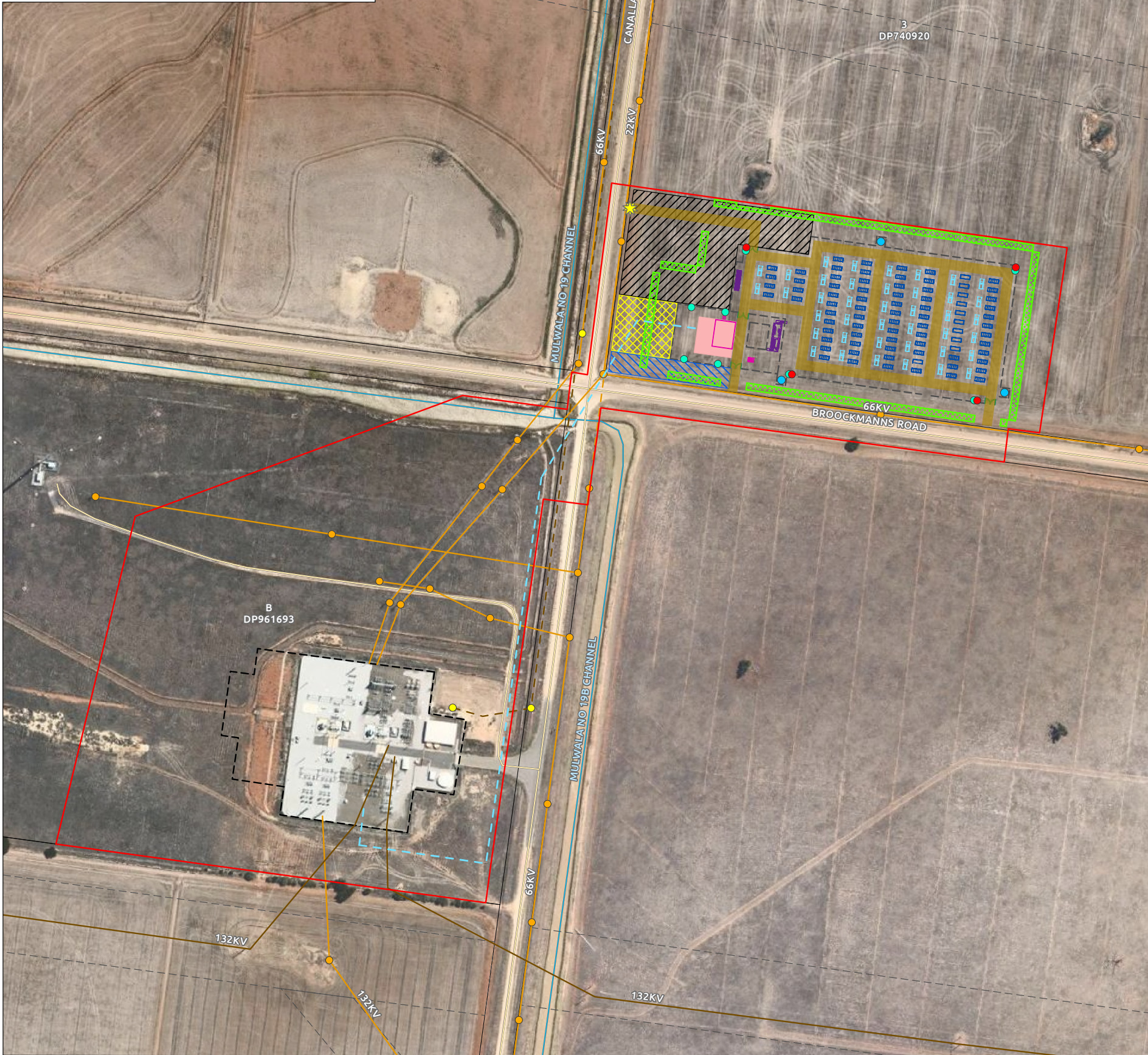


Finley BESS

Figure 2
Local context



Detail of Intersection



- Legend**

 - Development Site
 - Primary Site Access (Heavy Vehicle)
 - Lot
 - Road
 - Watercourse
 - Existing Infrastructure
 - Existing Substation
 - Existing Easement
 - Essential Energy OH
 - Essential Energy UG
 - Transgrid OH
 - Transgrid Optic Fibre
- Proposed Development**

 - Substation Switch Area
 - Internal Road
 - Temporary Facilities**
 - Car Parking
 - Laydown
 - Site Offices
 - BESS Substation
 - BESS Buildings
 - Battery
 - Inverter
- Essential Energy Pole
 - Transgrid Pit
 - Gate
 - Fence
 - Screening Vegetation
 - Proposed UG Connection line
 - Watertank
 - CCTV Mast
 - BESS Lighting Mast



Figure 3
Development Site

1.1 Purpose of this report

Premise Australia Pty Ltd has prepared this Submissions Report on behalf of BESS Pacific Pty Ltd in response to submissions received during the public exhibition of the EIS exhibition phase for the Finley Battery Energy Storage System (BESS).

The purpose of this Submissions Report, prepared in accordance with the *State Significant Development Guidelines – Preparing a Submissions Report* (DPIE, 2024), is to demonstrate that issues raised during exhibition of the EIS have been transparently considered and appropriately addressed. Specifically, the report:

- > Summarises submissions received from government agencies, Council, community groups and members of the public;
- > Identifies and groups key issues raised to provide a clear and consistent framework for response;
- > Presents the Applicant's responses to the issues raised, including clarification of matters addressed in the EIS, identification of any project refinements, and reference to updated technical assessments where relevant;
- > Outlines commitments and mitigation measures proposed to avoid, minimise or manage environmental and social impacts; and
- > Provides the consent authority with confidence that all matters raised in submissions have been systematically considered in accordance with the *Environmental Planning and Assessment Act 1979*.

This Submissions Report should be read in conjunction with the EIS and the supporting technical studies submitted with the application, this Submissions Report and the Amendment Report.

In response to advice received from Transport for NSW (TfNSW) and subsequent engagement, a separate Amendment Report has been prepared to document a refinement to the project, involving a minor extension to the development site to provide for:

- > Inclusion of intersection upgrade works at the Riverina Highway / Canalla Road / Marantellis Road intersection.

The Amendment Report has been prepared to document the refined scope of works and the associated environmental assessment outcomes. The refinement does not alter the fundamental nature, scale or purpose of the Finley BESS and has been undertaken to ensure compliance with Austroads standards.

The following technical reports have been updated in response to submissions received during exhibition and project amendments, and are appended in full to this report and the Amendment Report:

- > An updated Biodiversity Development Assessment Report (BDAR) to address matters raised by Conservation Programs, Heritage and Regulation (CPHR) and to reflect the amended project footprint, is provided in **Appendix E**.
- > An updated Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared to reflect the amended development site associated with the TfNSW requested intersection upgrade works and to address agency expectations that Aboriginal cultural heritage assessment aligns with the final disturbance site. The updated ACHAR is provided in **Appendix F** in draft. Upon completion of RAP consultation, the final report will be provided to the Department in full.
- > An updated Traffic Impact Assessment (TIA) including has been prepared to address access design, sight distance, and intersection treatments to respond to comments raised by TfNSW and is provided in **Appendix G**.



- > A standalone Flood Impact Assessment (FIA) has been prepared as an addition to the Water Impact Assessment in response to advice received from NSW State Emergency Service (SES) and CPHR, to evaluate post-development and cumulative flood impacts and is provided in **Appendix H**.
- > An updated Oversize Overmass (OSOM) Route Study has been prepared to affirm haulage routes, existing and proposed intersection treatments, and management measures for large vehicle movements during construction, including refinements to the identified OSOM route to ensure ongoing compliance with interstate heavy vehicle access controls, is provided in **Appendix I**.
- > A Preliminary Site Investigation (PSI) has been prepared to support consideration of potential residual contamination risks associated with the project, informed by agency advice and issues raised during public exhibition, and to inform future site management and decommissioning, and is provided in **Appendix J**.



2. ANALYSIS OF SUBMISSIONS

The EIS was placed on exhibition between the 30 May 2025 and 27 June 2025. During this period, a total of 66 submissions by way of objection were received, being:

- > 59 submissions in objection from members of the public; and
- > 7 submissions in objection from community groups.

In addition, the following submissions were also received:

- > 13 comments from a regulatory agencies, including Berrigan Shire Council;
- > 1 submission making comment from a member of the public; and
- > 1 submission making comment from a community group.

Analysis of the geographic distribution of public submissions indicates that the minority of objections were lodged from within the immediate locality of the proposed Finley BESS, with the larger proportion originating from outside the local and regional area.

Of the total 66 public objections received:

- > Zero submissions were received from within 5 kms of the development site;
- > Zero submissions were received from within the broader regional area (5–100 kilometres); and
- > 66 submissions were lodged from locations greater than 100 kms from Finley, reflecting a broader interest in the proposal beyond the local and regional context.

This distribution of submission demonstrates that while local and regional concerns have been raised and are addressed in this Submissions Report, a substantial proportion of submissions were generated from outside the area most likely to experience direct or localised impacts associated with the development.

Notwithstanding the geographic origin of submissions, all matters raised have been considered on their merits and are addressed in this Submissions Report with reference to the EIS and supporting technical studies.

Figure 4 - Submissions in proximity to the development site

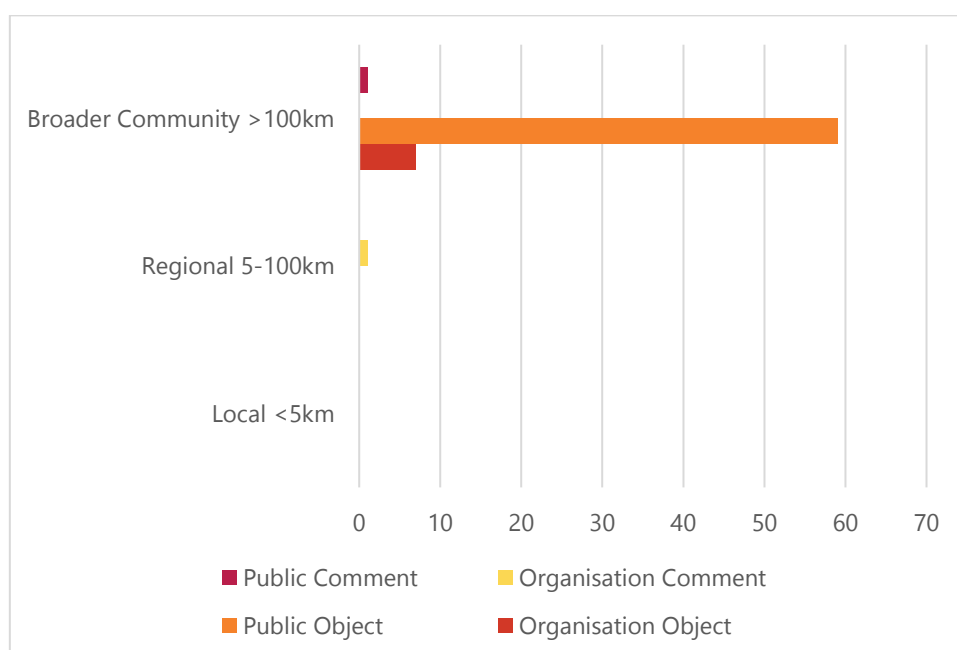


Table 3 - Number of submissions received

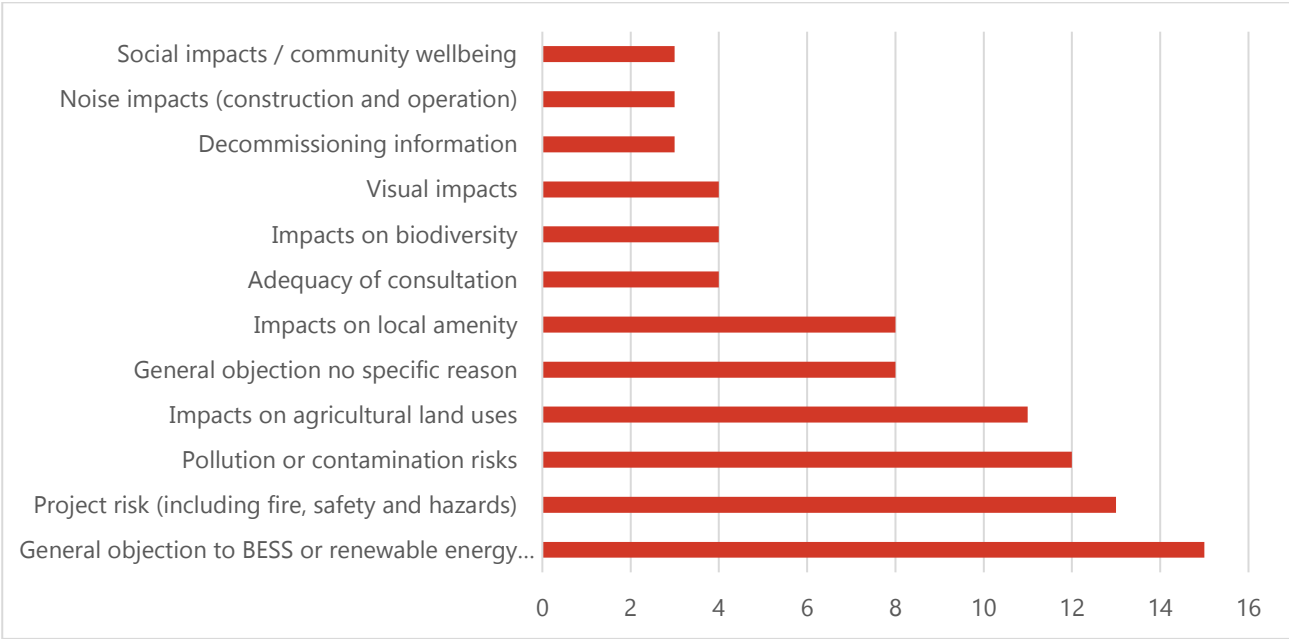
Submitter Type	Classification	Local (< 5km)	Regional (5-100km)	Broader Community (> 100km)
Organisation	Object	0	0	7
Public	Object	0	0	59
Organisation	Comment	0	1	0
Public	Comment	0	0	1
Total		0	1	67

Categorisation of matters raised in submissions is summarised in **Section 4.1**. Issues raised include the following:

- > General objection to battery energy storage systems or renewable energy infrastructure more broadly;
- > Concerns regarding potential risks associated with the operation of the Battery Energy Storage System, including fire, safety and hazard-related matters;
- > Concerns regarding the potential for pollution or contamination arising from construction, operation or incident scenarios;
- > Concerns regarding impacts on agricultural land uses, including the loss of productive agricultural land and potential indirect impacts associated with fire or pollution;
- > Submissions objecting to the project without specifying a particular reason;
- > Generalised concerns regarding potential impacts on local amenity, including perceived changes to rural character;
- > Concerns regarding the extent and adequacy of consultation undertaken, and the outcomes of that consultation in informing project design and delivery;
- > Concerns regarding potential impacts on biodiversity;
- > Concerns regarding visual impacts associated with the project;
- > Concerns regarding the adequacy of information relating to decommissioning and site rehabilitation at the end of the project life;
- > Concerns regarding noise impacts during both the construction and operational phases of the development; and
- > Broader concerns regarding social impacts, including potential effects on community wellbeing.

Submissions often raised multiple issues, and the categories above are not mutually exclusive.

Figure 5 - Characterisation of submissions



3. ACTIONS TAKEN SINCE EXHIBITION

3.1 Project amendments

Following consideration of agency advice received during public exhibition period, the following amendment has been identified improve the project:

- > Inclusion of intersection upgrade works at the Riverina Highway/Canalla Road/Marantellis Road intersection.

The environmental impacts of the project amendments are assessed in the accompanying Amendment Report, which has been prepared and submitted concurrently with this Submissions Report.

3.2 Project refinements

The updated technical reports do not recommend or require any wholesale changes to the project but instead provide for project refinements. Updated mitigation measures and recommendations for actions to occur prior to construction ensure that key outcomes and project objectives can be achieved. Where applicable, the project mitigation measures have been revised, and the updated measures are detailed in **Appendix B**.

Following review of information received throughout the exhibition period, project refinements are limited to the following:

- > Inclusion of intersection upgrade works at the Riverina Highway/Canalla Road/Marantellis Road intersection; and
- > Refinement of the oversize/overmass (OSOM) haulage route in response to changes in Victorian heavy vehicle access controls implemented after exhibition of the EIS, with no change to construction methodology, on-site works or environmental impacts.

The OSOM route refinement relates solely to off-site transport logistics and does not alter the nature, scale or intensity of construction activities of the project.

3.3 Engagement

In accordance with the *SSD Guideline – Preparing a Submissions Report (DPHI, 2024) (the 'guideline')*, this section records engagement undertaken since exhibition of the EIS. The Applicant has continued to consult with stakeholders to ensure issues are clearly understood and addressed and remains committed to implementing appropriate mitigation and management measures in response to matters raised.

3.3.1 PUBLIC ENGAGEMENT

Following exhibition of the EIS, the Applicant has continued to engage with stakeholders to clarify issues raised in submissions. A summary of community consultation is provided below.

Table 4 - Public Consultation Summary

Stakeholder category	Individual stakeholder subcategory	Consultation summary
Community	Affected landowners surrounding the development	Following public exhibition of the EIS, ongoing community engagement has been undertaken through established communication channels,

Stakeholder category	Individual stakeholder subcategory	Consultation summary
		as documented in the Engagement Outcomes Report (Appendix R). This has included: > Maintenance of the project website to provide updates on the status of the project and key milestones; and > Operation of a dedicated project email address and phone line, which are monitored and used to respond to community enquiries. These mechanisms have provided an accessible means for the community to obtain current information about the project and to seek clarification regarding the project and the assessment process. The Applicant will continue to utilise these channels through the determination, construction and operational phases of the project.
Authority	Roads Authorities	Gransolar has engaged with Transport for NSW (TfNSW) regarding the requested intersection upgrade works. Inclusion of Victorian heavy vehicle access limits implemented post-exhibition of the EIS, have informed refinements to the OSOM haulage strategy.

As outlined in the EIS and Engagement Outcomes Report, the Applicant will continue to keep stakeholders and the community informed throughout the assessment and determination phases of the project, including:

- > Ongoing consultation with relevant regulatory agencies to address matters raised during the exhibition period and through the preparation of this Submissions Report and Amendment Report;
- > Continued operation of established community contact channels, including an online enquiry form to enable enquiries and feedback to be received and responded to;
- > Provision of updated information regarding the project and assessment process through existing project communication channels; and
- > Continued availability of two-way communication to enable stakeholders and community members to seek clarification regarding the project, its potential impacts and the approval process.

Table 5 - Ongoing engagement activities

Date	Engagement
Ongoing	Online maintain the project website.

The Applicant remains committed to transparent, ongoing engagement throughout all project stages. This includes providing timely information, addressing concerns through appropriate mitigation and management measures, and ensuring that community and stakeholder views continue to inform project delivery.

3.3.2 AGENCY ENGAGEMENT

Following lodgement of the EIS, the Applicant has maintained active engagement with relevant agencies in line with the *guideline* and commitments documented in the EIS. This engagement has focused on clarifying issues raised in agency advice, confirming technical matters, and ensuring that agency advice informs the projects mitigation framework.

Table 6 - Agency engagement

Agency	Date	Consultation summary
Council	3 September 2025	Applicant requests and receives confirmation of available water supply, from council, for the Project. Email confirmation of Council's capability to supply the required water is provided in Appendix C .
	3 December 2025	Applicant provides Council with a Letter of Offer for Planning Agreement. A copy of the offer is provided in Appendix C .
DPHI	7 November 2025	Applicant requested and received the consent requirements for the Finley, Jindera and Deniliquin East BESS Projects regarding the VPA Letter of Offer.
	16 December 2025	Applicant received confirmation from DPHI that their VPA Letter of Offer satisfies the requirements for consent. A copy of the offer is provided in Appendix C .
Transport for NSW	6 August 2025	Applicant requested meeting to discuss agency advice.
	12 August 2025	Original meeting with TfNSW postponed – rescheduled to 14 August 2025.
	14 August 2025	Applicant meeting with TfNSW to discuss agency advice received.
	27 October 2025	Request follow up meeting to discuss proposed intersection upgrade options.
	30 October 2025	
	6 November 2025	
	10 November 2025	
	17 November 2025	
	19 November 2025	
	24 November 2025	
	28 November 2025	Applicant meeting with TfNSW including road design team to discuss proposed intersection upgrade design options for Riverina Highway / Canalla Road / Marantellis Road intersection upgrades. Meeting minutes were also circulated after the meeting.
CPHR	5 August 2025	Applicant requested meeting to discuss agency advice.
	12 August 2025	Applicant meeting with CPHR to discuss agency advice received.

Agency	Date	Consultation summary
	15 August 2025	Applicant circulated meeting minutes from 12 August 2025 with CPHR attendees.
	9 September 2025	Applicant request follow up meeting with CPHR to clarify approach regarding hydrological and hydraulic model inputs.
	10 September 2025	Applicant meeting and minutes circulated with CPHR clarifying approach regarding hydrological and hydraulic model inputs for FIA.
	11 September 2025	Applicant provided memo addressing approach moving forward to address agency advice dated 1 July 2025 and meeting 12 August 2025.
	7 October 2025	Applicant follow up with CPHR on memo addressing approach moving forward to address agency advice dated 1 July 2025 and meeting 12 August 2025.
	16 October 2025	CPHR confirm approach in memo from 7 October to update the BDAR satisfactorily address concerns raised.
SES	29 July 2025	Applicant requested meeting to discuss agency advice.
	7 August 2025	Applicant meeting with SES to discuss approach to address agency advice.
Transgrid / Lumea	30 July 2025	Monthly meetings are held between the Applicant, Lumea, and Transgrid by extension where relevant. The purpose of the meetings is to discuss the Grid Connection application and associated planning requirements for the Project Walter portfolio, including Finley BESS. In the context of the planning application, these discussions included the incorporation of Transgrid planning requirements and inputs into the EIS.
	8 September 2025	
	1 October 2025	
	3 December 2025	
	28 January 2026	
	29 January 2026	Applicant requested Transgrid landowners' consent for the required works on Transgrid owned land for the Project's Development Application.

Copies of agency engagement are provided in **Appendix C**.

Through this continued engagement, the Applicant demonstrates a clear commitment to addressing agency advice, ensuring compliance with statutory requirements, and delivering the project in a manner that is responsive, transparent and consistent with the objectives of the planning framework.

3.4 Further assessment

The project has been refined following public exhibition of the EIS and ongoing engagement with relevant agencies and stakeholders. A separate Amendment Report is provided concurrently with this Submissions Report to document the minor refinement to the project area that has arisen from this process.

Specifically, in response to advice received from TfNSW and subsequent engagement, the Amendment Report addresses a minor extension to the development site to provide for:

- > Inclusion of intersection upgrade works at the Riverina Highway / Canalla Road / Marantellis Road intersection.

The project refinements outlined in **Section 3.2** are generally minor in nature and do not materially alter the development or the conclusions of the EIS.

In response to matters raised in submissions received during exhibition, and to reflect project amendments and refinements, several technical assessments have been updated and are discussed in the following sections.

3.4.1 UPDATED BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT

An updated Biodiversity Development Assessment Report (BDAR) is provided in **Appendix E** and is appended to the Amendment Report. The updated BDAR has been prepared to respond to agency advice received from the CPHR and to reflect the refined development site associated with the amendment to include the intersection upgrade works at the Riverina Highway / Canalla Road / Marantellis Road intersection.

The updated BDAR addresses matters raised by CPHR during the exhibition of the EIS, including confirmation of assessment scope, mapping accuracy, survey validation and biodiversity credit obligations. The assessment has been updated in accordance with the Biodiversity Assessment Method (2020).

As a result of the amendment, the development site has increased from 10.45 ha to 12.28 ha. Within the amended development site, the proportion of native vegetation comprised of derived native grassland (DNG) is 6.44 ha. The remaining 5.84 ha comprises of infrastructure (1.38 ha), cropping (2.78 ha), exotic grassland (0.32) and disturbed ground such as roads (1.38 ha).

The project has been designed to minimise impacts to native vegetation, including avoiding direct impacts to remnant native trees, and derived native grassland, minimising the area of Inland Grey Box Woodland TEC to be cleared. Residual impacts that cannot be avoided are the permanent removal of up to 9.54 ha of vegetation, including:

- > Cropped Land (2.78 ha);
- > PCT 76 DNG Roadside (1.39 ha);
- > PCT 76 DNG Poor (4.75 ha);
- > PCT 76 DNG Wet (0.30 ha); and
- > PCT 76 Exotic Grassland (0.32).

These direct impacts give rise to a biodiversity offset obligation of 54 ecosystem credits.

The updated BDAR responds directly to each item of agency advice and includes revised mapping and calculations where required to reflect the amended development site. Agency advice from CPHR specifically is addressed in **Section 4.2**.

Key refinements to biodiversity mitigation measures include:

- > Prior to commencement of works on site, establishment and maintenance of tree protection zones (TPZs) around woody vegetation directly surrounding the subject land
- > Engagement of a suitably licensed wildlife carer or veterinary practice prior to vegetation clearing to respond to injured fauna if required; and
- > Implementation of sediment and erosion control measures in accordance with a Soil and Water Management Plan (SWMP) prepared prior to construction and consistent with Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004).

With these measures in place, biodiversity impacts remain localised, manageable and capable of being adequately mitigated. Updated mitigation measures are consolidated in **Appendix B**.

3.4.2 UPDATED ABORIGINAL CULTURAL HERITAGE ASSESSMENT

In response to advice from Heritage NSW regarding consultation continuity, a further project update was issued to all RAPs to ensure active engagement was maintained throughout the assessment process provided in **Appendix F**.

Following public exhibition of the EIS, an updated ACHA (Premise, 2025) has been prepared to reflect the projects refinements and amendments within the existing development site. The revised ACHA confirms that the refinements and proposed amendments do not result in new impacts to Aboriginal cultural heritage.

The revised ACHA is undergoing consultation with RAPs. The revised ACHA has been appended in draft for reference, with the final report to be provided to the Department in full upon completion of the consultation process.

On the basis of the above, it is concluded that Aboriginal cultural heritage impacts associated with the project are anticipated to be minor and manageable, subject to implementation of recommended mitigation measures outlined in **Appendix B**.

Agency advice from Heritage NSW ACH specifically is addressed in **Section 4.2**.

3.4.3 UPDATED TRAFFIC IMPACT ASSESSMENT

An updated Traffic Impact Assessment (TIA) has been prepared and is provided in **Appendix G** to respond directly to advice received from Transport for NSW (TfNSW) during and following exhibition of the EIS.

The updated TIA incorporates detailed intersection modelling, turn warrant assessments and Safe System Assessment for the Riverina Highway / Canalla Road / Marantellis Road intersection. Two intersection upgrade options were assessed, a basic access left / basic access right (BAL/BAR) configuration and a higher-order AUL/CHR configuration.

The Safe System Assessment confirms that both upgrade options achieve the same overall Safe System score of 32 (out of a possible 448) across the check cases, representing a clear improvement on the existing intersection configuration (score of 48). This outcome demonstrates strong alignment with Safe System principles, including safer speeds, safer roads and roadsides, and safer intersections.

The assessment further confirms that adoption of the more expansive AUL/CHR treatment does not result in an improved Safe System outcome when compared to the BAL/BAR configuration. Importantly, the BAL/BAR treatment satisfies all applicable Austroads and TfNSW turn warrant requirements and provides an appropriate level of safety and operational performance of the traffic conditions.

Given that the higher-order treatment would require a substantially larger intersection footprint, the updated TIA concludes that it would result in additional impacts, including increased disturbance to surrounding land, greater biodiversity impacts and additional maintenance and asset management burdens, without delivering any corresponding safety benefit. Accordingly, the BAL/BAR configuration is considered the most appropriate and proportionate response to the identified traffic demands and risk profile.

With the proposed BAL/BAR intersection upgrades in place, the surrounding road network is predicted to continue to operate at a satisfactory level of service during both construction and operation, with no material adverse impacts on traffic safety or network capacity. Operational traffic generation is negligible, and construction-related traffic is temporary and capable of being effectively managed through standard traffic management measures.

The updated TIA also confirms that site access arrangements, internal circulation, parking provision and sight distances are satisfactory and compliant with relevant guidelines. Oversize Overmass (OSOM) vehicle movements are addressed separately in **Section 3.4.5** and **Appendix I** and do not alter the conclusions of the TIA.

Where relevant, updated mitigation measures and recommendations have been incorporated into the consolidated mitigation framework provided in **Appendix B**.

The findings of the updated TIA confirm that the project, as refined, remains acceptable from a traffic and transport perspective and is consistent with relevant technical standards, Safe Systems principles and agency requirements.

3.4.4 FLOOD IMPACT ASSESSMENT

A standalone Flood Impact Assessment (FIA) has been prepared as an addition to the Water Impact Assessment and is appended in **Appendix H**. The FIA has been undertaken in response to advice received from NSW State Emergency Service (SES) and CPHR during the exhibition of the EIS and to further inform the Department's assessment of potential flood-related risks associated with the project.

The FIA evaluates post-development and cumulative flood impacts associated with the Finley BESS, including the refined development site. The assessment considers flood behaviour, overland flow paths, flood storage, flood levels, and flood hazard, and confirms whether the project would result in any adverse impacts on surrounding land, infrastructure, or flood emergency response arrangements.

The scope and methodology of the FIA have been informed by relevant agency advice, including matters raised by CPHR, particularly in relation to cumulative impacts, floodplain function, and potential interactions between flood behaviour and environmental values.

Localised variations in flood behaviour are confined to the immediate vicinity of the raised BESS infrastructure footprints and internal drainage paths; however, these changes do not result in adverse impacts on flood conveyance, flood storage, or flood risk to surrounding land. Peak flow analysis confirms that flows within the broader catchment and along key overland flow paths remain effectively unchanged under post-development conditions.

Agency advice from SES and CPHR are specifically addressed in **Section 4.2**.

Where relevant, mitigation and management measures have been identified and are consolidated in **Appendix B**.



3.4.5 UPDATED OVERSIZE OVERMASS ROUTE ASSESSMENT

An updated Oversize Overmass (OSOM) Route Study has been prepared and is provided in **Appendix I**. The updated assessment has been undertaken to respond directly to agency advice received from TfNSW, as well as changes to heavy vehicle access arrangements implemented in Victoria after exhibition of the EIS.

Since exhibition of the EIS, Transport Victoria has introduced 24-hour no-truck zones within parts of inner-western Melbourne, affecting sections of the previously identified OSOM transport route from the Port of Melbourne. In response, the OSOM route has been reviewed and refined to ensure continued compliance with Victorian and NSW heavy vehicle access requirements. The revised route utilises approved over-dimensional freight corridors, including Whitehall Street, Francis Street, Hyde Street, Simcock Avenue and the West Gate Freeway on-ramp, and has been subject to additional swept path analysis at key intersections within metropolitan Melbourne.

The updated OSOM Route Study confirms that transport of the project's critical oversize component, being the one-off main transformer, remains feasible from the Port of Melbourne to the project site, subject to standard permit approvals and traffic management measures. The assessment identifies that only minor and temporary modifications are required along the route, such as temporary removal of signage, localised traffic control at pinch points, and coordination with utility and rail authorities. No permanent road upgrades are required outside of those already incorporated by request of TfNSW for intersection upgrades at Riverina Highway / Canalla Road / Marantellis Road.

The OSOM Route Study confirms that:

- > The revised transport route utilises roads within the approved Victorian OSOM and NSW OSOM networks;
- > All identified pinch points have been assessed through swept path analysis and can be negotiated without permanent infrastructure modification;
- > Bridge and rail crossing assessments will be undertaken through the permitting process with the relevant road and rail authorities (refer to report PT3030 for TfNSW's assessment);
- > Appropriate pilot vehicles, escorts, and traffic control measures will be implemented in accordance with jurisdictional requirements; and
- > OSOM transport activities are temporary, infrequent, and confined to the construction phase only.

The OSOM route refinement relates solely to off-site transport logistics and does not alter the nature, scale or intensity of construction works at the Finley BESS site. Importantly, the updated assessment confirms that the revised route does not give rise to any new or increased environmental, traffic, safety or amenity impacts beyond those assessed in the exhibited EIS.

The conclusions of the updated OSOM Route Study confirm that, with implementation of the recommended management measures and permitting requirements, OSOM deliveries can be undertaken safely and in compliance with relevant regulatory frameworks.

Where relevant, mitigation and management measures have been identified and are consolidated in **Appendix B**.

3.4.6 PRELIMINARY SITE INVESTIGATION

A Preliminary Site Investigation (PSI) has been prepared and is provided in **Appendix J** in response to matters raised during exhibition and to support the consent authority's consideration under clause 4.6 of the *Resilience and Hazards State Environmental Planning Policy 2021*.



The PSI concludes the investigation area has predominantly been used for rural/agricultural purposes, with no historical structures recorded, and that analytical results did not identify contaminants at concentrations exceeding the adopted human health or ecological investigation criteria.

The conceptual site model identified no potentially complete source – pathway – receptor linkages, and therefore the potential for contamination-related risks to human health or ecological receptors is considered low. On this basis, the PSI concludes that no further contamination assessment is warranted for historical land practices at the site.

Notwithstanding the low residual risk, the PSI recommends standard construction-phase controls for unexpected finds and to manage soil disturbance, including appropriate handling of any suspect or impacted material. The proposed controls are consistent with the EIS mitigation framework for bunding/spill containment and management of potentially contaminated runoff through construction management planning.

Where relevant, mitigation and management measures have been identified and are consolidated in **Appendix B**.



4. RESPONSE TO SUBMISSIONS

This section provides a summary of issues raised by public submissions during the DPHI exhibition phase, focusing on issues raised by submissions raised rather than individual submissions.

Appendix D provides a detailed response to public submissions.

4.1 Members of the public

The project received a total of 68 submissions from members of the public and community interest groups, of which 66 were in objection and two (2) making comment on the project.

Table 7 - Submission distribution by distance

Distance to project	No. of Submissions	Percentage (%)	Breakdown
Local (<5 km)	0	0%	0 Objections
Regional (5 - 100 km)	1	1.5%	1 Organisational comment
Broader (>100 km)	67	98.5%	7 Community group objections 59 Public objections 1 Public comment

As demonstrated, more than 98% of submissions were received from members of the public and community interest groups located more than 100 km from the project site.

The categorisation of matters raised by members of the public in objection to the project include:

- > General objection to battery energy storage systems or renewable energy infrastructure more broadly;
- > Concerns regarding potential risks associated with the operation of the Battery Energy Storage System, including fire, safety and hazard-related matters;
- > Concerns regarding the potential for pollution or contamination arising from construction, operation or incident scenarios;
- > Concerns regarding impacts on agricultural land uses, including the loss of productive agricultural land and potential indirect impacts associated with fire or pollution;
- > Submissions objecting to the project without specifying a particular reason;
- > Generalised concerns regarding potential impacts on local amenity, including perceived changes to rural character;
- > Concerns regarding the extent and adequacy of consultation undertaken, and the outcomes of that consultation in informing project design and delivery;
- > Concerns regarding potential impacts on biodiversity;
- > Concerns regarding visual impacts associated with the project;
- > Concerns regarding the adequacy of information relating to decommissioning and site rehabilitation at the end of the project life;
- > Concerns regarding noise impacts during both the construction and operational phases of the development; and

- > Broader concerns regarding social impacts, including potential effects on community wellbeing.

The categorisation of issues does not imply that submissions raised only a single concern, noting that many submissions identified multiple matters. Each issue category is addressed below with reference to the relevant sections of the EIS and supporting technical studies. Mitigation and management measures relevant to each issue are consolidated in **Appendix B**, which reflects both the EIS commitments and any updates arising from further assessment.



Table 8 - Response to public submissions

Submission issue	Response	Where addressed	Applicant Commitments
General objection to BESS or renewable energy infrastructure	Some submissions raised a general objection to battery energy storage systems or renewable energy infrastructure in principle. As outlined in Section 2 of the EIS, the delivery of battery energy storage projects is consistent with Commonwealth, State, regional and local planning policies that seek to support the transition of the electricity system, reduce greenhouse gas emissions and improve network reliability. These policy settings recognise the role of battery storage in supporting renewable energy generation and managing variability in electricity supply. The proposed Finley Battery Energy Storage System is intended to charge from the electricity network during periods of lower demand and discharge during periods of higher demand. In doing so, the project would provide firming capacity, supporting the stability and reliability of the electricity network, as described in the EIS. The assessment of the project has focused on the site-specific environmental, social and economic impacts associated with the development, rather than objections to renewable energy infrastructure more broadly. These impacts have been assessed in the EIS and supporting technical studies, with mitigation measures identified where relevant.	EIS – Section 2.	The Applicant commits to delivering the Finley BESS in a manner consistent with the policy framework outlined in the EIS, supporting NSW renewable energy and climate change objectives.
Project risk (including fire, safety and hazards)	Concerns regarding potential risks associated with the operation of the Finley BESS, including fire, safety and hazard-related matters. Risks associated with the Finley BESS, including fire, safety and hazard-related matters, have been rigorously assessed through the EIS and supporting technical studies, including the Preliminary Hazard Analysis (Appendix M) and Bush Fire Assessment Report (Appendix N). These assessments were undertaken having regard to relevant adopted policies, guidelines and standards, and in response to the requirements of the SEARs.	EIS – Section 6; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N; and Responses to agency advice - Table 9 .	The Applicant commits to implementing the mitigation and management measures set out in Appendix B , including those relating to the Environmental Management System (EMS), Bushfire Management and Emergency Response, and ongoing hazard monitoring, to ensure residual

Submission issue	Response	Where addressed	Applicant Commitments
	The assessment considered credible hazard and incident scenarios associated with battery energy storage systems and identified appropriate design, separation, management and operational controls to minimise risk. Residual risks associated with the project are addressed through the updated mitigation measures consolidated in Appendix B. Through the implementation of these measures, residual risks associated with the Finley BESS would be managed to levels that are considered acceptable and as low as reasonably practicable.		risks associated with the Finley BESS are managed to as low as reasonably practicable.
Pollution or contamination risks	Concerns were raised regarding the potential for pollution or contamination during construction, operation or as a result of incident scenarios. These matters have been assessed in the EIS, supported by specialist studies including the Water Impact Assessment (Appendix L), Preliminary Hazard Analysis (Appendix M) and consideration of hazardous materials handling. The assessment addressed potential sources of contamination, pathways for off-site impacts, and appropriate management measures to prevent pollution of land and water resources. Mitigation and management measures to avoid or minimise pollution risks are consolidated in Appendix B, including measures relating to construction environmental management, spill prevention and response, and operational controls.	EIS – Section 6; Water Impact Assessment – Appendix L; Preliminary Hazard Analysis – Appendix M; and Preliminary Site Investigation - Appendix J.	The Applicant commits to implementing the pollution prevention and environmental management measures set out in Appendix B , to minimise the risk of pollution or contamination during construction and operation of the Finley BESS.
Impacts on agricultural land uses	Submissions raised concerns regarding the loss of productive agricultural land and potential indirect impacts on surrounding agricultural activities, including impacts associated with fire or pollution. Agricultural impacts and land use compatibility were assessed in the EIS, supported by the Agricultural Impact Assessment (Appendix H) and Land Use Conflict Risk Assessment (Appendix G). The assessment considered the existing agricultural use of the site, the	EIS – Section 6; Agricultural Impact Assessment – Appendix H. Land Use Conflict Risk Assessment – Appendix G.	The Applicant commits to implementing the land use compatibility and mitigation measures outlined in Appendix B , to minimise impacts on agricultural land uses and adjacent agricultural activities.

Submission issue	Response	Where addressed	Applicant Commitments
	limited extent of land affected relative to the surrounding agricultural landscape, and the compatibility of the Finley BESS with ongoing agricultural activities. Mitigation measures addressing land use compatibility and protection of surrounding agricultural operations are consolidated in Appendix B.		
General objection no specific reason	Some submissions objected to the project without identifying specific matters of concern. These submissions have been acknowledged and considered as part of the overall assessment process. Site-specific issues raised in submissions that provided detailed concerns are addressed in this Submissions Report with reference to the EIS and supporting technical studies.	Submissions Report.	No additional commitments are proposed beyond those outlined in the EIS and consolidated in Appendix B .
Impacts on local amenity	Generalised concerns were raised regarding potential impacts on local amenity, including perceived changes to rural character. Amenity impacts were assessed comprehensively in the EIS, supported by specialist technical studies including the Noise Impact Assessment (Appendix J), Visual Impact Assessment (Appendix I), Traffic Impact Assessment (Appendix K), Biodiversity Development Assessment Report (Appendix E) and Water Impact Assessment (Appendix L). These assessments considered both construction and operational phases of the Finley BESS. Mitigation measures addressing amenity impacts are consolidated in Appendix B. The EIS identifies that the majority of potential amenity impacts would be temporary and primarily associated with construction, with limited impacts during operation.	EIS – Section 6; Visual Impact Assessment – Appendix I; Noise Impact Assessment – Appendix J; Traffic Impact Assessment – Appendix K; Biodiversity Development Assessment Report – Appendix E; Water Impact Assessment – Appendix L.	The Applicant commits to implementing the amenity-related mitigation measures outlined in Appendix B , including measures addressing noise, traffic, dust, vegetation and construction activities.
Adequacy of consultation	Concerns were raised regarding the level of consultation undertaken and the extent to which consultation outcomes informed project development. Consultation undertaken during preparation of the EIS is documented in Section 5 of the EIS, and post-exhibition engagement is summarised in Section 3 of this Submissions Report	EIS – Section 5; Engagement Outcomes Report – Appendix R; Submissions Report – Section 3.	The Applicant commits to continuing consultation with Registered Aboriginal Parties, relevant agencies and the community in accordance with the engagement approach

Submission issue	Response	Where addressed	Applicant Commitments
	and detailed in the Engagement Outcomes Report (Appendix R). Consultation was undertaken in accordance with the SEARs and the Department's <i>Undertaking Engagement Guidelines for State Significant Projects</i> (DPHI, 2024).		outlined in the EIS and Appendix R, as consolidated in Appendix B .
Impacts on biodiversity	Concerns were raised regarding potential impacts on biodiversity values. These matters were assessed in the Biodiversity Development Assessment Report (Appendix E), prepared in accordance with the Biodiversity Assessment Method (BAM). The BDAR has been updated to response to comments received by CPHR and to include the amended development footprint, identifying the extent of impacts, avoidance and minimisation measures, and offset requirements where applicable. Mitigation and offset commitments are consolidated in Appendix B .	EIS – Section 6; Biodiversity Development Assessment Report – Appendix E.	The Applicant commits to implementing biodiversity avoidance, minimisation and offset measures in accordance with Appendix B , consistent with the BDAR and statutory requirements.
Visual impacts	Visual impacts were assessed in the Visual Impact Assessment (Appendix I), which considered landscape character, key viewpoints and the effectiveness of proposed mitigation measures. The assessment concluded that visual impacts would be localised and manageable through project siting, design and mitigation measures.	Visual Impact Assessment – Appendix I.	The Applicant commits to implementing the visual mitigation measures outlined in Appendix B .
Decommissioning information	Some submissions raised concerns regarding the adequacy of information provided in relation to decommissioning and site rehabilitation. As outlined in the EIS, decommissioning would occur at the end of the operational life in accordance with a detailed Decommissioning Plan prepared prior to cessation of operations. The EIS identifies decommissioning principles to guide this process, with detail to be refined closer to the end of the project life, consistent with standard practice. Decommissioning commitments are consolidated in Appendix B .	EIS – Section 6; Mitigation Measures – Appendix B .	The Applicant commits to decommissioning and rehabilitating the site in accordance with the principles and mitigation measures set out in Appendix B , to facilitate the return of the land to agricultural use.

Submission issue	Response	Where addressed	Applicant Commitments
Noise impacts (construction and operation)	Noise impacts were assessed in the Noise Impact Assessment (Appendix J), which considered predicted noise levels, applicable criteria and mitigation measures. The assessment identified management measures to ensure compliance with relevant guidelines. Noise mitigation measures are consolidated in Appendix B .	Noise Impact Assessment – Appendix J.	The Applicant commits to implementing noise management and mitigation measures outlined in Appendix B .
Social impacts / community wellbeing	Broader concerns regarding social impacts and community wellbeing were raised. These matters were assessed in the Social Impact Assessment (Appendix O), which considered community perceptions, potential social effects and proposed management measures. Social impact management measures are consolidated in Appendix B .	Social Impact Assessment – Appendix O.	The Applicant commits to implementing social impact management measures outlined in Appendix B .

4.2 Agency submissions

Submissions by regulatory agencies are discussed in **Table 9**.

Table 9 - Agency submission summary and response

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
Bushfire and hazards	NSW Rural Fire Service	The NSW RFS advises that the development should comply with the following: > Section 6 Recommendations of the Bush Fire Assessment Report prepared by Peak Land Management version 3 dated 8/4/2025 > Design and siting in accordance with Section 5.2 Recommendations of Preliminary Hazard Analysis prepared by Riskon dated 15/5/2025. Further, that a Fire Management Plan is prepared that at minimum includes:	The Applicant commits to ensuring that the Finley BESS is designed, constructed and operated in a manner that appropriately manages bush fire risk and supports effective emergency response, consistent with NSW Rural Fire Service (RFS) advice, relevant guidelines and best practice. Specifically, the Applicant commits to the following: > Compliance with specialist recommendations, including:

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		> Ongoing bush fire fuel management within the site, > Site infrastructure plan, > Site access and internal road plan, > APZs and their continued maintenance, > Location of hazards (physical, chemical etc) that may impact on fire fighting operations, and Engagement with local RFS (NSW RFS District Office for the Southern Border Team, phone 02 6051 1511) is strongly recommended to ensure that proposed mitigative measures are fit for purpose and that there is a shared situational awareness of response requirements.	• Full implementation of Section 6 – Recommendations of the Bush Fire Assessment Report prepared by Peak Land Management (Version 3, dated 8 April 2025); and • Design, layout and siting of infrastructure in accordance with Section 5.2 – Recommendations of the Preliminary Hazard Analysis prepared by Riskon (dated 15 May 2025). > Preparation and implementation of a Fire Management Plan (FMP) prior to construction, to the satisfaction of the NSW RFS, which will be maintained for the life of the development. At a minimum, the Fire Management Plan will include: • Ongoing bush fire fuel management across the development site; • A site infrastructure plan identifying all project-related assets; • A site access and internal road plan demonstrating suitable access, turning areas and clearances for emergency vehicles; • Identification, establishment and ongoing maintenance of Asset Protection Zones (APZs) in accordance with Planning for Bush Fire Protection 2019 and the approved Bush Fire Assessment; and

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
			• Identification and mapping of hazards (including physical, chemical and operational hazards) that may affect fire-fighting operations, together with corresponding management and response measures. > Ongoing engagement with the NSW Rural Fire Service, including: • Consultation with the NSW RFS District Office – Southern Border Team during detailed design and prior to commencement of construction; and • Continued engagement during construction and operation to ensure emergency response arrangements remain fit for purpose and that there is a shared understanding of site-specific response requirements. Through the implementation of these measures, the Applicant commits to ensuring that bush fire risks associated with the project are managed to an acceptable level and that the development does not compromise the safety of fire-fighting personnel, surrounding land uses or the broader community. Updated mitigation measures are included in the list of updated mitigation measures provided at Appendix B.
Water	DCCEEW Group	1.0 Water supply, take and licensing 1.1 Recommendation — pre-determination The Department of Planning, Housing and Infrastructure (DPHI) should seek from the proponent the maximum	The project does not rely on groundwater as a planned or ongoing source of water supply for either construction or operation. An in-principle agreement has been secured with Berrigan Shire

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		annual volume of water take due to aquifer interference activities and demonstration of the ability to acquire sufficient water entitlement unless an exemption applies. Explanation Insufficient information has been provided to confirm the potential groundwater inflow volumes. Maximum excavation depths for this project are unclear, but likely shallow. However, NSW DCCEEW Water Group notes that groundwater could potentially be intercepted as the site is in an area of irrigated agriculture and potentially associated shallow water tables. The proponent has not presented sufficient information and analysis on excavation and groundwater levels, hence potential inflows during the construction and ongoing operation of the site. Quantification of maximum potential inflow volumes is required. 1.2 Recommendation — post approval DPHI should ensure the proponent acquires a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018. Explanation Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018 applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as:	Council for the supply of potable and non-potable water, which is intended to meet the project's anticipated water requirements during construction and operations. A copy of this is provided at Appendix C. Construction activities are limited to relatively shallow excavations, and the project does not include permanent below-ground structures that would ordinarily require dewatering. On this basis, groundwater interception is not anticipated as part of the approved construction methodology. Notwithstanding this, the Applicant acknowledges that the site is located within an irrigated agricultural area where shallow groundwater may be present. A PSI been prepared and is provided at Appendix J to confirm site conditions, establish baseline groundwater and soil information, and inform appropriate management should groundwater be unexpectedly encountered. The Applicant confirms that no groundwater take will occur without appropriate regulatory authorisation. If groundwater is intercepted during construction, volumes will be monitored and quantified. If groundwater take is proposed: > If groundwater is intercepted, a Water Access Licence (WAL) will be obtained prior to any water take occurring, unless an exemption under Clause 7 of Schedule 4 of the <i>Water Management (General) Regulation 2018</i> applies; and > Where an exemption applies, all statutory requirements will be met, including limits on

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		> the water is not taken for consumption or supply; > the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and > the records are kept for 5 years. Further information on these requirements and other information on licensing and approvals and exemptions, including a form to report and record water taken can be found at: https://water.dpie.nsw.gov.au/licensing-and-trade and Groundwater access licence exemptions NSW Government Water. 2.0 Groundwater impacts and dewatering requirements 2.1 Recommendation — pre-determination If the take of groundwater is found to be greater than 3 ML per year, DPHI should seek from the proponent an assessment of impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at: > https://water.dpie.nsw.gov.au/data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf > https://water.dpie.nsw.gov.au/data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf Explanation	annual take, record-keeping and reporting obligations. If groundwater interception is found to exceed 3 ML per water year, an Aquifer Interference Assessment will be prepared in accordance with the <i>NSW Aquifer Interference Policy</i> (2012) and the Aquifer Interference Assessment Framework, prior to continued groundwater take. Through the implementation of these mitigation measures, the project is not expected to result in adverse impacts to groundwater resources, surface water systems or surrounding irrigated agricultural land. Updated mitigation measures are included in the list of updated mitigation measures provided at Appendix B.

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		Although groundwater take is not anticipated to be significant, as per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. Although a comprehensive groundwater study prior to determination is unnecessary given the perceived low level of risk, NSW DCCEE Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.	
Traffic	Transport for NSW	Key Issue 1 - Traffic Impact Clarifications The worst-case scenario of both the AM and PM peaks of the development has not been adequately addressed. The project's impact on the state road network due to increased traffic volumes must be adequately considered. The proponent is to ensure discrepancies are corrected and to consider the worst-case scenario for both AM and PM peaks, including background traffic and turning volumes. TfNSW requires the following matters to be addressed in the response to submissions a) The following issues are required to be addressed relating to the traffic assessment and subsequent turn warrants provided: i. Section 4.3.1 of the TIA notes that the turn warrants assessment focuses on the AM peak. The reason given is that the AM peak is likely to generate the highest number of trips, which determines the intersection treatments. The turn warrant assessment is to be revised to include the PM peak hour traffic volumes for project traffic at peak of construction. The turn warrant assessments are to be prepared in accordance with section 3.25 of Part 6 of	Key Issue 1 – Traffic Impact Clarifications a) i. PM peak turn warrants (AGTM Part 6 s3.25) The Traffic Impact Assessment (TIA) has been revised to include turn warrant assessments for both the AM and PM peak hours for the peak construction scenario, prepared in accordance with Austroads Guide to Traffic Management Part 6 (AGTM6), section 3.25. The updated assessment applies a conservative “worst-case” assumption whereby the peak construction hour coincides with the background network peak hour, and confirms that the required treatments remain BAR/BAL for both peak periods. a) ii. Consistency of AM/PM peak selection for SIDRA vs turn warrants The TIA has been updated to align the AM and PM peak hour scenarios used for SIDRA modelling and the turn warrant assessment, applying the same “worst-case” background traffic period (Wednesday survey day, representing the highest recorded peak flows). This ensures that the SIDRA

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		the Austroads Guide to Traffic Management (see advisory note 6). ii. The AM and PM peaks identified in the SIDRA analysis differ from those used in the turn warrant assessment. The SIDRA analysis on page 4.3.4.1 indicates that the worst-case scenario using the Wednesday background traffic data was used, whilst in Section 3.6.1.2, an average was used across all days. It is essential to understand the AM and PM peaks, as they inform the worst-case scenario applied to the turn warrants. The TIA is to be revised to ensure that the SIDRA analysis and turn warrants assessment represent the same worst-case scenario for the AM and PM peak hours at the peak of construction. Key issue 2: Issues with utilising existing turn treatments The existing turn treatments are deficient. The proponent is to provide strategic concept designs demonstrating compliance with Austroads Guide to Road Design Part 4A. The project intersection strategic designs must be updated based on the outcome of the updated analysis and to ensure that the largest vehicles using the intersection can be accommodated within the pavement. TfNSW requires the following matters to be addressed in the response to submissions. a) Issue with using the existing Auxiliary Left Turn treatment (AUL)- Canalla Road/Riverina Highway The proposal intends to rely on the existing treatments at the intersection of Canalla Road/Riverina Highway. Review of the AUL(s) on Riverina Highway to facilitate a left turn does not comply with Austroads. It will not be able to cater for the increased traffic and design vehicles based on the existing deficiencies, as the AUL(s) does not	modelling and turn warrant outcomes are based on the same AM and PM peak definitions and are directly comparable for the peak construction assessment. The updated SIDRA outputs confirm Level of Service A in both AM and PM peak conditions and a low degree of saturation under the peak construction scenario. Key Issue 2 – Issues with utilising existing turn treatments a) AUL deficiency – Canalla Road / Riverina Highway The Applicant acknowledges TfNSW's advice that the existing AUL geometry and linemarking do not demonstrate compliance with current Austroads requirements. In response, the project has been refined to include intersection upgrade works at Riverina Highway / Canalla Road / Marantellis Road within the development footprint, and strategic concept designs have been prepared/updated to demonstrate compliance with Austroads Guide to Road Design Part 4A (and TfNSW requirements), including AUL/BAL geometry, line marking and associated pavement widening where required. b) BAR deficiency – Canalla Road / Riverina Highway The Applicant acknowledges TfNSW's advice regarding deficiencies with the existing BAR treatment and the potential for increased safety risk if non-compliances are not rectified. The intersection upgrade design has been updated to

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		comply with the length and width requirements for an AUL(s) and do not include sufficient arrow line markings. Strategic concept designs will be required for the upgrade of the deficient AUL(s) that demonstrate the scope of the upgrades needed for the AUL(s) to achieve compliance with Austroads. Refer to advisory notes for specific references to Austroads concerning this point. b) Issue with the existing Basic Right Turn treatment (BAR)- Canalla Road/Riverina Highway The Basic Right Turn treatment on Riverina Highway, which facilitates the right turn into Canalla Road, does not comply with Austroads. The increased traffic and proposed design vehicles will exacerbate the current safety issues with the non-compliant BAR. Strategic concept designs will be required to be submitted that demonstrate the scope of the upgrades necessary to the existing BAR to achieve compliance with Austroads and TfNSW requirements. The strategic concept designs will need to address the following specific non-compliances with the existing BAR: i. BAR does not meet the minimum requirement for the situation whereby a road user is not allowed to enter a dedicated left turn lane to pass / navigate around a stored vehicle turning right into the side road. The proponent must design a compliant BAR intersection treatment and line mark the edge line at a constant 3.5m from the centerline to provide a widened shoulder to satisfy the requirement of a BAR. (AGRD Part 4A – Section 7) The re-design will impact the existing treatments to Marantellis/Riverina Highway. The proponent in their re-design will therefore, need to consider what an appropriate BAR treatment is for both the Canalla and Marantellis Road intersections with the Riverina Highway	deliver a compliant BAR treatment consistent with AGRD Part 4A, including: > provision of an appropriate widened shoulder / edge line offset to support BAR operation and bypass behaviour consistent with Austroads intent; and > linemarking updates to ensure the treatment functions as intended. The design also recognises the interaction between the Canalla Road and Marantellis Road intersections and will provide an integrated solution that addresses both approaches. i. Bypass / widened shoulder requirement and interaction with Marantellis Road The strategic concept design will demonstrate a compliant BAR arrangement with edge line and shoulder widening (constant offset where required) so that a through vehicle is not forced into an unsafe manoeuvre around a stored right-turning vehicle. Given the unconventional staggered layout, the design will consider the appropriate treatment for both Canalla Road and Marantellis Road, including whether an upgraded configuration (e.g. opposing CHR treatments) is warranted based on the updated analysis and design constraints. ii. Hold line setback The strategic concept design will include compliant hold line placement and setback on the side road approaches, consistent with Austroads requirements (including Figure 7.1 principles), to

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		and ensure both roads have compliant treatments. Consideration to upgrading the intersection with opposing CHR's should be given by the proponent due to the unconventional existing intersection design. ii. A hold line is to be included set back from the through edge line to hold side road traffic free of the widened shoulder to ensure the BAR intersection treatment will operate as intended. Austroads Figure 7.1 demonstrates requirements for a compliant hold line setback. The setback should take into consideration the unconventional design of the road. c) Road Train width requirement The Riverina Highway is a gazetted Road Train route (i.e B-triples) at this location. The strategic concept designs are to demonstrate an increase of the width of the AUL(S) and BAR for the Canalla Road/Riverina Highway intersection to accommodate the road train heavy vehicles passing the turning project traffic. See advisory note for references to Austroads. d) Swept Paths Swept paths are required to be provided for the largest heavy vehicle and high-risk OSOM configuration (corresponding to the design and check vehicle) required to use each intersection, access point or navigate pinch points along the high-risk OSOM routes. This must be prepared following Austroads Design Vehicles and Turning Path Templates. e) Consideration of bus bays The proponent is to demonstrate a safe and conforming solution for the intersection upgrades that take into consideration the existing bus bays. The proponent is to be aware, that if modifications to the bus bays are	maintain a clear widened shoulder / bypass area and ensure BAR operation is not compromised. c) Road train width requirement (gazetted Road Train route) The Applicant acknowledges that Riverina Highway at this location forms part of a gazetted Road Train route. The strategic concept design for the upgraded intersection will explicitly demonstrate that AUL/BAR/BAL elements (including lane widths and shoulder treatments) appropriately accommodate road trains passing turning project traffic, consistent with Austroads and TfNSW requirements. The upgraded BAL/BAR configuration will be designed to accommodate road train through-movements passing turning project vehicles in accordance with Austroads Part 4A. d) Swept paths (largest HV and high-risk OSOM) Swept path analyses are provided for: > the largest construction heavy vehicle expected at the intersection and site access points; and > the high-risk OSOM configuration required for delivery of the largest component (e.g. transformer), prepared using Austroads Design Vehicles and Turning Path Templates, and demonstrating that turning movements and any required lane utilisation can be safely managed at any identified pinch points. e) Consideration of bus bays

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		required to achieve an optimal design, consultation will need to occur. Consideration of relocating the bus bays to allow for an improved, optimized design, should be given. There is potential for a rear end type crash when the bus bay is in use, as there appears to be insufficient offset between the intersection treatment and the bay. Line marking the edge line through at a constant offset should also be considered. f) Broockmanns Road consideration The proposal also intends to use Broockmanns Road for a proportion of vehicle traffic. The route vehicles will take to access Broockmanns Road is to be identified and further traffic assessments and turn warrants are required for the Will Hamilton St/Riverina Highway intersection, if these intersections are proposed to be used by project traffic. Key Issue 3 - Staging and pre-construction minor works Staging/timing of pre-construction minor works/enabling works requires clarification. The updated TIA needs to quantify the traffic volumes, timeframes, and routes (same or different from construction), as well as mitigation measures (e.g., TTM, current traffic conditions) and flow-on impacts for all stages. TfNSW requires the following matters to be addressed in the response to submissions a) As required by the Secretary's Environmental Assessment Requirements (SEARs) response, the proponent is to provide a separate analysis of pre-construction minor works to the construction analysis. This should include the list of requirements provided by the SEARs, including: i. Identification of the traffic volumes and traffic types, inclusive of the largest design vehicle, including those	> Preliminary intersection upgrades concept plans discussed with TfNSW included the retention of bus bays. The Applicant will review the need for modification or relocation of existing bus bays at the detailed design (Works Authorisation Deed – WAD) stage, in consultation with Transport for NSW, to confirm whether the bus bays are required to be retained, modified or relocated as part of the intersection upgrade works. Where TfNSW confirms that bus bays are required, the Applicant will ensure that the final intersection design appropriately integrates the bus bays and addresses safety considerations, including rear-end crash risk, offsets from turning treatments and compliant linemarking, in accordance with Austroads and TfNSW requirements. > Where TfNSW confirms that bus bays are not required, the Applicant will proceed with a compliant intersection design that removes or rationalises the bus bays as appropriate, subject to TfNSW approval. f) Broockmanns Road consideration (route identification / Will Hamilton St intersection) The Applicant is not including the Broockmanns Road / Will Hamilton St intersection as part of the OSOM Route or as a light vehicle route to the development site. Key Issue 3 – Staging and pre-construction minor works / enabling works

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		specifically in the AM/PM peak hours. Swept path analysis is required for the existing intersection if concurrent turning movements for the design heavy vehicle are intended at this intersection during the pre-construction minor works phase. ii. Identification of any measures proposed to reduce the project traffic and impacts during this period, i.e carpooling, shuttle buses, staggering of traffic and inclusion of enforceable mitigation measures that can be monitored for compliance. iii. Provide a schedule of the proposed pre-construction minor works and program of works. Identifying the hours for pre-construction minor works. iv. Assess any overlap of construction and pre-construction minor works periods must be included in the traffic assessment for this stage, before completion of the intersection upgrade. Key Issue 4 – The high-risk OSOM route assessment scope and mitigation measures The high-risk oversized overmass (OSOM) vehicle route assessment does not fully consider impacts to the state road network across all identified routes. Further detail regarding these impacts is requested to ensure the compliance of the road upgrades and mitigation measures in accordance with the Austroads Guide to Road Design, the Austroads Guide to Temporary Traffic Management, and TfNSW requirements. TfNSW requires the following matters to be addressed in the response to submissions a) This section provides overall considerations for the route from the Port of Melbourne which will need to be resolved within the revised TIA.	a) Separate pre-construction minor works assessment (SEARs) A separate assessment of pre-construction minor works has been included, distinct from the main construction traffic assessment, consistent with the SEARs. i. The updated TIA assesses pre-construction minor works as a discrete phase and confirms that: > traffic volumes generated during pre-construction minor works will not exceed peak traffic volumes identified for the main construction phase as outlined in Section 4.1.5 of the TIA; > no OSOM vehicle movements are proposed during the pre-construction minor works phase; > traffic during this phase will comprise light vehicles and a limited number of standard heavy vehicles only; > temporary traffic controls at State road intersections are proposed during pre-construction minor works during the upgrade of Riverina Highway / Canalla Road / Marantellis Road intersection, subject to approval from TfNSW. All mitigation measures identified in the TIA for construction traffic management will also apply to the pre-construction minor works phase, including driver behaviour controls, routing restrictions, staging requirements and monitoring provisions.

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		i. NHVR Route ID has not been provided. This is required to ensure a complete assessment of route considerations has been provided. See advisory note 4. ii. The route assessment identifies heavy-massed and large-axle group load vehicles. Bridge and culvert assessments are required for TfNSW assets to assess their suitability for use of these vehicle types. The proponent is to contact TfNSW Special Permits Unit (see advisory note 7). The route assessment is to be revised based on the outcomes of the TfNSW bridge and culvert assessments. iii. The route study provided by ARES noted that the exact weights and dimensions of the Transformer are yet to be finalised, with guide dimensions offered. The maximum dimensions are to be provided in the updated route study. iv. Pinch point 17 demonstrates that to make the turn into Canalla Road from the Riverina Highway, the high-risk OSOM will be entering into the opposing lanes. This will require traffic to be stopped; however, sufficient detail on how this will occur is not provided. The updated information will need to clarify how long traffic will be stopped (TfNSW notes traffic cannot be stopped for more than 10 minutes). Please include this detail in the updated TIA and ensure any other locations where traffic is required to be stopped are provided. v. The route study demonstrates that medians will be tracked over, including at the intersection of the Newell Highway and Riverina Highway. See figure 1 within Attachment B. The proponent is to investigate whether the high-risk OSOM can avoid tracking over any medians or other infrastructure on the state road network.	ii. Measures to reduce traffic and impacts (enforceable) The Applicant will implement traffic minimisation measures where practicable (e.g. carpooling, workforce parking management, staggered start/finish times, and use of shuttles where required), supported through enforceable requirements in the Traffic Management Plan (TMP) and site induction processes. A draft TMP is provided in Appendix E of the updated TIA. iii. Schedule and hours for pre-construction works A program of pre-construction minor works is outlined in Section 4.1.5 of the updated TIA provided in Appendix G. All pre-construction works will be carried out within the standard construction hours being 7 am to 6 pm Monday to Friday, 8 am to 1 pm Saturdays and at no time on Sundays or public holidays. iv. Overlap with construction and operation prior to intersection upgrade completion All proposed road and intersection upgrades, including at the proposed site access at Riverina Highway to Canalla Road Broockmanns Road will be completed concurrently with pre-construction minor works. Key Issue 4 – High-risk OSOM route assessment scope and mitigation measures a) Route from Port of Melbourne – assessment refinements i. NHVR Route ID: 2P2U5-3 v1

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		vi. Strategic concept designs will be required for works required along the state road network (for example, the median identified in e) that identify the scope of the works that would be necessary to ensure the asset could be made suitable for traversing (i.e pavement strengthening) or temporary removal. vii. Temporary changes to state road assets will need to include the length of time they will be affected, any interim treatments (e.g., line marking), and when and what will replace the asset post-completion of high-risk OSOM movement. viii. Signs are proposed to be removed at the Riverina Highway / Newell Highway. Details on any temporary signage and the timeframe for replacing traffic signs are to be included. ix. An extensive review of the high-risk OSOM routes regarding vertical and horizontal obstructions alignment, including existing formations, crossings, bridges, culverts, intersection roadside furniture, hazards, roundabouts, traffic signals, level crossings, existing developments, signage and powerlines. x. The route assessment does not include relevant TfNSW projects or other third-party projects that are currently under construction, or will be completed, on the State road network for the route. The route assessment must be updated to include mitigation measures or modifications required to navigate any identified road or rail projects along the routes (ie, Council works for Finley Main St project expected to commence in the financial year 25/26, see figure in Attachment B for location of works).	The updated OSOM Route Study includes the relevant NHVR Route ID: 2P2U5-3 v1 to support traceability of the route assessment. ii. Bridge and culvert assessments (TfNSW assets) The Applicant acknowledges that bridge/culvert assessments are required for TfNSW assets where heavy-massed and large axle group loads are proposed. The Applicant has consulted with TfNSW's to obtain bridge and culvert assessment (PT3030) for the OSOM configuration. iii. Final maximum dimensions and weights The updated OSOM Route Study has been updated to include the maximum anticipated weights and dimensions for the governing OSOM load associated with delivery of the main transformer. For the purposes of route assessment and infrastructure verification, the following maximum dimensions and masses have been adopted: Transformer (cargo): > Length: 8.0 metres > Width: 3.0 metres > Height: 4.0 metres > Weight: 129.4 tonnes Transport configuration (including trailer): > Vehicle configuration: Prime mover with platform trailer, dolly and hydraulic gooseneck;

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		xi. The pull-over bays and rest areas have been identified with swept paths; however, the diagrams provided aren't fully dimensioned as required. See advisory note 1 and 5. xii. Rail requirements are to be considered. See advisory note 9 and 10.	> Overall length 36.0 metres (excluding rear push truck, if required); > Overall width: 4.2 metres; > Overall height: 5.1 metres; > Gross Combination Mass (GCM): 210 tonnes; > Maximum axle load: 15.5 tonnes per axle. These dimensions represent the maximum envelope used to assess route geometry, swept paths, bridge capacity, pavement loading and clearance constraints. The trailer configuration allows for hydraulic lowering of approximately 200 mm, providing additional clearance where required. The transformer load is classified as a High Risk OSOM load by TfNSW due to its weight. An OSOM Transport Management Plan (TMP), incorporating final confirmed dimensions and weights, will be prepared to the satisfaction of TfNSW and NHVR prior to transport. No OSOM movements will occur without all required permits and approvals being in place. iv. Pinch point 17 – traffic stoppage (≤ 10 minutes) and other stoppage locations The updated OSOM assessment confirms that stoppages at PP17 will be managed so that traffic is not stopped for more than 10 minutes, consistent with TfNSW advice. Anticipated Estimated time to negotiate this pinch point is up to 2 minutes including establishment of traffic control.

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			v. Avoid tracking over medians / state road infrastructure where feasible The Applicant has investigated refinements to the OSOM configuration and/or route controls to avoid tracking over medians and other State road infrastructure where practicable. At PP5, intersection has recently been upgraded as part of the West Gate Tunnel Project with new traffic light infrastructure and concrete traffic islands. To avoid the traffic lights, the load will need to contraflow the eastbound slip lane on Simcock Ave, crossing over the median on Hyde St to do so, this movement will be subject to consultation and permits with NHVR and VicRoads. vi. Strategic concept designs for state road works (e.g. pavement strengthening / temporary removal) Where OSOM movements required to interact with State road assets (e.g. traversing the median at PP5 and PP7, temporary removal of a sign at PP7), strategic concept designs will be prepared to define the scope of works required to make assets suitable for the movement including any strengthening, temporary works and reinstatement subject to the approval of the roads authority prior to OSOM movement. vii. Temporary changes – duration, interim treatments, reinstatement For any application for temporary modifications to State road assets, the updated documentation supplied with the OSOM permits required will specify:

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			> the duration of impact; > interim treatments (e.g. temporary line marking, traffic control); and > reinstatement requirements and timeframes post-movement. Temporary modifications are anticipated to be limited to PP5 and PP7 (medians) and temporary removal of a sign at PP7. An OSOM TMP that will be submitted to the satisfaction of NHVR by the transporter prior to trip commencement. viii. Temporary signage and sign replacement timeframes One sign at PP7 is required to be temporarily removed to facilitate the OSOM movement, once the movement is complete the sign will be reinstated. An OSOM TMP that will be submitted to the satisfaction of NHVR by the transporter prior to trip commencement. ix. Comprehensive review of obstructions and constraints The updated OSOM Route Study has taken into account the vertical and horizontal constraints and relevant assets (bridges, culverts, crossings, roadside furniture, hazards, roundabouts, rail interfaces, utilities and powerlines), and has identified any required mitigation measures and consultation. x. Other projects and works along the route (incl. Finley Main St works) The route assessment will be updated to include relevant third-party road/rail projects and council

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			works that may affect OSOM movements, including the identification of mitigation measures or route modifications required to navigate such works. Noting the Newell Highway works in Finley commenced in Q4 2025, and are scheduled for completed prior to commencement of the project. These works are not anticipated to constrain the OSOM assessed route; however any other future scheduled works (including Council projects) will be accounted for in the timing of OSOM transport, in consultation with relevant regulatory authorities prior to any movement commencing. xi. Pull-over bays and rest areas – fully dimensioned swept paths The updated OSOM provides fully dimensioned swept path diagrams for nominated rest stops, including swept path analysis of each rest stop including ingress/egress. No modification are required to complete these movements. xii. Rail requirements Two rail level crossings along the route as detailed on the previous page. There is also a non-operational rail corridor crossing at Tocumwal which is part of the Country Rail Network (CRN). Permissions will be required from rail authorities to travel through these crossings. Approvals may also be required when travelling over railway lines on bridges. The applicant will submit the request at least two (2) months before passage and include the specifications of the OSOM movement to via the National Heavy Vehicle portal, or directly to UGLRL via heavyvehicle@uglregionallinx.com.au.

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N/A	Mining, Exploration and Geoscience	NSW Resources has reviewed the information supplied in relation to the Project and based on the review has no specific comments in relation to <i>Mining Act 1992</i> considerations and raises no issues regarding the Project at this stage.	Noted.
Fire Safety	Fire and Rescue NSW	1. Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.2² and submitted to FRNSW for review. > The FSS is to be used to inform the design and as such it is FRNSW Position³ 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 should be prepared consistent with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations⁴. 2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1⁵. 3. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans⁶.	The Applicant acknowledges Fire and Rescue NSW's advice and commits to the preparation, submission and implementation of all fire safety documentation requested, in accordance with the relevant NSW Government and FRNSW guidelines, as detailed below. Fire Safety Study (FSS) Prior to commencement of construction, the Applicant will prepare a Fire Safety Study (FSS) in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2². The FSS will: > Be prepared to the satisfaction of Fire and Rescue NSW; > Be submitted to FRNSW for review prior to any further fire safety submissions; > Inform the detailed design of the project; and > Be prepared consistent with FRNSW Fire Safety Guideline – Technical Information: Large-scale external lithium-ion battery energy storage systems – Fire safety study considerations. The FSS will include, as applicable: > An Initial Fire Safety Report (IFSR); and

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			> A Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). Emergency Plan (EP) Prior to occupation or commissioning of the Finley BESS, the Applicant will prepare an Emergency Plan (EP) for the site in accordance with the requirements of HIPAP No.15. The Emergency Plan will address: > Site-specific fire and emergency scenarios; > Incident management, notification and response procedures; and > Coordination with relevant emergency service agencies. Emergency Services Information Package (ESIP) Prior to occupation or commissioning, the Applicant will prepare an Emergency Services Information Package (ESIP) in accordance with the FRNSW Fire Safety Guideline – Emergency Services Information Package and Tactical Fire Plans. The ESIP will be provided to FRNSW and will include all information necessary to support emergency response and tactical fire planning for the site. The Applicant further commits to ongoing consultation with Fire and Rescue NSW during the preparation of the above documentation to ensure that all fire safety measures are fit-for-purpose and aligned with emergency response requirements.

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Operational life of the project Traffic Employment Vegetation screening	Berrigan Shire Council	> It confirms a lifespan of 20-25 years. It is important for any consent issued / the community to know whether it is 20 or 25 or somewhere in between. It will provide certainty on when the consent will lapse and when remedial work will commence. > Site Access and vehicle types. Page 15 talks about heavy vehicle accessing the site from Canalla Road; Transgrid vehicles and light vehicles using Broockmanns Road; however we can't find any design details. It is acknowledged that these are discussed on page 80 of the FINLEY BESS though, and considered satisfactory. Impact on Council roads and infrastructure is an important consideration. > Page 16 and 102 (workforce) encourages local employment, advertising locally and sourcing material locally where possible. This is fully supported. > No specific screening details have been provided (such as vegetation species, height at maturity, density, etc). Can these details please be included.	> The Applicant confirms the operational life of the project is up to 25 years from commencement of operations. This represents the maximum design life of the project. Decommissioning and site rehabilitation will commence following cessation of operations unless further approval is obtained, in accordance with the conditions of consent. > Site access arrangements and vehicle types are detailed in the EIS and TIA. Heavy vehicles will only access the site via Canalla Road at the request of Council. Light vehicles and Transgrid vehicles will access the site via Broockmanns Road. Impacts on Council-roads will be subject to implementation of mitigation measures, preparation of a Construction Traffic Management Plan (CEMP), and compliance with pre and post development dilapidation reports, to Council's satisfaction. > The Applicant supports Council's position and commits to advertising employment locally, engaging local contractors where practicable, and sourcing materials locally where feasible, subject to technical and commercial requirements. > Vegetation screening will be planted at 1.5 m high, in two (2) staggered rows of fast-growing native tree species capable of achieving a mature height of not less than three 3 m high, located around the perimeter

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			security fencing to minimise residual visual impacts and to integrate the development into the surrounding landscape. The Applicant will engage with Council regarding suitable vegetation plantings endemic to the region.
N/A	Crown Lands	No Crown land, roads, or waterways are contained within the project footprint. Furthermore, no Crown land, roads, or waterways are adjacent to the project site in this instance. Accordingly, Crown Lands has no further comments on this project. Note that project boundaries be amended to include any Crown land, roads, or waterways, further advice from Crown Lands should be sought	Noted. Should the development site be amended in future, further advice will be sought from Crown Lands.
Biosecurity	The Department of Primary Industries and Regional Development Agriculture	The Department has reviewed the EIS and associated documents for how they have considered and addressed the potential impact of the proposed development on agricultural land and agricultural production in the locality. It is noted that an Agricultural Impact Assessment and a Land Use Conflict Risk Assessment (LUCRA) have been completed. However the range of comments within the documents regard agricultural biosecurity and site decommissioning and rehabilitation are confusing. There should be a specific commitment for removal of all above and below ground infrastructure upon decommissioning to ensure the potential for irrigated cropping is reinstated. Similarly there should be a specific commitment for the development and ongoing implementation of agricultural biosecurity plans for construction and operation,	The Applicant commits to preparing and implementing a Biosecurity Management Plan as part of the Construction Environmental Management Plan (CEMP), with measures to be maintained throughout construction and operation. The Biosecurity Management Plan will be developed in consultation with the landowner and Local Land Services and will include, but not be limited to: > Inspection, wash-down and certification protocols for plant, vehicles and equipment entering or moving within the site; > Decontamination procedures to prevent the introduction or spread of weeds, pests and plant or animal diseases; and

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		developed in consultation with the landowner and Local Land Services.	> Ongoing site management and monitoring measures to minimise biosecurity risks to adjoining agricultural land. In addition, the Applicant explicitly commits that upon decommissioning, all project infrastructure will be fully removed, including all above-ground and below-ground infrastructure, in accordance with agreements with the landowner and conditions of consent. The site will be rehabilitated to a condition suitable for the reinstatement of irrigated agricultural cropping, subject to landowner requirements. These commitments provide clarity and certainty regarding long-term land use outcomes and ensure that the proposed development does not result in permanent constraints on agricultural production in the locality. Updated mitigation measures are included in the list of updated mitigation measures provided at Appendix B
N/A	Water NSW	WaterNSW has reviewed the EIS and found that the proposal is not located near any WaterNSW land, assets or infrastructure. Therefore, we have no comments or requirements regarding the proposal. We do note the pre EIS consultation on the matter by Premise, where no specific issues were raised at the time.	Noted. Should the development site be amended in future, further advice will be sought from Water NSW.
Flood	NSW State Emergency Service (SES)	> Note the site and surrounding access roads are completely inundated in a 1% AEP event, with flood depths up to 0.5 metres in the pre-development scenario 2 and between 0.5 - 1 metres in some isolated areas of the site in post-development	The Applicant acknowledges the advice of NSW State Emergency Service (SES). In response, a standalone Flood Impact Assessment (FIA) has been prepared and is provided at Appendix H . The FIA has been prepared in accordance with

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		scenario³. However, more frequent or rarer events were not modelled to understand the full extent of the flood risks to life and property at the site, for example if the site becomes isolated prior to complete inundation. > Recommend the flood impact assessment, prepared in accordance with the Flood Risk Management Guideline LU01 – Flood Impact and Risk Assessment, should include consideration of: • flood risks at the site and access/egress roads (including any internal roads and the broader road network) from the full range of flooding events, up to and including the PMF event. • any risk of isolation and the duration of inundation. The impact of flooding on the roadways should go beyond immediately adjacent to the site to fully understand any evacuation constraints and ensure that people are able to evacuate the site to a safe area above the PMF level, before complete inundation of the site occurring. This is particularly important as this is a flash flood environment. Evacuation must not require people to drive or walk through flood water. • climate change impacts, in line with NSW Government guidelines. > Note there are several other proposed BESS projects in Finley, with two proposed BESS sites and the operational Finley Solar Farm located adjacent to the subject site⁴. We recommend considering cumulative impacts of the proposed developments on the flood behaviour in this area, particularly considering the	Flood Risk Management Guideline LU01 – Flood Impact and Risk Assessment and relevant NSW Government guidance. The FIA has: > Assessed flood behaviour and flood risk across the full range of flood events, including more frequent events, the 1% AEP event, rarer events and Probable Maximum Flood (PMF) conditions; > Evaluated flood risks to the development site, internal access roads, external access and egress routes, and the surrounding road network, including the potential for site isolation, timing of inundation, and duration of flood impacts; > Identified evacuation constraints and demonstrated that evacuation can occur prior to site isolation, without requiring personnel to drive or walk through floodwaters, recognising the flash flood characteristics of the locality; > Considered climate change impacts on flood behaviour, consistent with NSW Government climate change guidance; > Assessed cumulative flood impacts associated with nearby existing and proposed developments, including other BESS projects and the operational Finley Solar Farm, with particular regard to changes in impervious surfaces and floodplain behaviour; > Included updated post-development modelling to assess potential afflux both

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		increase in impervious surfaces through the construction of hardstand areas, paved internal roads, etc⁵. > Recommend seeking advice from the Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour at the site and for adjacent and downstream areas, understanding that the post-development modelling scenario shows development results in an afflux both offsite and onsite (in excess of 0.25 metres) in a 1% AEP event⁶, noting that no other event magnitudes were modelled. > Recommend considering flood resilience of the infrastructure, which is likely to be damaged or contaminated by flood water, to events up to and including the PMF. This could include placing any sensitive infrastructure such as battery storage, inverters, etc., above the PMF level, if feasible, to minimize risk to property and financial losses. > Recommend considering site design and stormwater management that reduces the impact of flooding and minimises any risk to site users and the community.	onsite and offsite across relevant flood events, and incorporated consultation outcomes with DCCEEW Water Group where applicable; and > Assessed the flood resilience of infrastructure, including consideration of siting and design measures to minimise flood damage, contamination risk and recovery time for critical components, for events up to and including the PMF where feasible. The findings of the FIA have informed site layout, finished levels, stormwater management measures and operational protocols, ensuring that flood risks to site users, emergency responders and the surrounding community are appropriately avoided or minimised. Localised variations in flood behaviour are confined to the immediate vicinity of the raised BESS infrastructure footprints and internal drainage paths; however, these changes do not result in adverse impacts on flood conveyance, flood storage, or flood risk to surrounding land. Peak flow analysis confirms that flows within the broader catchment and along key overland flow paths remain effectively unchanged under post-development conditions. Updated mitigation measures are included in the list of updated mitigation measures provided at Appendix B.
Aboriginal Cultural Heritage	Heritage NSW ACH	The Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared with reference to the relevant guidelines as required by the Secretary's Environmental	Noted. The Applicant commits to implementing mitigation measures outline in Sections 13 and 14

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		Assessment Requirements (SEARs). The ACHAR outlines that no Aboriginal objects or areas of archaeological potential were identified within the study area and that no Aboriginal cultural heritage values will be impacted by the proposal. Heritage NSW agrees with the proposed management measures and recommendations (Sections 13 and 14 of the ACHAR). Heritage NSW has provided recommendations in relation to Draft Conditions of Consent. as included in Attachment A.	of the ACHAR and mitigation measures provided at Appendix B .
Flood and Biodiversity	DCCEEW CPHR	Flood Risk Management - The WIA needs to assess the 5%, 0.5%, 0.2% AEP and Probable Maximum Flood (PMF) events - Complete additional modelling to assess the impact of the 5%, 0.5%, 0.2% AEP and PMF flood events on the site, and the impact of the proposed site conditions on flood behaviour. - Utilise the 0.5% and 0.2% AEP events as proxies for assessing the impact of climate change. - The WIA needs to assess whether there will be detrimental increases in flood affectation of other properties and/or assets off-site - Conduct further assessment to adequately define any detrimental increases in flood affectation of off-site properties and/or assets. - Where detrimental increases in flood affectation are identified the proponent should describe how the risk will be mitigated. - The description of the hydrologic analysis and hydraulic modelling provided in the WIA requires review	Flood Risk Management - Assessment of additional flood events A standalone Flood Impact Assessment (FIA) has been prepared and is provided at Appendix H assessing flood behaviour for the 5%, 1%, 0.5%, 0.2% AEP and Probable Maximum Flood (PMF) events under existing and post-development conditions. Additional hydraulic modelling was undertaken as part of the FIA to assess the impact of the proposed development site on flood behaviour across the full range of flood events. Consistent with NSW Government guidance, the 0.5% and 0.2% AEP events were adopted as proxies for climate change sensitivity testing within the FIA. - Off-site flood affectation The FIA assessed potential changes to flood affectation of surrounding properties and assets. The assessment demonstrated that the project does not result in unacceptable off-site flood impacts. The FIA evaluated changes in flood levels, extent and velocity beyond the development site for all assessed events, including cumulative

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		3.1. Review, for accuracy, the data presented in the WIA used to inform the hydrologic analysis and clearly define the final IL and CL values adopted. 3.2. Incorporate the detailed design of the project into the hydraulic model to accurately investigate the impact of the proposed site conditions on flood behaviour OR provide additional detail to describe the representation of the proposed site conditions in the post-development scenario. 4. The WIA needs to map the hydraulic (flood function) categories 4.1. Define and map the flood function categories for both the existing and post- development scenarios. 4.2. Demonstrate the compatibility of the proposed site conditions with the flood function of the land. 5. The WIA needs to demonstrate how emergency management matters have been discussed with the Berrigan Shire Council and NSW State Emergency Services (SES) 5.1. Actively engage with the Berrigan Shire Council and NSW SES to demonstrate that emergency management matters have been discussed and, where applicable, supported. Biodiversity 6. Construction footprint indicating clearing associated with temporary/ancillary facilities needs to be provided 6.1. Revise Section 1.1.3 to include all construction impacts as described in the EIS Section 3.2. Provide a map clearly differentiating existing and proposed infrastructure.	considerations. Where localised changes were identified, appropriate mitigation measures were incorporated into the site design and stormwater management strategy to avoid adverse impacts. 3. Hydrologic and hydraulic modelling methodology The hydrologic analysis and hydraulic modelling approach was reviewed and refined within the FIA to ensure consistency, accuracy and alignment with current best practice guidance. Key modelling inputs, including rainfall losses and design parameters, were reviewed and clearly documented within the FIA. The proposed development layout, including hardstand areas, internal access roads and drainage infrastructure, was incorporated into the post-development flood modelling scenario. 4. Flood function mapping Flood function categories (floodway, flood storage and flood fringe) were defined and mapped for both existing and post-development scenarios within the FIA. The FIA demonstrated that the proposed development is compatible with the flood function of the land and does not obstruct critical flood conveyance or storage areas. 5. Emergency management and evacuation Emergency management considerations, including flood risk, evacuation feasibility and site access during flood events, were assessed through the FIA, informed by consultation with Berrigan Shire Council and NSW SES. Flood emergency management matters were discussed with relevant

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		6.2. Provide a map showing the location of construction compounds (and security fencing), laydown areas, light and heavy vehicle parking and site office. 7. Avoidance and minimisation of impacts on native vegetation need to be clearly demonstrated 7.1. Demonstrate that impacts to threatened ecological communities have been avoided by revising the development layout to locate the development footprint, including ancillary facilities, in areas lacking biodiversity values. Update the BDAR and BAM-C accordingly. 8. Justify Plant Community Types (PCTs) selection using dominant native species recorded in BAM plots and their relative abundance 8.1. Revise section 4.2.2 of the BDAR to consider other possible PCTs present on the subject land, such as grassland PCTs 44, 45 and 46. Justify final PCT selection from this list using dominant native species recorded in BAM plots and their relative abundance as per BAM Section 4.2.1(3). Describe how the subject land matches PCTs as described in the BioNet Vegetation Classification. 8.2. Provide any additional evidence relied upon for PCT selection for derived vegetation zones, such as observations of remnant canopy species from adjoining areas with similar geophysical characteristics. 8.3. Check species identification on data sheets and revise BDAR sections 4.2 - 4.5 to be consistent with any corrected floristic plot data and site observations. If required, revise VI scores in BAM-C and throughout the BDAR 8.4. Following confirmation of the PCTs present on the subject land, review sections 4.2.2 and 4.3 of the BDAR to ensure any associated threatened ecological community	authorities, and the outcomes informed the flood risk and evacuation assessment documented in the FIA. Biodiversity 6. Figure 3 shows that all of the temporary ancillary facilities (construction compound, laydown areas, site office, car park) occur within the BESS compound to be located north of Brockmanns Road on Category 1 – exempt land. Figure 3 distinguishes between existing and proposed infrastructure. The subject land covers the land surrounding the substation as an underground electricity connection must be made between the existing substation and the proposed BESS. A large area has been included as the subject land for this BDAR as a conservative measure to allow for the possibility that the connection point will need to be changed. The only disturbance of ground will be at the entry and exit point, and places where the drill has to change direction. The disturbance is estimated to be approximately 10 m² and will be temporary. 7. The proposed BESS and all ancillary infrastructure has been deliberately located on Category 1 – Exempt Land to avoid the need to disturb the threatened ecological community. There is one scattered tree (<i>Eucalyptus microcarpa</i>) to the north of the subject land that was excluded to during the project design to avoid impacts. All temporary/ancillary infrastructure such as construction compound, laydown areas

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		aligns with the selected PCT(s). If required, update the BAM-C to reflect the results of PCT selection. 9. Revise patch size class for Vegetation Zone 3 9.1. Revise the patch size class for VZ 3 and ensure the BAM-C and BDAR are consistent. 10. Exclusion of some ecosystem credit species requires further justification 10.1. Revise all ecosystem credit species removed from further assessment in accordance with Section 5.2.2(2) of the BAM. Update relevant sections of the BDAR, including Table 10, and BAM-C to include any species identified as requiring assessment. 11. Additional surveys are required for Slender Darling Pea (<i>Swainsona murrayana</i>) 11.1. Provide evidence that conditions during targeted surveys were suitable for identifying the species if it were present on site. Alternatively, conduct a targeted threatened flora survey for Slender Darling Pea in accordance with Surveying threatened plants and their habitats (DPIE 2020) in the nominated survey period, or, assume presence if surveys are not possible. 11.2. Update the BAM-C and BDAR sections 5.1.2, 5.3 and 11 (if relevant), to reflect the results of the survey or presumption of presence. 12. Evidence should be provided to distinguish Common Eastern Froglet (<i>Crinia signifera</i>) from Sloane's Froglet (<i>Crinia sloanei</i>) 12.1. Provide additional evidence to demonstrate how the presence of Sloane's Froglet was ruled out.	and car parks, will be located within the BESS compound on Category 1 – Exempt Land. The only disturbance to native vegetation (threatened ecological community) will be for the connection of the proposed BESS to the existing substation, which cannot be avoided due to the purpose of the project to provide electricity storage. To reduce the potential impact to the threatened ecological community, the connection is proposed via underbore technology. The only disturbance to the ground layer will occur at the entry point of the drill, at changes to direction and the exit point, which equates to approximately 10 m² ie 0.001 ha. 8. Section 4.2 has been rewritten. PCT 76 was adopted as the most suitable Plant Community Type due to the presence of remnant trees, <i>Eucalyptus microcarpa</i> in the immediate surrounds, the soil type, dominant species and presence of PCT 76 in the area as identified on the State Vegetation Type Map. The PCT justification table has been updated and is provided as Attachment A to this memo. PCT 44, 45 and 46 were not considered suitable. There was no <i>Austrostipa aristiglumis</i> or <i>Austrostipa nodosa</i> recorded on the subject land and the presence of remnant trees on all sides of the subject land makes the classification as a natural grassland unsuitable. Although Curly Windmill Grass and Ringed Wallaby Grass were recorded on the subject land, and are characteristic of PCT 44 (and to a lesser degree 45 and 46), it is more likely that the area was once a grassy woodland, as

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		13. Indirect impacts to native vegetation during construction and operational phases requires further assessment 13.1. Provide the location and required maintenance for the proposed security fencing and any likely impacts not already considered. 13.2. Include consideration of, and mitigation measures to indirect impacts on adjacent native vegetation and habitat do not occur due to the installation and ongoing maintenance of security fencing, i.e. sufficient buffers between Tree Protection Zones (TPZ) and the security fencing. 14. Prescribed impacts to water quality and hydrology of Mulwala Channel No 19 must be considered 14.1. Amend section 8.3 of the BDAR to include prescribed impacts to waterbodies, water quality and hydrological process in accordance with Section 8.3.4 of the BAM. 14.2. Specify measures that will be implemented to mitigate any additional prescribed impacts. 15. Mitigation measures need more detail to meet the requirements of BAM section 8.4 15.1. Update Table 22 and Table 23 of the BDAR to detail auditable mitigation and management measures that follow the SMART principles. <u>Matters of National Environmental Significance</u> 16. EPBC Act listed Natural Grasslands of the Murray Valley Plains CEEC has not been considered 16.1. Based on the outcome of PCTs revision (as per Issue 8), if required, update the BDAR to assess grassland PCTs against the diagnostic criteria and condition thresholds for the Natural Grasslands of the Murray Valley Plains	evidenced by the occurrence of mature Grey Box trees scattered across the surrounding areas. Section 4.2 has been revised to include correct floristic data from Q1, Q2, Q3, Q6 and Q7. VI Plot labels have been added to Figure 5. No PCT changes to the BAM-C were made as there was no change to PCT. DNG Wet (VZ3) occurs as a small patch between the access road to the existing Finley Substation and Brockmanns Road (Figure 5). This zone is dominated by Finger Rush, a native grass species that grows in wet areas and on the fringes of waterbodies. Other native species present include Common Couch, Galvanized Burr and Curly Windmill Grass. Weed species included Wimmera Ryegrass, Phalaris, <i>Hypochaeris glabra</i> (Smooth Catsear), <i>Cirsium vulgare</i> (Spear Thistle), Common Crowfoot, <i>Echium plantagineum</i> (Patterson's Curse), Curled Dock, <i>Phyla canescens</i> (Lippia), Woolly Burr Medic and Galenia. Whilst the site is dominated by Finger Rush, which is not typical of the surrounding landscape and is not characteristic of PCT 76, it was not considered appropriate to attribute this vegetation zone to a different PCT as it is likely to have developed due to alterations to the drainage when the access road to the Finley Substation was constructed. There is a raised gravel pad adjacent to the wet area (Plate 6 below). The shrubs and grass species present are consistent with the vegetation in VZ1 and VZ2 and this wet area was considered to be a varied condition of the original PCT 76.

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		CEEC. Revise the BDAR if the CEEC is confirmed to be present. 16.2.Update Tables 5 and 6 to specify that they relate to EPBC Act listed TECs.	Daucus carota has been changed to <i>Daucus glochidiatus</i> and the BAM-C input data was updated. The VI Score changed from 13.2 to 13.3. No update was necessary to Sections 4.2.2.3 or 4.3 as the PCT has not changed. <i>Austrostipa aristiglumus</i> was not recorded on the subject land. Plot data was described in Section 4.2.2.2 which has been removed. 9. In table 8 the patch size has been changed from <5 to 5-24 In the BDAR. 10. Updated BAM-C, table 10 and table 19 to retain all ecosystem credit species. 11. <i>Swainsona murrayana</i> is a prostrate, ascending to erect perennial to 25 cm high, flowering between August and November (NSW Scientific Committee, 2008). The recommended survey period for this species is September (NSW DCCEEW, 2025b). Premise ecologist undertook targeted flora surveys for <i>Swainsona murrayana</i> on the 30th of September 2025 no <i>Swainsona</i> spp. were recorded. Based on the results of targeted searches, <i>Swainsona murrayana</i> is absent from the subject land. 12. With reference to section 5.3.2, <i>Crinia sloanei</i>, was once widely distributed across the Murray-Darling Basin, however, it has largely disappeared from its former range and is now mainly found in small, isolated populations near Albury, Corowa, and parts of Victoria. Since 2000, 95% of records have been in peri-urban areas around Albury-

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
			Thurgoona, Howlong, Corowa-Wahgunyah, and Rutherglen (Cth TSSC, 2019a). This species typically occurs in “grassland, woodland and disturbed areas with periodical inundation” (NSW DCCEEW, 2025b). The recommended survey period is July to August (NSW DCCEEW, 2025b). Targeted searches were completed in July 2024 after rainfall. Aural-visual surveys and call-playbacks were completed in suitable habitat in accordance with the BAM (NSW DPIE, 2020a) and the methods described in the <i>NSW Survey Guide for Threatened Frogs A guide for the survey of threatened frogs and their habitats for the Biodiversity Assessment Method</i> (Threatened Frog Survey Guidelines) (NSW DPIE 2020c). Premise ecologists have experience in frog surveys using call playback, spotlighting and recording calls to upload to the Frog ID phone application. One single frog call was heard over the four nights of survey. The species was believed to be the common <i>Crinia signifera</i>. No recording was possible due to the call not being repeated. The ecologists remained still for 20 minutes waiting with a spotlight, but no other calls were heard. Premise ecologists are familiar with both Common Eastern Froglet and Sloanes froglet and visited a reference site in Thurgoona the night before surveys to record Sloanes froglet. The Sloane’s Froglet calls were positively identified through the Frog ID phone application.

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
			No frog habitat will be impacted by the Project as the Mulwala No. 19 canal and the DNG, including the wet area, will be under-bored. The only disturbance to groundcover will be at the entry point, exit point and at any directional change where an inspection pit will be required. It is unlikely that the species occurs on the subject land, there will be no impact to potential habitat, and it is not considered necessary to include <i>Crinia sloanei</i> as a species credit species for the Project. 13. The proposed BESS and all of the ancillary infrastructure, including construction compound, laydown areas, site office and car parks will be located in the Category 1 – Exempt land north of Broockmans Road. A security fence will be constructed around the proposed BESS. A security fence will be erected around the proposed BESS site. No native vegetation will be disturbed for the construction of the fence. There is one Grey Box tree approximately 7 m from the proposed boundary of the Bess site. The tree has a diameter at breast height (DBH) of 120 cm. The tree protection zone for this tree would be 14.4 m calculated using methods described in “AS 4970-2009 Protection of trees on development sites, Section 3: Determining the tree protection zones of the selected trees.” The Tree Protection Zone (TPZ) will be advised as a mitigation measure in the BDAR.

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
			The existing Finley Substation has a security fence installed. There will be no changes to the existing facility as a result of the Project. Under-boring has been adopted as the method of connecting the Project to the existing Substation to reduce potential impacts to biodiversity values. Native plantings including shrubs and some eucalyptus spp. occur along the southern boundary of the Finley substation. A conservative approach has been taken to calculate a tree protection zone for these plantings using an estimate of the largest diameter at breast height (DBH) which was 50 DBH. The tree protection zone for this tree would be 6 m calculated using methods described in "AS 4970-2009 Protection of trees on development sites, Section 3: Determining the tree protection zones of the selected trees." No construction works are proposed along the southern boundary of the substation; this area was included as a conservative approach in case the connection point from the BESS site to the Finley substation needed to be changed. 14. Section 8.3 of the BDAR has been updated to include waterbodies. The Mulwala Canal is the longest irrigation canal in the southern hemisphere, drawing water from Lake Mulwala, supplying the Berrigan, Denimein, Deniboota and Wakool irrigation districts. The canal was constructed between 1935 and 1942. It is an earth lining with concrete and steel components at the intake and outlet

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
			areas. The canal on the subject land had some fringing vegetation, mostly exotic <i>Cyperus eragrostis</i> (Tall Flatsedge) and Common Couch. The canal may provide habitat for mobile species such as the threatened Grey Falcon, Black Falcon, White-bellied Sea-Eagle and White-throated Needletail (NSW DCCEEW, 2025b). The Mulwala No. 19 Canal will be under-bored to avoid any impact to the waterbody, water quality or hydrology. The bore will commence on the northern side of Broockmans Road and extend to beyond the extremities of the canal. There will be no impact to the Canal as a result of the project. The Ulupna No. 4 Channel is a small depression in the northern extent of the subject land; at the time of survey this channel contained no water and was dominated by exotic grasses. 15. Table 22 and table 23 will be revised to follow the SMART principles, to meet the requirements of BAM section 8.4. 16. Based on the revised PCT justification, we are confident in the original PCT selection. Grassland PCTs were considered not suitable to describe the vegetation on the subject land due to the remnant <i>Eucalyptus microcarpa</i> in the immediate surrounds, the soil type, dominant species and presence of PCT 76 in the area as identified on the State Vegetation Type Map. PCT 76 is not associated with Natural Grasslands of the Murray

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
			Valley Plains CEEC and thus recommendations are not applicable. Updated mitigation measures are included in the list of updated mitigation measures provided at Appendix B.
Hazards	DPHI Hazards	Findings and Recommendations The team is satisfied that given location, separation and area allocated the risks associated with the proposal are low. Hazard Consideration for Conditions of Consent The following items are considered relevant for the conditions of consent to ensure the control of hazard related risks for the proposed development. 1) Battery Energy Storage System. a. A battery energy storage limits of 100MW discharge and 200 MWh storage. As per the scope of the proposed development, to ensure the final design is consistent with the scope and findings; and b. Preparing a fire safety study in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study', demonstrating that the final design of the batteries minimises the risk of escalation to adjacent batteries. 2) Dangerous Goods a. To minimises the risks to surrounding land use from the storage of dangerous goods. The quantity of dangerous good, stored remains below the threshold quantities in the Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33.	The Applicant acknowledges the DPHI Hazards and supports the recommended conditions of consent. The Applicant committed to preparing a Fire Safety Study (FSS) prior to construction in accordance with Hazardous Industry Planning Advisory Paper No.2 and relevant FRNSW guidelines, and to implementing the approved fire safety measures. The Applicant also committed to ensuring that the storage and handling of dangerous goods remains below applicable threshold quantities and is undertaken in accordance with relevant Australian Standards and NSW EPA requirements. These commitments ensure that hazard risks associated with the development are appropriately managed in accordance with the Department's recommendations. Updated mitigation measures are included in the list of updated mitigation measures provided at Appendix B.

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		b. To minimise the risk of any dangerous goods stored at the site the storage of dangerous goods to be undertaken according to Australian Standards and/or the EPA Guidelines. This condition will minimise the risk of any dangerous goods stored at the site. Recommended Conditioning of the Proposal The team recommends the following conditions if approved: XW Unless the Planning Secretary agrees otherwise, the battery storage facility or system associated with the development must not exceed a total delivery capacity of 100 MW and an energy storage capacity of 200 MWh. XX At least one month prior to commencing construction of the battery storage facility, and associated footings/foundations except for construction of those preliminary works that are outside the scope of the hazard studies, or within such further period as the Planning Secretary may agree, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline and FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations; (b) describe the final design of the battery storage; (c) include reasonable worst-case bush fire scenario to and from the battery storage and the associated bush fire management; and	

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		(d) identify measures to eliminate the expansion of any fire incident including: (i)adequate fire safety systems and appropriate water supply; (ii) separation and / or compartmentalisation of battery units; and (iii) strategies and incident control measures specific to the battery storage design. Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study. Note: 'to the satisfaction of FRNSW' above means confirmation in writing from FRNSW that the study meets the requirements of FRNSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline Storage and Handling of Dangerous Materials XY The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times. XZ The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements listed from (a) and (b) above, the most	

Categorisation	Agency	Agency Advice / Concerns	Applicant Response
		stringent requirement must prevail to the extent of the inconsistency.	

5. UPDATED PROJECT JUSTIFICATION

The Finley BESS has been assessed as State Significant Development in accordance with the EP&A Act and the SEARs. The project supports the NSW Government's strategic objectives for a reliable, affordable and sustainable electricity system by providing firming capacity to support renewable energy generation and electricity network stability.

Following public exhibition of the EIS and ongoing engagement with Transport for NSW (TfNSW), the project has been refined to include intersection upgrade works at the Riverina Highway / Canalla Road / Marantellis Road intersection, to ensure compliance with Austroads standards and improve road safety outcomes. This refinement results in a minor extension to the development site and is documented in a separate Amendment Report.

The inclusion of the intersection upgrade represents a proportionate and responsive refinement to the project that improves traffic safety and operational performance of the local and regional road network. The amendment has been informed by further assessment and does not alter the fundamental nature, scale or purpose of the Finley BESS.

The updated assessments, which are appended to this Submissions Report, were undertaken to respond to agency advice and submissions received during public exhibition, and to reflect the minor extension to the development site associated with the intersection upgrade works. In addition, a Preliminary Site Investigation (PSI) has been prepared and appended as supplementary information to support future site decommissioning and the return of the land to its former use.

The updated and supplementary technical assessments appended to this Submissions Report include:

- > Biodiversity Development Assessment Report (BDAR) (**Appendix E**);
- > Aboriginal Cultural Heritage Assessment Report (ACHAR) (**Appendix F**);
- > Traffic Impact Assessment (TIA) (**Appendix G**);
- > Flood Impact Assessment (FIA) (**Appendix H**);
- > Oversize Overmass (OSOM) Route Study (**Appendix I**); and
- > Preliminary Site Investigation (PSI) (**Appendix J**).

The updated and supplementary assessments confirm that the inclusion of the intersection upgrade works does not result in any additional adverse environmental, social or cultural heritage impacts beyond those assessed in the exhibited EIS.

Where minor changes to impact calculations or assessment extents were required, these have been appropriately addressed through updated mitigation and management measures, which are consolidated in **Appendix B**. Importantly, no new or materially increased impacts have been identified, and the overall conclusions of the EIS remain unchanged.

The project, as refined, continues to:

- > align with Commonwealth, State and local strategic planning and energy policy frameworks;
- > avoid and minimise environmental impacts through site selection, design and mitigation;
- > ensure infrastructure safety and operational integrity through compliance with relevant technical standards; and

- > deliver public benefit by supporting electricity system reliability while incorporating agency-requested safety upgrades.

Accordingly, the amended Finley BESS remains acceptable on planning, environmental, social and technical grounds, and the inclusion of the TfNSW requested intersection upgrade strengthens the project without giving rise to any additional adverse impacts. The project is therefore considered justified in its amended form and consistent with the objects of the *Environmental Planning and Assessment Act 1979* and the principles of ecologically sustainable development.



6. REFERENCES

Table 10 – References

References
Berrigan Shire Council (BSC), 2025. Berrigan Local Environmental Plan 2013. Retrieved from: https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0587
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Premise, 2026. Biodiversity Development Assessment Report (BDAR), Finley Battery Energy Storage System
Premise, 2026. Aboriginal Cultural Heritage Assessment Report (ACHAR), Finley Battery Energy Storage System
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Premise, 2025. Visual Impact Assessment (VIA), Finley Battery Energy Storage System
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Premise, 2025. Water Impact Assessment (WIA), Finley Battery Energy Storage System
Premise, 2026. Flood Impact Assessment (FIA), Finley Battery Energy Storage System
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APPENDIX A

SUBMISSIONS REGISTER



Table 11 - Submissions register

Group	Name	Section of report where issues addressed
Agency Advice	DCCEEW Water Group	Agency advice and the Applicant's responses are summarised in Table 9 , with the updated mitigation measures provided in Appendix B .
	CPHR	
	Transgrid	
	NSW SES	
	HNSW ACH	
	Fire and Rescue NSW	
	Mining, Exploration and Geoscience	
	Crown Lands	
	DPIRD Agriculture	
	Water NSW	
	TfNSW	
	DPHI Hazards	
	Berrigan Shire Council	
	NSW RFS	
Stakeholder groups	Murray Irrigation	Public submissions and the Applicant's responses are summarised in Table 8 and addressed in detail in Appendix D .
	Dennis Armstrong	
	Lynette LaBlack	
	Noel Hicks	
	John Clark	
	Tegan Hare	
	Eunice Steinhardt	
	John McBratney	
Public submissions	Name Withheld x 55	
	Steven Broussos	
	Ian McDonald	
	Stan Moore	
	Grantley Bird	
	Jeanine Bird	

APPENDIX B

UPDATED MITIGATION MEASURES

Table 12 provides an updated summary of project mitigation measures, reflecting refinements arising from agency submissions, community feedback, and updates to technical assessments.

For ease of interpretation:

- > New mitigation measures are shown in **green**;
- > Measures no longer relevant are shown with **red** strikethrough; and
- > Unchanged mitigation measures remain in black.

Table 12 - Mitigation measures summary

Impact	Mitigation Measures
Biodiversity	> Planning the timing of vegetation removal to avoid the breeding seasons of threatened migratory and resident species; > Undertake pre-clearing surveys to determine the presence of resident fauna in vegetation; > Implementation of best practice clearing protocols; > Prior to commencing vegetation clearing, daily site briefings are to occur to identify the development site boundary, the presence of any adjacent remnant vegetation to be retained and methods to relocate habitat features into adjacent habitat; > Clearly demark any vegetation to be retained; > Construction activities are to occur generally during daylight hours minimising light spill and noise disturbance; > Implementation of hygiene protocols. Vehicles, machinery and equipment to be clean prior to mobilisation to site; > Application of herbicides to HTW is to occur as per the NSW Department of Primary Industries guidelines (NSW DPE, 2024.). Spraying is to occur during suitable weather conditions; ~~and~~ > Implementation of best practice erosion management and monitoring; > Prior to commencement of works on site, establishment and maintenance of tree protection zones (TPZs) around woody vegetation directly surrounding the subject land > Engagement of a suitably licensed wildlife carer or veterinary practice prior to vegetation clearing to respond to injured fauna if required; and > Implementation of sediment and erosion control measures in accordance with a Soil and Water Management Plan (SWMP) prepared prior to construction and consistent with Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004).
Aboriginal heritage	> Prior to works commencing a Chance Finds Protocol (CFP) is to be developed for the site. The CFP must include the procedure and management of unexpected finds relevant to Aboriginal cultural heritage. > The CFP must include procedures for: • Notifying Heritage NSW, a heritage consultant and RAPs or the Local Aboriginal Land Council (LALC) where unexpected finds are identified; and • If suspected human remains are located during any stage of the proposed works, work must stop immediately and the NSW Police notified. An

Impact	Mitigation Measures
	Archaeologist or Physical Anthropologist should be contacted in the first instance where there is uncertainty whether the remains are human. > All impacts must remain within the assessed study area or further archaeological investigation may be required.
Historic heritage	Although no historic heritage sites have been identified within or in proximity to the development site and the site has not been assigned heritage significance, there is the potential for unknown archaeological remains to be discovered and encountered during the construction of the BESS. While the potential to discover items of heritage significance is considered extremely low, a precautionary principle applies. Appropriate mitigation measures would be implemented during the construction phase of the project to minimise the potential for adverse impacts in the form of an unexpected finds protocol.
Land	> Compliance with mitigation measures specified in the EIS is anticipated to reduce the risk of land use conflicts; > The reversibility of the project would allow the site to be returned to its existing land use, therefore minimising potential for long term conflict and impacts to future agricultural activities. > Compliance with the following crime management measures is anticipated to reduce the risk of conflict related to the increased risk of vandalism and theft for surrounding residents: • Maintenance of the existing key access point to ensure the delineation between private and public is clear; • Existing boundary fencing is to be maintained and/or installed to ensure site access is controlled; • Appropriate signage should be installed; and • Landscaping is to be maintained to remove opportunities for concealment. > Ongoing consultation with stakeholders will identify and address concerns if they arise; and > Implement all measures specified in management plans identified in the EIS and/or consent conditions (if approved). Preparation of a Biosecurity Management Plan will be developed in consultation with the landowner and Local Land Services to address risks of pest, weed and disease introduction or spread, and will include measures, but not be limited to: > Inspection, wash-down and certification protocols for plant, vehicles and equipment entering or moving within the site; > Decontamination procedures to prevent the introduction or spread of weeds, pests and plant or animal diseases; and > Ongoing site management and monitoring measures to minimise biosecurity risks to adjoining agricultural land.

Impact	Mitigation Measures
Visual	> Plant a landscaping treatment around the perimeter of the Finley BESS site comprising of two (2) staggered rows of fast-growing native tree species, planted at 1.5 m in height, capable of achieving a mature height of up to three (3) metres, to be planted around the perimeter security fencing and maintained for the life of the project. > Abide with AS/NZS 4282:2023 Control of the obtrusive effects of outdoor lighting. > The Applicant will consult with Council regarding suitable vegetation plantings endemic to the region prior to implementation of permitter vegetation screening.
Noise	> Implement community consultation or notification measures regarding noise generating activities; > Ensure workers and contractors are aware of noise management requirements in approvals consents or licenses, site inductions and "toolbox talks" providing a summary of relevant project requirements for reference; > Inform truck drivers of designated vehicle routes, parking locations and acceptable delivery hours or other relevant practices, such as minimising use of engine brakes and avoiding engine idling; > Use broad band reversing alarms on all mobile plant and equipment where possible; > Examine different types of machines that perform the same function and compare the noise level data to select the least noisy machine; > Operate plant in a quiet and efficient manner; > Reduce throttle setting and turn off equipment when not being used; > Regularly inspect and maintain equipment to ensure it is in good working order including checking the condition of mufflers; > Avoid unnecessary dropping of materials from a height and metal to metal contact on equipment; > During any work generating high noise levels that have impulsive, intermittent, low frequency or tonal characteristics, consultation with sensitive receptors occurs regularly; and > During works, the applicant will incorporate staff training regarding excessive noise from machinery use the importance of the recommended mitigation measures.
Transport, traffic and access	> No engine breaking is to be utilised when slowing to enter the development site entrance off Canalla Road; > Drivers are not to hold vehicles when exiting the site onto Canalla Road; > Excessive revving of engines is not permitted when exiting the development site; > Trucks are not to stage on surrounding roads prior to entering the development site, adequate staging areas should be provided at the Finley BESS locations; > One sign to be made moveable at Pinch Point 07 – Right Turn Goulburn Valley Hwy & River Rd; > One sign to be made moveable at Pinch Point 16 – Left Turn – Newell Hwy & Riverina Hwy; and > Implementation of the proposed Traffic Management Plan.

Impact	Mitigation Measures
	> Prepare an OSOM Transport Management Plan (TMP), incorporating final confirmed dimensions and weights, will be prepared to the satisfaction of TfNSW and NHVR prior to OSOM movements. No OSOM movements will occur without all required permits and approvals being in place. Rail Crossing > The applicant will submit the request at least two (2) months before passage and include the specifications of the OSOM movement to via the National Heavy Vehicle portal, or directly to UGLRL via heavyvehicle@uglregionallinx.com.au.
Water	> Water supply arrangements are subject to variations in construction methods, staging, quantities, measurements and the attainment of a construction contract for the proposed development. A detailed site water balance will be prepared prior to construction to confirm water requirements and supply arrangements for the proposed development. > To minimise the potential for impacts to existing groundwater, it is recommended, that several shallow bores and/or geotechnical drillholes be drilled across the development site prior to construction to verify existing lithology, depth to water and to attain baseline groundwater quality. > Subject to confirmation of groundwater depths via an on-site investigation during detailed design and the selection of an appropriate construction method (concrete footings or steel piling footings), no groundwater dewatering is anticipated as a requirement to facilitate construction of the development. > Excavations should be limited to depths above the observed groundwater levels. Where deeper excavation is required, the groundwater assessment will be reviewed. > The progression of detailed design for the project should include: • Ongoing consultation with Berrigan Shire Council, Murray Irrigation and other relevant stakeholders to ensure appropriate measures are implemented to minimise localised water impacts, including risks to surrounding land and irrigation networks. • The design of controls to minimise the potential for water impacts (i.e., bunding of areas presenting contamination risks); and • The design of proposed infrastructure including the proposed method for underboring activities developed in ongoing consultation with Murray Irrigation Pty Ltd. Construction Phase: > Prepare a Soil and Water Management Plan (SWMP) prior to construction to detail potential risks and appropriate measures designed in accordance with Managing Urban Stormwater – Soils and Construction Volume 1 (Landcom, 2004). The SWMP will be prepared as part of a Construction Environmental Management Plan (CEMP) to manage potential risks to soils, surface and ground water. Recommended measures for the construction SWMP include but are not limited to: • Measures to minimise and manage the potential for erosion and sediment transport within and from the Project area; • Measures to manage accidental spills and waste storage;

Impact	Mitigation Measures
	- Measures to manage stormwater and the potential for contaminated runoff from the Project site; - Measures to ensure that excavation activities and any stockpiling are managed to minimise the potential for downstream contamination; and - Measures to ensure that areas of exposed soil and the time in which they are exposed are minimised as far as practical. > Stockpiling of any excavated material shall be managed in accordance with the SWMP to minimise the mobilisation and transport of dust, sediment and leachate into downstream environments. Recommended measures to manage stockpiling include but are not limited to: - Ensuring stockpiles are located away from drainage lines, waterways, and areas susceptible to erosion; - Minimising the number, size and duration of stockpiles used; - Ensuring stockpiles are stabilised and implementing dust suppression methods as required; - Ongoing review and inspection of the use of heavy vehicles and/or machinery, including transport tracks used, for erosion risk; and - Ensuring that vehicles transporting waste and/or excavated material are appropriately covered to reduce the potential for dust. > The SWMP shall include procedures to reduce and manage the risk of emergency events and the potential for wastes and spills to contaminate soils, surface and ground water. Recommended measures to manage the potential for contaminated discharge include: - The storage of all fuel chemicals and liquids in sealed bunded areas on level ground away from stormwater drainage lines and waterways; - Ensuring refuelling and maintenance activities are restricted to designated areas with appropriate bunding and spill capture controls; - Implementing controls as part of the construction SWMP that provide procedures to respond to emergencies and spills (e.g., Groundwater monitoring bore installation, regulator notification and provision of spill kits); - Ensuring visual inspections of drainage lines and disturbed areas are undertaken during construction to assess any potential soil or surface water issues; and - The installation and maintenance of stormwater control measures including drainage networks and bunding that segregate stormwater runoff according to its potential for contamination. During operation procedures shall be developed to reduce the potential water impacts including the contamination of soils, surface and ground water, resulting from wastes, spills and/or emergency incidents. Suggested measures to control the potential for water impacts and contamination during operation include: > The appropriate storage of equipment and hazardous substances during operation; > Ensuring that plant and stormwater control measures are maintained to prevent contamination of soil; and

Impact	Mitigation Measures
	> Preparation of appropriate procedures to response to emergency incidents (i.e., floods, fires), spills and leaks from the development site, including operational equipment and maintenance activities (e.g., Groundwater monitoring bore installation, regulator notification and provision of spill kits). Groundwater > If groundwater is intercepted, a Water Access Licence (WAL) will be obtained prior to any water take occurring, unless an exemption under Clause 7 of Schedule 4 of the <i>Water Management (General) Regulation 2018</i> applies; and > Where an exemption applies, all statutory requirements will be met, including limits on annual take, record-keeping and reporting obligations. > If groundwater interception is found to exceed 3 ML per water year, an Aquifer Interference Assessment will be prepared in accordance with the <i>NSW Aquifer Interference Policy</i> (2012) and the Aquifer Interference Assessment Framework, prior to continued groundwater take.
Hazards	> BESS units to be tested in accordance with UL9540A; > Testing demonstrates clearances required to prevent propagation of fires between separated units; > BESS units are to be installed in accordance with manufacturer and UL9540A report recommended clearances based on testing; > BESS units to be installed with fire protection systems specified by the manufacturer and UL9540A report; > UL testing information to be made available to the certifying authority; > Vent covers of the BESS shall be constructed of non-combustible materials; > Vents will not be located above battery packs within the BESS container; and > All transformers are to be self-bunded on a skid, otherwise they will require a dedicated concrete bund. > Ensure that the storage and handling of dangerous goods remains below applicable threshold quantities and is undertaken in accordance with relevant Australian Standards and NSW EPA requirements.
Flood	> The BESS infrastructure platforms continue to be constructed at the modelled raised levels to maintain flood conveyance and minimise localised impacts; > Detailed civil and drainage design remains consistent with the modelled development layout and levels assessed in this report; > Finished surface levels and access routes are designed to maintain safe flood behaviour during major and extreme flood events, where practicable; > Any future changes to site layout, platform levels or surrounding land use are reviewed to confirm consistency with the flood modelling assumptions; and > The CEMP and OEMP shall include procedures to incorporate flood risk awareness, evacuation protocols, and weather and flood warning monitoring into site inductions and relevant management plans, and to suspend site activities during forecast or active flood events in accordance with advice from the Bureau of Meteorology and NSW State Emergency Service.

Impact	Mitigation Measures
Bushfire	> Design and construction – equipment will be sited in a way that will not contribute to bush fire risk and will minimise the impact of bush fires on the capabilities of the infrastructure during bush fire emergencies by: • Spacing between BESS container accumulations (i.e. 4 containerised units) shall be a minimum of 3 m to prevent fire propagation: > End to end spacing (short side) of BESS containerised units shall be a minimum of 3 m; and > Back to back spacing (long side) of BESS containerised units shall be a minimum of 3 m. > BESS containerised units are provided with the following emergency protection systems as specified by the BESS manufacturer; • Smoke detector sensor; • Heat detector sensor; • Flammable gas sensor; • Off-gassing valve; • Explosion-proof valve; • Water detector sensor; • Fire strobe; • Alarm bell; and • All BESS containerised units can be shut down locally or remotely in an emergency. > Vents shall not be located above battery packs within the BESS container and will be constructed of non-combustible materials. > During construction and for the life of the project, a 10m Asset Protection Zone (APZ) will be provided around project-related infrastructure. Temporary construction and laydown areas, site access and associated fencing do not require specific APZ. The following vegetation management requirements apply in the APZ: • Trees will not be located within the APZ; • Shrubs will not be located within the APZ; • Grass should be kept mown to a height of < 100 mm in height; • Leaves and vegetation debris should be removed to reduce fuel load; • Roads and paved/cleared areas are suitable within the APZ. > Landscape maintenance includes the APZ around infrastructure, the implementation of proposed vegetation screening and the ongoing management of the development site to reduce fire intensity and the rate of spread as it approaches structures in accordance with PBP 2019 and NSW planning guidelines. > On-site static water supply 75,000 L dedicated for firefighting purposes, strategically positioned within the development site and fitted with Storz fittings. > Main vehicular access, internal road network will provide for safe, reliable and unobstructed passage for firefighting vehicles and maintained for the life of the development, including:

Impact	Mitigation Measures
	• The trafficable surface has a minimum width of 4 m with 1 m traversable shoulders; • Minimum vertical clearance of 4 m in height to any overhanging obstructions; • Unsealed/sealed all weather traversable roads will be of suitable load bearing capacity, drainage structures and feature crossings; • Road grade to be less than 10° • Allow for two way traffic flow, enabling safe ingress and egress to the development site. A Bush Fire Emergency Management and Operations Plan (BEMOP) will be prepared to support emergency management for the Finley BESS ensuring bushfire protection mitigation measures are maintained, detailing: > APZ and landscape fuel load management; > Detailed measures to prevent or mitigate fires igniting; > Work that should not be carried out during total fire bans; > Availability of fire-suppression equipment, vehicular access and water; > Storage and maintenance of fuels and other flammable materials; > 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; > Appropriate bush fire emergency management planning; and > Nominating an emergency meeting point, preferred evacuation route and methodology for ensuring all occupants are safe and accounted for. The BEMOP will be developed in consultation with the local NSW RFS District Office and will be communicated to relevant stakeholders. Regarding bush fire, the threat at the development site is considered low, being possible ember and smoke attack only assuming the APZ is maintained. Further to the requirements of PBP 2019, the applicant will provide: > Ongoing training for all on-site personnel regarding bush fire response procedures; > Firefighting training for operational workers; and > Operational vehicles will be fitted with basic firefighting equipment. > Preparation and implementation of a Fire Management Plan (FMP) prior to construction, to the satisfaction of the NSW RFS, which will be maintained for the life of the development. At a minimum, the Fire Management Plan will include: • Ongoing bush fire fuel management across the development site; • A site infrastructure plan identifying all project-related assets; • A site access and internal road plan demonstrating suitable access, turning areas and clearances for emergency vehicles; • Identification, establishment and ongoing maintenance of Asset Protection Zones (APZs) in accordance with Planning for Bush Fire Protection 2019 and the approved Bush Fire Assessment; and

Impact	Mitigation Measures
	• Identification and mapping of hazards (including physical, chemical and operational hazards) that may affect fire-fighting operations, together with corresponding management and response measures. > Ongoing engagement with the NSW Rural Fire Service, including: • Consultation with the NSW RFS District Office – Southern Border Team during detailed design and prior to commencement of construction; and • Continued engagement during construction and operation to ensure emergency response arrangements remain fit for purpose and that there is a shared understanding of site-specific response requirements.
Fire	> Prior to commencement of construction, the Applicant will prepare a Fire Safety Study (FSS) in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2². The FSS will: • Be prepared to the satisfaction of Fire and Rescue NSW; • Be submitted to FRNSW for review prior to any further fire safety submissions; • Inform the detailed design of the project; and • Be prepared consistent with FRNSW Fire Safety Guideline – Technical Information: Large-scale external lithium-ion battery energy storage systems – Fire safety study considerations. > The FSS will include, as applicable: • An Initial Fire Safety Report (IFSR); and • A Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). > Prior to occupation or commissioning of the Finley BESS, the Applicant will prepare an Emergency Plan (EP) for the site in accordance with the requirements of HIPAP No.15. The Emergency Plan will address: • Site-specific fire and emergency scenarios; • Incident management, notification and response procedures; and • Coordination with relevant emergency service agencies. > Prior to occupation or commissioning, the Applicant will prepare an Emergency Services Information Package (ESIP) in accordance with the FRNSW Fire Safety Guideline – Emergency Services Information Package and Tactical Fire Plans. The ESIP will be provided to FRNSW and will include all information necessary to support emergency response and tactical fire planning for the site. > The Applicant further commits to ongoing consultation with Fire and Rescue NSW during the preparation of the above documentation to ensure that all fire safety measures are fit-for-purpose and aligned with emergency response requirements.
Waste	A Waste Management Plan incorporating all phases of the Finley BESS would be prepared and implemented prior to the commencement of any on-site works. The principles guiding the preparation of the future waste management plan are outlined in ~~Appendix P~~ Appendix K .
Social	Ongoing communication:

Impact	Mitigation Measures
	> Continue engagement with the Council and key stakeholders on the proposal's design, construction activities, benefit-sharing initiatives, and further opportunities to deliver benefits to the local community and maintain a social licence to operate. > Continue presence and consultation in the community during planning stages to increase the perception of influence and foster trust. > Develop and implement a stakeholder engagement and communication strategy so that residents can provide feedback throughout the construction period. > Engage community stakeholders in identifying opportunities to develop a benefits sharing scheme or good neighbour programs. During construction phase: > Develop and implement an operational workforce accommodation strategy before construction that assesses the housing and accommodation environment, identifies potential accommodation and rental market pressures in the local and regional area, and details plans to accommodate the proposed workforce effectively. > Continue engagement with the Council and relevant stakeholders and develop and implement a construction workforce accommodation strategy before construction. > Consider liaising with other significant concurrent projects to understand their peak workforce requirements. Moreover, programming construction works for the proposal should be considered to align with reductions in workforce requirements for concurrent projects. > Engage key stakeholders to inform the development of the procurement plan, which should outline commitments to achieving local content and diversity requirements as required by the relevant State and Federal Government policies. > Identify and assess potential cumulative construction-related impacts associated with other surrounding developments. Mitigation and monitoring measures should be provided for all identified cumulative construction impacts. > Explore programming construction works to align with reductions in workforce requirements for concurrent projects to enhance the potential availability of local workers, which can support the proposal. > Develop a detailed Construction Management Plan that considers concurrent renewable and significant projects, particularly concerning cumulative traffic impacts, and aligning any workforce accommodation plans or employment strategies. During operational phase: > Consider engaging communities in the definition of the community benefit fund to ensure meaningful opportunities to deliver local benefits are identified and implemented to maintain social licence.
Economic	> Develop an AES that includes continuous engagement with local industry representatives that prioritises the use of local contractors, manufacturing facilities, and materials; > Liaison with local representatives regarding accommodation options for staff, to minimise adverse impacts on local services; > Liaison with local tourism industry representatives to manage potential timing conflicts with local events; and

Impact	Mitigation Measures
	> The Applicant or developer will consult with local employment agencies and training organisations and, where practicable, will consider supporting training and apprenticeships.
Cumulative	Maintain ongoing communication with surrounding renewable energy developers and accommodation providers to manage potential cumulative impacts and where possible, coordinate and sequence the workforce.
Contamination	> Any land disturbance incorporating material containing demolition waste should include assessment for the presence of contaminants (including asbestos), and managed accordingly. > Avoiding skin contact with soil that is discoloured, malodorous, containing foreign matter and/or generally inconsistent with virgin soil. > No entry permitted into confined spaces and excavations; and > Controls are to be in place to contain soil and soil impacts (e.g. dust, sediment, etc) to within the area of the site.
Decommissioning	> Upon decommissioning, all project infrastructure will be fully removed, including all above-ground and below-ground infrastructure, in accordance with agreements with the landowner and conditions of consent. > The site will be rehabilitated to a condition suitable for the reinstatement of irrigated agricultural cropping, subject to landowner requirements.

APPENDIX C

CONSULTATION

APPENDIX D

DETAILED PUBLIC SUBMISSION RESPONSES

Table 13 - Detailed response to public submissions

Submission ID	Submission	Applicant Response	Category	Sub-category
SE-85691732	This infrastructure is too dangerous to the neighbouring properties and communities. BESS factories are a significant fire risk. BESS factories cause significant noise pollution. I object to this project.	Risks associated with the Finley BESS, including fire, safety and hazard-related matters, have been rigorously assessed through the EIS and supporting technical studies, including the Preliminary Hazard Analysis and Bush Fire Assessment Report. These assessments were undertaken in accordance with the SEARs and relevant adopted standards and guidelines. Credible hazard scenarios were identified and assessed, and appropriate design, separation, monitoring and emergency response measures have been incorporated to ensure residual risks are managed to as low as reasonably practicable. Noise impacts during both construction and operation were assessed in the Noise Impact Assessment. The assessment demonstrates that operational noise levels would comply with relevant criteria at surrounding sensitive receivers. Construction noise would be temporary in nature and managed through standard construction management measures. Where addressed: EIS Section 6; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N; Noise Impact Assessment – Appendix J. Mitigation measures / Applicant commitments: > Implementation of manufacturer-specified fire protection systems and UL9540A-tested separation distances; > Provision of a 10 m Asset Protection Zone around infrastructure; > Preparation and implementation of a Bush Fire Emergency Management and Operations Plan; > Implementation of construction and operational noise management measures, including equipment selection, maintenance, and community notification, as outlined in UPDATED MITIGATION MEASURES Appendix B.	Project risk (including fire, safety and hazards); Noise impacts (construction and operation)	Fire risk; Operational noise impacts
SE-85691748	I object to the Finley BESS project. Why is our government forcing FIRE HAZARDOUS infrastructure and UNRELIABLE energy on our nation at the expense of rural Australia?! Save the land that supports and produces food and fibre for Australia. Put these elsewhere! These projects are destroying rural Australia!!	The delivery of battery energy storage projects such as the Finley BESS is consistent with Commonwealth and NSW Government policy frameworks aimed at transitioning to a reliable, affordable and sustainable electricity system. The Finley BESS provides firming capacity by storing electricity during periods of low demand and dispatching it during periods of peak demand, supporting electricity system reliability. Impacts on agricultural land have been assessed in the Agricultural Impact Assessment and Land Use Conflict Risk Assessment. The project footprint has been minimised, and the development is reversible, allowing the land to be returned to its existing agricultural use at the end of the operational life. No significant or irreversible impacts to surrounding agricultural activities have been identified.	General objection to BESS or renewable energy infrastructure; Impacts on agricultural land uses.	Objection in principle to renewable energy; Loss of agricultural land.

Submission ID	Submission	Applicant Response	Category	Sub-category
		Where addressed: EIS Section 2; Agricultural Impact Assessment – Appendix H; Land Use Conflict Risk Assessment – Appendix G. Mitigation measures / Applicant commitments: > Limiting disturbance to the approved development footprint; > Ongoing consultation with surrounding landowners and stakeholders; > Implementation of land use conflict mitigation measures and security controls as outlined in Appendix B; > Commitment to decommissioning and rehabilitation of the site at the end of the project life.		
SE-85691769	This battery storage system is of a major fire risk and will put significant strain on local and rural firefighting services. These local firefighting services are not equipped with the resources or manpower to manage emergency fires for when they do break out at this site. Why should the community risk their lives and step up to fight fires for infrastructure that they never wanted there in the first place?	Fire risk and emergency response capability were assessed in the Preliminary Hazard Analysis and Bush Fire Assessment. The Finley BESS incorporates a range of design and operational measures to minimise the likelihood and consequence of fire, including container separation distances, integrated fire detection and suppression systems, and remote shutdown capability. The project includes provision of on-site firefighting water supplies and access arrangements to support emergency response. A Bush Fire Emergency Management and Operations Plan will be prepared in consultation with the NSW Rural Fire Service to ensure appropriate coordination and response arrangements are in place. Where addressed: EIS Section 6; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N. Mitigation measures / Applicant commitments: > Provision of a dedicated 75,000 L on-site static water supply for firefighting; > Maintenance of all-weather emergency access for firefighting vehicles; > Preparation and implementation of a Bush Fire Emergency Management and Operations Plan; > Ongoing training for on-site personnel in emergency response procedures.	Project risk (including fire, safety and hazards); Social impacts / community wellbeing.	Fire risk and emergency response capability; Community safety and emergency preparedness.

Submission ID	Submission	Applicant Response	Category	Sub-category
SE-85691782	BESS factories are destroying the landscapes and significantly devaluing residential, agricultural and commercial properties within rural communities. Nobody would want to live anywhere near this heap of fire-causing garbage. Nuclear MUST be explored. I OBJECT to the BESS and ALL renewable projects that are proposed for Australia	Visual impacts of the Finley BESS were assessed in the Visual Impact Assessment, which considered views from surrounding public and private viewpoints. The assessment found that visual impacts would be localised and mitigated through landscaping and setback design. Property value impacts are not a statutory consideration under the EP&A Act and were not identified as a measurable impact in the assessment. The project design incorporates visual screening to reduce visibility over time. Where addressed: EIS Section 6; Visual Impact Assessment – Appendix I. Mitigation measures / Applicant commitments: > Planting of staggered rows of fast-growing native vegetation around the site perimeter; > Maintenance of landscaping for the life of the project; and > Compliance with AS/NZS 4282:2023 for control of obtrusive lighting.	Visual impacts; General objection to BESS or renewable energy infrastructure	Visual amenity and landscape character; Objection in principle to renewable energy
SE-85691787	Local farmers, homes and businesses face losing critical water supply, should this project go ahead. How would the community get through periods of drought and water restrictions when this infrastructure would clearly be given water priority?	Water supply and water quality impacts were assessed in the Water Impact Assessment. The project does not require ongoing operational water use and would not receive priority access to local water supplies. Construction water requirements will be managed through a site-specific water balance and consultation with relevant authorities. Measures are included to prevent contamination of surface water and groundwater, including bunding, spill management and erosion and sediment controls. Where addressed: EIS Section 6; Water Impact Assessment – Appendix L. Mitigation measures / Applicant commitments: > Preparation of a detailed site water balance prior to construction; > Preparation and implementation of a Soil and Water Management Plan; > Bunding of areas presenting contamination risks; and > Spill response procedures and emergency management measures as outlined in Appendix B.	Pollution or contamination risks; Water impacts.	Water supply availability; Water contamination risk.

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SE-85693468	I would like to begin by acknowledging the farmers of the land within our great nation of Australia today. I pay my respects to Australia™s past, present and future farmers who have and will continue to battle setbacks such as renewable energy destruction, drought, floods, vermin plagues, diseases, and government policy, all so they can provide Australia with food and fibre. I acknowledge that these setbacks come at a high price of mental health, and many have taken their lives as a result due to such pressures. I extend this respect and am thankful for the sacrifices those within the agricultural industry make in order to provide Australia with the essentials; I acknowledge the agricultural industry as the backbone of our nation. We need to unite and fight these developers and the Australian government for forcing this upon us. I object because BESS projects are too damaging to the communities, landscapes, environment and animals. what happens when they catch fire? How will the noise from BESS impact livestock and native wildlife? Not only are they dangerous, they are an absolute eye-sore. Let's put these closer to the cities so all the NIMBYs can marvel at what their vote has given them. Leave our landscapes alone and our government needs to do better. Noting the Livestock Producer Assurance accreditation application, they recognise and acknowledge that agricultural land WILL BE POISONED by batteries and solar panels. Given this significant fact, these projects should NOT go ahead as they compromise our food security and environmental safety.	Agricultural impacts, biodiversity impacts, fire risk, noise and visual impacts have been comprehensively assessed through the EIS and supporting technical studies. The assessments demonstrate that impacts can be appropriately managed through design and mitigation measures and that the project does not pose unacceptable risks to agricultural production or environmental values. Social impacts, including community wellbeing, were assessed in the Social Impact Assessment, which identified mitigation measures to manage potential impacts and support ongoing engagement with the community. Where addressed: EIS Sections 5 and 6; Agricultural Impact Assessment – Appendix H; Biodiversity Development Assessment Report – Appendix E; Social Impact Assessment – Appendix O; Visual Impact Assessment – Appendix I; Preliminary Hazard Analysis – Appendix M. Mitigation measures / Applicant commitments: > Implementation of biodiversity protection and hygiene measures; > Landscaping and visual screening; > Noise management during construction and operation; > Ongoing community engagement and communication; and > Implementation of all mitigation measures outlined in Appendix B.	Impacts on agricultural land uses; Social impacts / community wellbeing; Visual impacts; Project risk (including fire, safety and hazards).	Agricultural land protection; Mental health and community wellbeing; Visual amenity; Fire risk.
SE-85695471	NO!! I object to this project. Explore a reliable form of energy such as nuclear. Explore a cleaner form of energy such as nuclear. Battery Energy Storage Systems are too dangerous for the environment. BESS presents significant fire risks. BESS infrastructure will negatively impact the safety, visual amenity of the community and landscapes.	The Finley BESS has been assessed in the context of NSW energy policy frameworks, which support the deployment of battery energy storage systems to provide firming capacity and improve electricity system reliability. The project does not preclude consideration of other energy technologies and has been assessed on its individual merits under the EP&A Act. Fire and safety risks have been comprehensively assessed through the EIS and supporting studies, including the Preliminary Hazard Analysis and Bush Fire Assessment. These assessments considered credible fire scenarios and confirmed that, with appropriate design, separation, detection and emergency response measures, residual risks can be managed to as low as reasonably practicable. Visual impacts were assessed in the Visual Impact Assessment, which concluded that impacts would be localised and mitigated through site layout, setbacks and landscaping, with visual screening improving over time as vegetation establishes. Where addressed: EIS Sections 2 and 6;	General objection to BESS or renewable energy infrastructure; Project risk (including fire, safety and hazards); Visual impacts	Objection in principle to renewable energy; Fire and safety risk perception; Visual amenity and landscape character

Submission ID	Submission	Applicant Response	Category	Sub-category
		Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N; Visual Impact Assessment – Appendix I. Mitigation measures / Applicant commitments: > Installation of BESS units in accordance with UL9540A-tested separation distances and manufacturer specifications; > Provision of fire detection, suppression and remote shutdown systems; > Establishment and maintenance of perimeter landscaping comprising staggered rows of native vegetation; and > Compliance with AS/NZS 4282:2023 for control of obtrusive lighting.		
SE-85695479	BESS is dangerous and brings hazards to the project and community. The noises from this BESS project will have negative impacts on the nearby livestock and wildlife. These impacts will be evident in not only everyday life for the animals, but also during breeding and birthing cycles. BESS carries significant fire risk.	Fire risk has been assessed through the Preliminary Hazard Analysis and Bush Fire Assessment, which identified appropriate controls to minimise the likelihood and consequences of fire. These include physical separation of units, integrated detection systems and emergency response planning. Noise impacts were assessed in the Noise Impact Assessment, which considered potential effects on surrounding land uses. Construction noise would be temporary and managed through standard mitigation measures, while operational noise levels are predicted to comply with relevant criteria. Potential impacts on fauna and livestock were also considered, with construction impacts being short-term and managed through timing, noise controls and minimisation of disturbance. Where addressed: EIS Section 6; Noise Impact Assessment – Appendix J; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N; Biodiversity Development Assessment Report – Appendix E. Mitigation measures / Applicant commitments: > Limiting construction activities to generally daylight hours; > Selection and maintenance of quieter plant and equipment; > Implementation of fauna pre-clearing surveys and best-practice clearing protocols; > Ongoing monitoring and management measures as outlined in Appendix B.	Project risk (including fire, safety and hazards); Noise impacts (construction and operation); Impacts on biodiversity	Fire risk perception; Noise impacts on livestock and wildlife; Fauna disturbance

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	All Murray Irrigation requirements met to date, subject to ongoing consultation between the proponent and Murray irrigation to ensure works are in accordance with Murray Irrigation requirements. Murray Irrigation has extensively reviewed the information available on the NSW Planning Portal for the State Significant Development Application for the Finley Battery Energy Storage System (application number SSD-72430958) including the Environment Impact Statement with attention to the water requirements at item 6.8 and the Water Impact Assessment Appendix L. Murray Irrigation notes that subject to the implementation of best-practice environmental management measures, including a Construction Environmental Management Plan (CEMP) and supporting plans, the development is not expected to result in significant impacts on surface water quality, erosion, sedimentation or the Groundwater Dependent Ecosystems. Additionally, the development is intended to align with best practice for flood risk management. Murray Irrigation notes that the development does not intend to or need any volumetric water licencing requirement issued by Murray Irrigation during the construction or ongoing operation. Murray Irrigation notes that the design of the proposed infrastructure including the proposed method for underboring activities is to be developed in consultation with Murray Irrigation Ltd, and is to align with Murray Irrigation's Works Policy. Murray Irrigation appreciates the preliminary and ongoing engagement with the proponent in finalizing the proposed infrastructure to ensure compliance to the requirements for minimum separation distances from irrigation infrastructure and underboring distances specific to the establishment of the proposed underground transmission cables transecting Mulwala No. 19 Channel.			
SE-86152707	Save Our Surroundings (SOS) objects to this project. There are so many issues with the term Renewables because it is predominately the industrial wind and solar works, BESS, pumped hydro and associated new transmission infrastructure elements that create complexity in presenting the problems with these to people with little understanding of Australia's transition to a new but not better electricity network. For instance, industrial wind and solar works, BESS, pumped hydro and new transmission infrastructure (Ruinales) ruin many dozens things from national security to ever higher electricity prices to consumers (refer to the Attachment for 33 examples). This proposed Ruinales project will only add to these examples, unless the Proponent can provide factual evidence to the contrary. It appears that South Australia is the "canary in the mine" and the examples 1 and 2 in Appendix B clearly demonstrate that, as many engineers, economists, consultants, analysts, commentators and others have stated, an electricity system dominated by wind and solar electricity generation, even with storage, cannot even meet SA's demand let alone the whole of Australia. Sun and wind droughts are natural occurrences which can last for short or very long periods and occur simultaneously across the entire NEM grid, as occurred on 4/6/2024 and other occasions. The inevitable consequence of a transition to a Ruinales-based energy system, which Australia is already experiencing, is an expensive, unreliable, unstable, high security risk energy system that is destroying environments and the economy for no measurable benefit.	The submission raises a number of strategic and policy-level matters relating to the national electricity system that extend beyond the scope of this SSD application. The Finley BESS has been assessed on its individual merits in accordance with the Environmental Planning and Assessment Act 1979 and the SEARs, having regard to relevant Commonwealth and NSW policy frameworks. Potential impacts on agricultural land and productivity have been specifically assessed in the Agricultural Impact Assessment (AIA). The AIA concluded that the project footprint represents a small proportion of the broader agricultural landscape, that the land is capable of continuing surrounding agricultural activities, and that the development is reversible, allowing the land to be returned to agricultural use at the end of the operational life. No significant or irreversible impacts on agricultural productivity or viability were identified. Cumulative impacts, including those relating to land use, workforce, traffic and community services, were also considered in the EIS. The assessments demonstrate that, with the implementation of mitigation measures, the Finley BESS would not result in unacceptable cumulative impacts when considered alongside other existing or approved developments. Where addressed:	General objection to BESS or renewable energy infrastructure; Social impacts / community wellbeing; Impacts on agricultural land uses; Cumulative impacts	Objection in principle to renewable energy transition; Energy reliability and economic concerns; Cumulative and strategic impacts

Submission ID	Submission	Applicant Response	Category	Sub-category
	Ruinables vs Renewables Definition of Renewable Energy The Encyclopaedia Britannica defines renewable energy as, "usable energy derived from replenishable sources such as the Sun (solar energy), wind (wind power), rivers (hydroelectric power), hot springs (geothermal energy), tides (tidal power), and biomass (biofuels). Renewable Energy (RE)", in the Australian context, includes hydro electric generation, which largely distorts any understanding of the full impact of transitioning to a almost entirely national electricity system dominated by intermittent industrial scale wind and solar electricity generation that must also be supported by battery energy storage systems (BESS) and pumped hydro storage works, all connected by new transmission infrastructure. "Variable Renewable Energy (VRE)" is sometimes used to describe just the wind and solar electricity generation component of Renewables and includes industrial large scale solar (e.g. greater than 10MW capacity) and small scale solar (e.g. residential rooftop solar) systems. There are significant differences between small and large scale solar systems to justify treating them independently (refer Appendix A). Definition of Ruinables To better understand the impacts of Australia's transition to a predominately industrial wind and solar driven electricity system we need a better term to describe industrial elements of the new system. That term is Ruinables Save Our Surroundings (SOS) defines Ruinables as, industrial large scale dispersed, intermittent, non-synchronous, non-dispatchable energy derived from not always available input sources such as the Sun (solar energy) and Wind (wind power) supported by intermittently available energy storage sources, such as Battery Energy Storage Systems and Pumped Hydro works, all connected by new Transmission Infrastructure to the existing grid. Why the term Ruinables? Save Our Surroundings (SOS) has over many years researched, analysed and written hundreds of papers and submissions, as well as appearing as witnesses at Federal Joint Parliamentary hearings and presenting at numerous independent planning panels on specific Ruinables projects. There are so many issues with the term Renewables because it is predominately the industrial wind and solar works, BESS, pumped hydro and associated new transmission infrastructure elements that create complexity in presenting the problems with these to people with little understanding of Australia's transition to a new but not better electricity network. For instance, industrial wind and solar works, BESS, pumped hydro and new transmission infrastructure (Ruinables): 1. Ruin Australia's energy security as the supply of components are mainly sourced from China, the world's highest emitter of green house gasses. 2. Ruin Australia's national security due to the predominance of foreign sourced components and the foreign control and influence over our electricity networks. 3. Ruin the stability of the existing electricity grid due to its unpredictable variable output (availability, quality and stability of frequency and voltage). 4. Ruin the Australian economy by making the provision of energy increasingly more and more expensive, so causing higher costs for almost every endeavour leading to individual hardships, record business failures, reduced manufacturing and investments going overseas.	EIS Section 2; Biodiversity Development Assessment Report – Appendix E; Land Use Conflict Risk Assessment – Appendix G; Agricultural Impact Assessment – Appendix H; Social Impact Assessment – Appendix O; Visual Impact Assessment – Appendix I; Noise Impact Assessment – Appendix J. Mitigation measures / Applicant commitments: > Limiting development to the approved footprint; > Maintaining agricultural access and surrounding land uses; > Commitment to decommissioning and rehabilitation to return the site to agricultural use; > Ongoing engagement with surrounding landowners and stakeholders; and > Implementation of cumulative impact management measures identified in Appendix B.		

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	5. Ruin the principle of equity by imposing huge industrial developments and all their negative consequences on regional and rural Australians while city dwellers are exempted. 6. Ruin the fairness between small scale solar and large scale solar because the former has its capacity limited (e.g. a 6.6kW system restricted to 5kW export to the grid) and will soon be charged to supply to the grid, whereas industrial large scale generators get guaranteed revenue under the Capacity Investment Scheme and guaranteed minimum income per MW hour under the RET scheme. 7. Ruin the principle of inter-generational equity through ever increasing billions in recurring subsidies that are largely financed from government debts that will have to be repaid by future generations. 8. Ruin the principle of government policy justification on the basis of rigorous costbenefit analysis, which was not done so resulting in multi-billion dollar cost-blowouts (e.g. Snowy 2.0, Marinus Link), continually rising energy costs to consumers, grid instability, no measurable impact on climate, loss of jobs, etc. 9. Ruin evidenced-based decisions by ignoring the overseas experiences that every country that has incorporated more than 30% of wind and solar electricity capacity has resulted in significantly increased energy costs to consumers, reduced economic activity and increased the unreliability of energy delivery. 10. Ruin the concept of equivalence as Ruinables capacity is NOT equivalent to Coal, Gas and Nuclear power capacity by a factor of at least 1:10, when based on expected output (kilowatt hours) over, say 50 years using just economic lives and capacity factors. 11. Ruin the ability of rural communities to voice their objections by for example, in NSW, requiring 50 or more written unique objections to Ruinables proposals that consist of over 1000 pages or more and only 4 weeks on exhibition. 12. Ruin productive food producing land by covering large areas with industrial structures that replace primary industry benefits of feeding both Australians and overseas communities as well as providing export income. 13. Ruin productive food producing land by compulsorily acquiring land for transmission infrastructure, so reducing productivity of the land lost and often the remaining land. 14. Ruin, potentially, future use of agricultural land where toxic contamination from solar panels (e.g. large scale damage from hail, lightning, fires, storms, land fill disposal), from deterioration of wind turbine blades (release of nano-particles through abrasion or landfill disposal, lightning, fires, storms, oil leaks) has occurred. 15. Ruin the principle of social licence by ignoring typically 90 - 100 % of submissions from communities being objections to individual projects. 16. Ruin availability to local residents of essential services (e.g. trades, medical) during the up to three years construction period per project, each requiring hundreds of imported workers, and potentially overwhelming the local population several times over (e.g. population of historic town of Gulgong NSW is 2700, proposed multiple labour camps starting 4kms from town totalling 7000 or more imported workers plus 3000 relatives, during the expected cumulative peak construction period 2026-28). 17. Ruin the rural and regional life-styles of areas subjected to: firstly, years of construction activity impacting services, roads, travel, safety, noise, accommodation rents and: secondly, loss of rural jobs, loss of amenity, loss of nature, loss of community and loss of health for decades. 18. Ruin years of a person developing their property only to have a massive industrial development only metres from their boundary. 19. Ruin the viability of existing local businesses that compete for workers by having to attract workers by higher wages and the provision of, or subsidised accommodation. 20. Ruin the mental health of some affected people because of endless Ruinables proposals for nearly a decade already, invasion of their properties, loss of relationships, industrialisation of their environment, sleep deprivation from audible and infrasound, economic impacts, loss of leisure time, etc.			

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	21. Ruin the desirability of tourists to visit rural areas which will be surrounded by thousands of square kilometres of Ruinables projects visible for tens of kilometres. 22. Ruin job opportunities for local youth as rural jobs are reduced and ongoing Ruinables on-site jobs are typically zero-less than ten, even for individual projects that occupy thousands to tens of thousands of hectares of land. 23. Ruin the ability of rural and regional fire services to protect local communities from fires and toxic smoke in and around industrial works. 24. Ruin wildlife habitats through land clearing and fencing off natural wildlife movements. 25. Ruin the lives of local wildlife, often threatened and endangered species, through the destruction of habitat and causing death during construction and operation. 26. Ruin family relationships and create social disharmony. 27. Ruin friendships and create conflict between neighbours because hosts get financial gain but neighbours are negatively affected in multiple ways (e.g. visual, noise, water run-off, pests, increased fire risks, reduced food production, higher insurance premiums, unable to insure for increased risks, reduced property values). 28. Ruin the lives of artisan miners in the Republic of Congo and the Uyghur in China who are used as slave labour to produce Ruinables components. 29. Ruin the rural, regional and ocean views of residents, visitors and tourists. 30. Ruin the character of rural and wilderness areas by covering thousands of square kilometres with industrial structures, some as high as 300m and 200m wide and which can be visible from over 70kms away. 31. Ruin any justification for subsidising old Ruinables technologies that were first used for generating electricity from a wind turbine to charge a battery (James Blyth in 1887) and commercial solar panels (Bell Laboratories in 1950s) and have been in use globally at scale for nearly 30 years. 32. Ruin any case for a transition to a Ruinables dominated energy system by ignoring or distorting facts, logic, physics, engineering, and actual experience that repeatedly show that the stated objectives are not and will not be achieved (that is: affordable electricity, reliable and secure supply, combating climate change through emissions reductions). 33. Ruin any case for a transition to a Ruinables dominated energy system by ignoring or distorting facts, logic, physics, engineering, and actual experience that repeatedly show that sun and wind droughts mean no electricity generated for consumers, including industrial batteries (BESS) and pumped hydro schemes. (refer Appendix B for examples). Appendix A: Differences between small scale and large scale solar systems Definition of Ruinables: Save Our Surroundings (SOS) defines Ruinables as, industrial large scale dispersed, intermittent, non-synchronous, non-dispatchable energy derived from not always available input sources such as the Sun (solar energy) and Wind (wind power) supported by intermittently available energy storage sources, such as Battery Energy Storage Systems and Pumped Hydro works, all connected by new Transmission Infrastructure to the existing grid. There are significant differences between small scale (< 100kW capacity) and large scale (>100kW capacity) solar systems to justify treating them independently. Typically, significant Ruinables projects are 100,000kW (100MW) to 1,200,000kW (1,200MW or 1.2 gigawatts) in size. By comparison, small-scale solar systems range from about 5kW to 100kW and are typically installed on rooftops.			

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	Because of these significant differences, as summarised in the table below, our definition of Ruinables excludes small scale solar. <table><tr><th>Characteristic</th><th>Small scale solar</th><th>Large scale solar</th></tr><tr><td>Requires little or no land use</td><td>Yes</td><td>No</td></tr><tr><td>Does not reduce food growing capacity</td><td>Yes</td><td>No</td></tr><tr><td>Does not damage wildlife habitats</td><td>Yes</td><td>No</td></tr><tr><td>Does not remove or interfere with wildlife from area</td><td>Yes</td><td>No</td></tr><tr><td>Does not alter the local views or landscape character</td><td>Yes</td><td>No</td></tr><tr><td>Does not require excessive quantities of materials</td><td>Yes</td><td>No</td></tr><tr><td>Allows an individual to choose to have installed or not</td><td>Yes</td><td>No</td></tr><tr><td>Provides lowest cost electricity to the premises ⁽¹⁾</td><td>Yes</td><td>No</td></tr><tr><td>Does not depend on subsidies for economic viability ⁽²⁾</td><td>Yes</td><td>No</td></tr><tr><td>System degradation with age is not a concern ⁽³⁾</td><td>Yes</td><td>No</td></tr><tr><td>Reduces demand on the grid ⁽⁴⁾</td><td>Yes</td><td>No</td></tr><tr><td>100kW maximum capacity to qualify for small scale technology certificates (STC)[subsidy]</td><td>Yes</td><td>No</td></tr><tr><td>100kW minimum capacity to qualify for large scale generation certificates (LSC), a subsidy of at least \$40/MWh], competitive preferences, subsidised loans, guarantee revenue (CIS) ⁽⁵⁾</td><td>No</td><td>Yes</td></tr><tr><td>Requires rehabilitation of land upon decommissioning</td><td>No</td><td>Yes</td></tr></table> (1) Small scale solar systems do not incur the operating costs of large scale solar systems (e.g. land lease payments, community funds, VPAs, transmission losses, vegetation maintenance, road maintenance, wages) yet use similar technology (solar panels and inverters). (2) Large scale solar systems require subsidies and protection from competition for both construction and operation of the system. Small scale systems will return the capital outlay, whether subsidised or not, by avoiding the use of expensive grid supplied electricity and by receiving a feed-in tariff where available (3) Solar panels and inverters continually lose efficiency with age, which reduces revenue for large-scale solar systems until operation becomes uneconomic. Small scale solar systems are less affected by system degradation as the system usually produces more electricity during sunny days then is consumed. (4) Small scale solar (e.g. rooftop) consumes what is electricity generated or exports any excess to the grid if connected to it, whereas industrial solar, which usually incorporate a BESS, draw electricity from the grid for BESS cooling, equipment and facilities operation. Wind works also draw from the grid for operating turbines on windless days, and for BESS cooling, equipment and facilities operation	Characteristic	Small scale solar	Large scale solar	Requires little or no land use	Yes	No	Does not reduce food growing capacity	Yes	No	Does not damage wildlife habitats	Yes	No	Does not remove or interfere with wildlife from area	Yes	No	Does not alter the local views or landscape character	Yes	No	Does not require excessive quantities of materials	Yes	No	Allows an individual to choose to have installed or not	Yes	No	Provides lowest cost electricity to the premises ⁽¹⁾	Yes	No	Does not depend on subsidies for economic viability ⁽²⁾	Yes	No	System degradation with age is not a concern ⁽³⁾	Yes	No	Reduces demand on the grid ⁽⁴⁾	Yes	No	100kW maximum capacity to qualify for small scale technology certificates (STC)[subsidy]	Yes	No	100kW minimum capacity to qualify for large scale generation certificates (LSC), a subsidy of at least \$40/MWh], competitive preferences, subsidised loans, guarantee revenue (CIS) ⁽⁵⁾	No	Yes	Requires rehabilitation of land upon decommissioning	No	Yes			
Characteristic	Small scale solar	Large scale solar																																															
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Requires rehabilitation of land upon decommissioning	No	Yes																																															
SE-86161958	Why limit this to just storage when you can generate electricity too at the same site? If you're going to build a battery anyway, you might as well build solar panels or wind turbines around it	The Finley BESS has been assessed as a standalone battery energy storage project connecting to the existing Transgrid Finley Substation. The scope of the SSD application is limited to the BESS and associated enabling works, as described in the EIS. The project has been designed to provide firming and dispatch capacity to support electricity network stability. Co-location with additional generation assets (e.g. solar or wind) is not part of this proposal and would require separate design development and assessment, including consideration of additional land requirements and environmental impacts. The proposal has therefore been assessed on its merits as lodged. Where addressed: EIS Section 3 (Project description); EIS Section 2 (Strategic context).	General objection to BESS or renewable energy infrastructure; Transport, traffic and access	Project scope and technology selection; Co-location with generation assets																																													

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SE-86238460	Halt All Further processing of and or development of Finley Battery 100MW/200MWh, at Finley near Deniliquin. Berrigan Shire is situated in the Southern Riverina and consists predominantly of irrigated rural land - Irrigated Rural Land ! The Shire is situated in the Southern Riverina and consists predominately of irrigated rural land - Irrigated Land - with its main income is derived from agriculture - Agriculture, Agriculture, not Industrialisation! Berrigan Shire Council says, "We acknowledge the Traditional Owners of the lands across Australia. We acknowledge the wisdom of Elders past, present and emerging and recognise the positive contribution of First Nations people to the health and wellbeing of our..." Liars. The Health and Well-being of our Lands Waterways and Communities Murray Basin Food Bowl Catchments are Under Threats Unlike Ever before due to RE transition, an Industrialisation of Our, Australians Ours, Precious Precious Farmlands growing FOOD. FOOD. F O O D. FOOD. The Berrigan Shire Council is a small rural community with a population exceeding 8,500. It is situated on the NSW/Victorian border and encompasses the four towns of Barooga Berrigan, Finley and Tocumwal. Berrigan Shire is Bordered by The Murray River, lush eucalyptus bushlands and vast agricultural fields - vast agricultural fields, growing FOOD for Australians and the Australian economy, now under Threats Unlike Ever before for No reason but a Scam called Net Zero, and another one claiming "Clean Energy ". There's no such thing as Clean Energy. I'm tired the Ignorant as Our government who are Selling Our, Australians Ours, Nation, and Don't Care about That, Don't Care about That, and I have to ask Why, Why don't you Care that You Sell Our Nation away to Foreign Investment that has NO Care for Country nor All On Country Lands Waterways and Communities Australian. Shame on you All. Shame on you All. Shame On You All. Shame On You All. Shame On You. Shame On You.	The submission raises a number of broad policy-level matters regarding Australia's energy transition that extend beyond the scope of this SSD application. The Finley BESS has been assessed on its individual merits in accordance with the EP&A Act and SEARs, having regard to relevant strategic and policy frameworks. Potential impacts on agricultural land and productivity have been assessed in the Agricultural Impact Assessment and Land Use Conflict Risk Assessment. The project footprint has been sited to avoid unnecessary land take, and the development is reversible, allowing the land to be returned to its former agricultural use at the end of the operational life. Site-specific environmental matters, including water and biodiversity, have also been assessed through the EIS and supporting specialist studies. Social and community wellbeing considerations were assessed in the Social Impact Assessment, which identifies measures to manage potential impacts through communication, consultation and benefit-sharing opportunities. Where addressed: EIS Section 2; EIS Section 6; Agricultural Impact Assessment – Appendix H; Land Use Conflict Risk Assessment – Appendix G; Water Impact Assessment – Appendix L; Social Impact Assessment – Appendix O; Engagement Outcomes Report – Appendix R. Mitigation measures / Applicant commitments: > Compliance with land use conflict mitigation measures and ongoing stakeholder consultation; > Preparation and implementation of Soil and Water Management measures (construction and operation controls) to avoid impacts to land and waterways; > Ongoing communication and engagement measures as outlined in Appendix B (including two-way channels and continued engagement during construction and operation); and > Commitment to decommissioning and rehabilitation to return the site to its former use.	General objection to BESS or renewable energy infrastructure; Impacts on agricultural land uses; Social impacts / community wellbeing; Cumulative impacts	Objection in principle; Protection of irrigated agricultural land / "food bowl" concerns; Community wellbeing concerns; Regional proliferation / cumulative development narrative

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	Shame On You. These are Our, Australians Ours, Precious Precious Farmlands you are planning an UNHEALTHY, UNWELL, Future upon. How Dare You. How Dare You. How Dare You! You have NO Respect for Murray River Lands Waterways and Communities. Shame on you. I Need Clean Lands Waterways and Communities as they were prior to 1843. You Threaten My Planned Future I had in a Plan to offer Next 8 Generations a Healthy Clean Environment you Threaten Daily and don't Care that you do. I need every one of you to Resign Immediately, sell your homes, and pack up, and go and live in China, and work in Their factories that use Coal did you know, the Australian Government still sells offshore whilst Claiming Clean Energy farce, lies, lies, lies, lies, lies, all Lies. How Dare You. I Demand Organically Grown Australian Only Now from Now. I Demand Chemical Agriculture Cease Immediately. I Demand an investigation into Australian Certified Organic Immediately. I Demand a Moratorium on RE transition Immediately. I Demand the Murray River be under Full Protection offered by Murray River Elders of Knowledge. I Demand Minister Watt step down. Reasons: - Ignorance - lack of Care for Community Australian - complete lack of Care to Australian Food Production Catchments - inability - enabling the sale and take over of Our, Australians Ours, Precious Precious Farmlands including Murray Darling Basin Food Bowl Catchments. - being Unhealthy Sack Yourself Minister Watt. You don't Care for Country nor All On Country Lands Waterways and Communities Australian and World's. Erin Brockovich does. We need here here in Australia Immediately.			

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	https://sfstandard.com/2025/02/06/erin-brockovich-lawsuit-moss-landing-power-plant-fire/ You don't Care you see. I Care . I do. I need Next 8 Generations living in a world free of chemicals. Rather than I Can't Bear it. I am going to ask for a Royal Commission into the Australian Government selling Our, Australians Ours, nation to Foreign Investment, for No reason but a Scam called Net Zero and another one claiming Clean Energy. There's no such thing as Clean Energy. Who do you think you are ? Shame on you. You don't know what you are doing to Your Fellow Australians you just don't have any Care for. Why ? Ask yourself. Minister Watt, Cease Immediately Finley Battery. Below are stories written by Renew Economy. Shows the degree of Take Over of Our, Australians Ours, Precious Precious Farmlands Under Threats Unlike Ever before and for No reason but a Scam called Net Zero and so called Clean Energy. "The South Korean industrial giant Samsung has unveiled plans for yet another big battery " its third " to be built in the increasingly congested south-west region of NSW. The new plans are for the 80 MW, 320 MWh South Coree battery, located just 1km from the existing 175 megawatt (MW) Finley solar farm which is now owned by the UK-based OX2. It follows news in February thatSamsung is also looking to build the 250 MW Samsung Romani solar farm,accompanied by a 150 MW, 600 MWh battery near Hay, with a separate standalone 200 MW/800 MWh battery at the same location. Both projects are proposed by Samsung™s renewable energy and storage offshoot Samsung C&T Renewable Energy Australia. The South Coree battery is not located within the south-west renewable energy zone, to be serviced by the new transmission link from South Australia to NSW, Project EnergyConnect, and is looking to connect and gain grid access on existing local infrastructure, in this case a 66kV line. However, Samsung says in its application for EPBC approval that its project is also located close to at least two other battery storage projects, the proposed Finley battery which is right next door, and also close to the Finley substation that connects the solar farm, and Syncline Energy™s proposed 400 MW, 1,600 MWh Berrigan battery a little further west.			

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	Also in the area are AGL and Someva Renewables™ Pottinger Energy Hub, which will feature a battery up to 500 MW and 2,000 MWh, along with large wind and solar facilities, and Engie™s The Plains, featuring a battery up to 400 MW and 1600 MWh, along with a gigawatt scale wind farm. Both of these projects are thought to be on the short list for access rights to the south west REZ. Samsung says its project is 39.5 km away from the proposed boundary of the south-west REZ. Samsung is relatively new to the Australian renewable energy landscape, entering the market in 2022. It says it has been working on four solar farm and battery projects in Queensland, and at least five in NSW, and has a total pipeline of 1.5 GW of projects. Its website does not list the South Coree project." Look what You've Done to us, your Fellow Australians you have Absolutely No Care for. Shame on you. Look what You've Done to Our, Australians Ours, Precious Precious Farmlands including Murray Darling Basin Food Bowl Catchments !!! Shame on you. What do you Eat, You Filthy Unwell People !!			
SE-86245209	Contamination and Waste Management are issues that are being swept under the carpet. It™s time government stop putting renewable targets ahead of the nation™s public health and food security. Please refer to attachment for further details. The concept of an industrial lithium battery energy storage system (BESS) is physically, economically, and environmentally flawed. Batteries will never facilitate renewable energy to be 24/7 dispatchable, and with a 2-hour depth are incapable of driving modern industry on any real scale. This pursuit is a total waste of taxpayers' money and is causing willful destruction to the natural environment and untold human misery in mining - tenfold that of fossil fuels - the trace elements required in battery manufacture. Toxic PFAS 'forever chemicals' imbedded in lithium-ion batteries present a dangerous source of chemical pollution that new research carried out by Jennifer Guelfo PhD of Texas Tech University and Lee Ferguson PhD of Duke University found in their peer reviewed paper published in Nature Communications 8 July 2024, threatens the environment and human health as the industry scales up. They found alarming levels of the chemicals in the environment near manufacturing plants and discovered that waste from batteries disposed of in landfills was a major pollution source. PFAS are a class of man-made compounds most often used to make products resistant to water, stains and heat. They are called 'forever chemicals' because they do not naturally break down and have been found to accumulate in humans. The chemicals are linked to cancer, birth defects, liver disease, plummeting sperm counts and a range of other serious health problems. The paper notes that few end-of-life standards for PFAS battery waste exist, and the vast majority ends up in landfill where it can leach into waterways, accumulate locally or be transported long distances. Detection of the chemicals in snow far from manufacturing plants or landfill suggests the chemicals, like BPA, easily move through the atmosphere. The study noted previous research that bis-FASI can be reused, though less than 5 per cent of lithium batteries are recycled. That could yield a projected 8 million tons of battery waste by 2040 if battery recycling is not dramatically scaled up with demand. As an accredited LPA livestock producer selling beef into the Grass-Fed market, I am very aware of the strict compliance requirements of the rules and regulations set down by Meat Standards Australia in	Potential pollution, contamination and waste pathways associated with construction, operation and credible incident scenarios have been assessed through the EIS and supporting specialist studies. The Water Impact Assessment identifies measures to prevent contaminated runoff and manage spills, including bunding, designated refuelling areas, spill response procedures and stormwater controls. Hazard-related matters, including credible incident scenarios, were assessed in the Preliminary Hazard Analysis and Bush Fire Assessment, which inform design and management controls to minimise risk. Waste management principles for the project are set out in the EIS, including commitments regarding appropriate handling, storage and off-site disposal or recycling of wastes by appropriately licensed contractors. At the end of project life, decommissioning would be undertaken to remove infrastructure and rehabilitate the land for return to its former use, consistent with the decommissioning commitments described in the EIS. Where addressed: EIS Section 6; Water Impact Assessment – Appendix L; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N; Waste Management Principles – Appendix P. Mitigation measures / Applicant commitments: Water / contamination > Prepare a Soil and Water Management Plan (SWMP) as part of the CEMP;	Pollution or contamination risks; Waste; Social impacts / community wellbeing; Decommissioning information	Chemical contamination (incl. PFAS/heavy metals) and land/water pathway concerns; Battery waste and end-of-life management; Food chain / producer assurance concerns; Precautionary principle / moratorium request

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	regard to hormonal growth promotant (HGP), grain or feed containing grain, feed containing animal fats, by-product stockfeed, feed containing chemical residues within a Withholding Period (WHP) when harvested, and any livestock still within a WHP or Export Slaughter Interval (ESI) as set by APVMA or SAFEMEAT following treatment with any veterinary drug or chemical, and their slaughter for export. To meet these criteria a National Vendor Declaration (NVD) must accompany all movement of livestock and there is an obligation that I must be absolutely satisfied that I have correctly completed all parts of the NVD and that I understand that any misleading or unverified statements may result in prosecution, heavy fines or loss of my LPA accreditation thereby precluding me from trading. Australia's reputation for clean green 'food and fibre' has been built over generations on the back of good practice and strict governance. A priceless reputation second to none and envied by our competitors. Export destinations like the US, Japan, China and Europe are already very aware of the dangers of BPA in foods and packaging. If they were to get a whiff that our beef or lamb could be contaminated with BPA or other toxins, our brand built over generations would be destroyed overnight. International public health advocates are sounding alarm bells about the need to find alternatives to the toxic chemicals and heavy metals imbedded in renewable energy components for the renewable energy transition to progress cleanly. Accordingly, there needs to be a far greater focus on the toxic contamination risks arising from BESS potentially causing leaching of 'forever chemicals' and heavy metals such as cadmium, cobalt, lead, lithium-copper, mercury, and nickel into our agricultural land, water resources and atmosphere, and also a greater focus on the associated Occupational Health & Safety risks, Intergenerational Equity for our children and grandchildren and potential elevated stock toxicity levels as a measure to protect crops, livestock and producers thereby ensuring food security for our future generations. The iniquitous transition has not been properly thought through and it has far too many 'unintended consequences' for it to be fit for purpose. More than likely infrastructure will be left as stranded assets since there is no satisfactory plan for where the millions of tons of dangerous batteries will eventually end up. This nation cannot afford to let public health and food security to be undermined by this unparalleled travesty and until such time as environmental, property, and food chain protection plans have been established, I call on government to apply the 'precautionary principle' and initiate a moratorium on all BESS applications.	> Store fuels/chemicals in sealed bunded areas away from drainage lines; > Restrict refuelling/maintenance to designated bunded areas with spill capture controls; > Maintain stormwater controls (drainage networks and bunding) to segregate runoff by contamination potential; and > Implement spill kits and emergency response procedures. Waste > Prepare and implement a Waste Management Plan prior to commencement, consistent with EIS Appendix P. Hazard / bushfire > Install BESS units consistent with UL9540A testing outcomes and manufacturer requirements; > Provide on-site firefighting water supply and maintain emergency access; and > Prepare and implement a Bush Fire Emergency Management and Operations Plan.		
SE-86478961	The risk of contamination of surrounding productive agricultural land should a likely battery fire occur is too great to approve this proposal.	Incident scenarios and associated risk controls have been assessed in the Preliminary Hazard Analysis and Bush Fire Assessment. The assessment incorporates design, separation, monitoring and emergency response controls intended to minimise the likelihood and consequence of an incident. Measures are also included to manage potential contamination pathways through bunding, spill management and controlled runoff, as described in the Water Impact Assessment and mitigation framework. With these controls, residual risks are managed to as low as reasonably practicable. Where addressed: EIS Section 6; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N;	Pollution or contamination risks; Project risk (including fire, safety and hazards); Impacts on agricultural land uses	Contamination from fire/incident scenarios; Agricultural land protection / production risks

Submission ID	Submission	Applicant Response	Category	Sub-category
		Water Impact Assessment – Appendix L; Agricultural Impact Assessment – Appendix H. Mitigation measures / Applicant commitments: > UL9540A-informed clearances and manufacturer-specified fire protection systems; > On-site firefighting water supply and emergency access arrangements; > Bunding and spill response procedures; and > SWMP/CEMP measures for managing contaminated runoff and emergency events.		
SE-86480466	Power Bills Soaring, Reliability Plummeting “ Every BESS built pushes electricity prices up and grid reliability down. Australia is fast going down the gurgler due to RENEWABULL BLACKOUT BALONEY!	The submission raises broader energy market and policy matters that are not determinative of the site-specific merits of this SSD application. The Finley BESS has been assessed in the EIS as providing firming capacity by charging during periods of lower demand and discharging during peak demand, supporting electricity network stability and reliability consistent with relevant NSW strategic objectives. The proposal is assessed on its environmental, social and technical merits under the EP&A Act and SEARs. Where addressed: EIS Section 2.	General objection to BESS or renewable energy infrastructure	Energy price and reliability concerns (policy-level)
SE-86480468	This is a Catastrophic Betrayal of the Land “ iconic Australian landscapes are being permanently mutilated by industrial-scale, Filthy BESS BOMBS, Turbine Monstrosities, Toxic Solar Fields & Sabotaging Transmission Corridors “ all in the name of a Fake Green Sham!	The Finley BESS has been assessed as a defined project footprint with impacts evaluated through specialist technical studies. Visual impacts were assessed in the Visual Impact Assessment, which concluded that visual impacts would be localised and mitigated through landscaping and design measures. Biodiversity impacts were assessed in the BDAR, which identified avoidance and minimisation measures and required mitigation to manage residual impacts. Where addressed: EIS Section 6; Visual Impact Assessment – Appendix I; BDAR – Appendix E. Mitigation measures / Applicant commitments: Visual > Perimeter landscaping treatment comprising staggered rows of fast-growing native species, maintained for the life of the project; and > Compliance with AS/NZS 4282:2023 for obtrusive lighting. Biodiversity	General objection to BESS or renewable energy infrastructure; Visual impacts; Impacts on biodiversity	Industrialisation of landscape / visual character; Perceived ecological harm

Submission ID	Submission	Applicant Response	Category	Sub-category
		> Pre-clearing surveys; best-practice clearing protocols; clearly demark vegetation to be retained; hygiene protocols; erosion management and monitoring; timing of clearing to avoid breeding seasons where relevant.		
SE-86480968	This Disastrous Swindle Factory - Bis-FASI CONTaminating BESS BOMB is a Climate Hoax with Zero Return " No matter how much we destroy our environment or economy, it won™t change the global climate " because Australia contributes just over 1% of global emissions. STOP POISONING OUR SOIL & WATER - INCLUDING MULWALA CANAL - WITH RENEWABULLS - THE ASBESTOS OF THE FUTURE!! COMMONWEALTH PFAS BAN BEGINS 1st JULY 2025!!	Potential contamination pathways (construction, operation and emergency scenarios) were assessed through the Water Impact Assessment and hazard studies. The project includes measures to manage spills, bund hazardous substances, segregate stormwater according to contamination potential, and implement emergency response procedures. The proposal also commits to consultation with relevant stakeholders regarding infrastructure interfaces (where applicable), and to implementing a CEMP/SWMP to manage erosion, sedimentation and water quality risks. Where addressed: EIS Section 6; Water Impact Assessment – Appendix L; Preliminary Hazard Analysis – Appendix M. Mitigation measures / Applicant commitments: > SWMP/CEMP prepared prior to construction; > Bunded storage of fuels/chemicals; designated refuelling/maintenance areas; spill kits and response procedures; > Stormwater controls to segregate potentially contaminated runoff; and > Ongoing consultation with relevant stakeholders when works interface with water infrastructure.	Pollution or contamination risks; Water impacts; General objection to BESS or renewable energy infrastructure	PFAS / chemical contamination concerns; Waterway impacts (incl. irrigation network references); Policy-level objection
SE-86481708	This disgusting plan is part of the Chinese Communist Partys Golden Pipeline! Australia Electricity Grid is increasingly beholden to China via companies like State Grid Corporation" making our national security and critical infrastructure hostage to hostile interference.	The submission raises broader national security and geopolitical matters that extend beyond the scope of this SSD application. The project is assessed under the EP&A Act and SEARs with a focus on site-specific environmental, social and technical impacts and the effectiveness of mitigation measures. Procurement and supply chain matters are managed through relevant regulatory, commercial and governance frameworks outside the planning assessment of this proposal. Where addressed: EIS Section 2; EIS Section 6.	General objection to BESS or renewable energy infrastructure	National security / foreign influence concerns (policy-level)
SE-86481717	Unethical Slave Labour in this Supply Chain depends on torturous mining practices and exploitative labour " especially in Xinjiang & the Congo. Nothing clean & green about this Toxic Rubbish built on human suffering!	The Applicant acknowledges community concern regarding ethical supply chains and labour practices associated with the manufacture of renewable energy infrastructure components. The Finley BESS is subject to Australian legislative and regulatory requirements relating to modern slavery and ethical procurement.	General objection to BESS or renewable energy infrastructure; Social impacts / community wellbeing	Ethical supply chain / human rights concerns (policy-level); Social harm

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		The Applicant does not directly manufacture battery components; however, procurement and contracting arrangements will be undertaken in accordance with applicable Commonwealth legislation, including the <i>Modern Slavery Act 2018</i> (Cth), which establishes reporting obligations and due diligence requirements for entities operating in Australia. These requirements are intended to identify, assess and address modern slavery risks in supply chains. The Applicant will require principal contractors and relevant subcontractors to comply with applicable modern slavery, workplace relations and ethical sourcing obligations. Where addressed: EIS Section 6; Social Impact Assessment – Appendix O. Mitigation measures / Applicant commitments: > Ongoing communication and stakeholder engagement measures to manage community concerns during delivery.		
SE-86482207	This plan is about Enabling Predatory Ecocide! The irony is unbearable: biodiversity destroyed, ecology razed, wildlife habitats destroyed, land /water poisoned & energy poverty " all while politicians and activists worship their Fake Green Tower of Babel.	Biodiversity impacts were assessed in the BDAR, including habitat and fauna considerations, and mitigation measures have been identified to avoid and minimise impacts and manage residual effects. Pollution and contamination risks were assessed through the Water Impact Assessment and hazard studies, which establish controls for spill management, bunding, stormwater segregation and emergency response. Overall, the technical assessments confirm that the Finley BESS can be constructed and operated without giving rise to unacceptable biodiversity or contamination impacts, and that identified risks can be effectively avoided, minimised and managed through the implementation of the mitigation and management measures outlined in Appendix B. Where addressed: EIS Section 6; BDAR – Appendix E; Water Impact Assessment – Appendix L; Preliminary Hazard Analysis – Appendix M. Mitigation measures / Applicant commitments: > Pre-clearing surveys; best-practice clearing protocols; vegetation retention demarcation; hygiene protocols; erosion management and monitoring; and > SWMP/CEMP measures including bunding, spill response, and stormwater controls.	Impacts on biodiversity; Pollution or contamination risks; General objection to BESS or renewable energy infrastructure	Habitat loss / fauna impacts; Land and water contamination allegations; Policy-level objection



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SE-86482214	This rotten plan is all about globalist central control and socialist redistribution of wealth " using climate as a cloak. DUMP NET ZERO!	The submission raises broader policy matters that are outside the scope of the SSD assessment. Finley BESS has been assessed under the EP&A Act and SEARs as a defined proposal, with site-specific impacts and mitigation measures documented in the EIS and supporting technical studies. Where addressed: EIS Section 2; EIS Section 6.	General objection to BESS or renewable energy infrastructure	Policy-level objection (net zero / governance)
SE-86484713	Poisoned Water, Contaminated Land " Unethical CCP Slave Labour mined Cobalt for FIRE Hazardous, Filthy BESS all laced with Bia-FASI PFAS, are nothing but ruinous Toxic Junk that wrecking our childrens future forever! This horrible plan is a harmful experiment against the best interests of Australia & the rotten bureaucrats know it!	Hazard and fire-related matters were assessed in the Preliminary Hazard Analysis and Bush Fire Assessment, which set out design and operational controls to minimise risk and manage residual risk to as low as reasonably practicable. Potential contamination pathways are addressed through the Water Impact Assessment and the mitigation framework, including bunding, spill prevention and response measures, and stormwater controls during construction and operation. Overall, the technical assessments confirm that the Finley BESS can be constructed and operated without giving rise to unacceptable contamination, fire-related or agricultural land impacts, and that residual risks can be effectively managed through the mitigation measures outlined in Appendix B. Where addressed: EIS Section 6; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N; Water Impact Assessment – Appendix L; Social Impact Assessment – Appendix O. Mitigation measures / Applicant commitments: > UL9540A-informed installation and clearances; manufacturer fire protection systems; remote shutdown capability; > SWMP/CEMP including bunded storage, designated refuelling areas, spill kits and emergency response procedures; and > Stormwater controls to manage and segregate runoff.	Pollution or contamination risks; Project risk (including fire, safety and hazards); Social impacts / community wellbeing	Water/land contamination allegations; Fire risk; Concern for future generations
SE-86484724	This dodgy plan is all about Fake Jobs & Real Economic Decline. Promised green jobs are for predatory shysters, are short-term & reliant on back packer/visa like NOT ongoing jobs for locals. Meanwhile, real industries " farming, mining, manufacturing " are being regulated to death.	Economic and social impacts were assessed in the Social Impact Assessment, including workforce and local procurement considerations. The project would generate construction employment and service demand, and the assessment identifies measures to support local participation and to manage potential pressures (including accommodation and cumulative effects during construction). Where addressed: EIS Section 6;	Social impacts / community wellbeing; Economic	Employment / local jobs concerns; Perceived economic decline narrative

Submission ID	Submission	Applicant Response	Category	Sub-category
		Social Impact Assessment – Appendix O. Mitigation measures / Applicant commitments: > Develop an approach to maximise local industry participation and engagement with local representatives; > Implement workforce accommodation strategy prior to construction to manage housing pressures; and > Ongoing engagement with Council and stakeholders regarding construction activities, benefit-sharing initiatives and local opportunities.		
SE-86485207	Grid Instability is Built In to this ridiculous, destructive & poisonous plan. As this anti Australian, CCP Reliant, insecure, filthy, bomb-like BESS is NOT a generator, no amount of spin changes the fact that this lump of incapable storage, cannot EVER provide any power, let alone consistent, on-demand baseload power.	The Finley BESS is not proposed as a power generation facility but as a battery energy storage system that provides firming and network support services by charging from the electricity network during periods of low demand and discharging during periods of high demand. This role and function are clearly described in the EIS and are consistent with NSW energy policy settings. Concerns regarding fire risk and safety have been comprehensively assessed through the Preliminary Hazard Analysis and Bush Fire Assessment Report. These assessments concluded that, with appropriate design, separation distances, fire detection systems and emergency management measures, risks can be managed to acceptable levels. Broader concerns regarding grid reliability and national energy policy have been addressed previously in this Submissions Report and are matters outside the scope of the site-specific assessment of this SSD application. Where addressed: EIS Section 2; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N.	General objection to BESS or renewable energy infrastructure; Project risk (including fire, safety and hazards)	
SE-86485210	This evil plan is for Energy Poverty for Australians! All because of horrible, idiotic plans like this - our precious country areas are being gutted by massive transmission lines, forced acquisition of farmland, and soaring power bills " all to send power to delusional, distant cities who will soon be in the dark!	Concerns regarding electricity pricing, transmission planning and land acquisition relate to broader State and national energy policy and are not matters determined through the assessment of this SSD application. The Finley BESS does not involve compulsory acquisition of land or the construction of new transmission corridors. Social and community impacts have been assessed in the Social Impact Assessment, which concluded that, with standard mitigation and engagement measures, impacts can be managed and are not expected to be significant. These matters have been addressed previously in this Submissions Report. Where addressed: EIS Section 6; Social Impact Assessment – Appendix O.	Social impacts / community wellbeing; General objection to BESS or renewable energy infrastructure	

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SE-86485463	I object to Dependence on our most hostile enemy - the CCP -through their Fake Green Ruinable Junk! Our democracy is being trashed by greedy vested interests - making Australia insecure as this rubbish makes us dependent on unethical imports, rip-off subsidies, deceptive bureaucrats & globalist vipers.	The Applicant acknowledges the concerns raised. National security, foreign ownership and international trade matters are regulated through Commonwealth legislation and are not determinative considerations in the assessment of a SSD application under the EP&A Act. Ethical procurement and compliance with applicable Australian legislation, including modern slavery obligations, have been addressed previously in this Submissions Report. Where addressed: EIS Section 2; Social Impact Assessment – Appendix O.	Social impacts / community wellbeing; General objection to renewable energy infrastructure	
SE-86485475	I Object on the following grounds: * * It is destructive to native flora and fauna; * * Construction will leave a legacy of land destruction that is unlikely to be rectified by the builder; * * It is an abomination on the natural landscape; * * It is part of a system that costs billions, does not work reliably and attempts to solve a problem that does not exist, in other words useless and irresponsible use of public funds; * * All such infrastructures should be built at developer expense, NOT on public funds. ** We are told wind and solar are the cheapest, well prove it, remove all subsidises - do not build this system on public funds; * * The TOTAL cost has not been verified by independent experts. * * There is NO verified scientific basis for reduction of CO2 in the atmosphere so this project is a total waste of public money, along with all other such projects. There is in fact reliable verifiable scientific proof that CO2 is beneficial to plant life and by extension to human life on earth.	Potential impacts on biodiversity and visual amenity have been assessed in the BDAR and Visual Impact Assessment. These assessments concluded that impacts can be avoided and minimised through site selection, design and mitigation measures, with no unacceptable residual impacts identified. Land rehabilitation and decommissioning have been addressed in the EIS, with commitments to remove infrastructure and return the site to agricultural use at the end of the project life. Broader objections relating to public funding, subsidies and climate policy are matters of government policy and are outside the scope of this SSD assessment. These matters have been addressed previously in this Submissions Report. Where addressed: Biodiversity Development Assessment Report – Appendix E; Visual Impact Assessment – Appendix I; Agricultural Impact Assessment – Appendix H.	Impacts on biodiversity; Visual impacts; Economic and policy objections	
SE-86486713	This plan is Economic Suicide by Ideology. Shutting down coal without any viable alternative is pure madness. This isn't a transition, its a demolition!	The submission raises policy-level objections regarding Australia's energy transition. These matters extend beyond the scope of the site-specific assessment of the Finley BESS. The project has been assessed on its individual merits and is consistent with relevant NSW strategic planning and energy policy frameworks. These issues have been addressed previously in this Submissions Report. Where addressed: EIS Section 2.	General objection to renewable energy infrastructure	
SE-86486715	This plan has No Cost-Benefit Analysis, No Accountability! Billions are being funnelled into renewable JUNK with no engineering facts, no factual grid modelling, no full-cycle environmental assessment, and zero consequences for failure.	The EIS assesses the environmental, social and economic impacts of the proposal in accordance with the EP&A Act and the SEARs. Matters relating to broader electricity market economics and national energy investment decisions are outside the scope of this SSD assessment. These matters have been addressed previously in this Submissions Report.	General objection to renewable energy infrastructure	

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		Where addressed: EIS Section 2.		
SE-86487211	This isn't about energy " its about control. Weakening Australia's grid while empowering the Chinese Communist Party is not just foolish " its national sabotage.	National security and electricity market governance are matters regulated at the Commonwealth and State policy level and are not matters determined through this SSD assessment. Site-specific risks and operational security have been assessed through hazard, bush fire and security considerations in the EIS. These matters have been addressed previously in this Submissions Report. Where addressed: EIS Section 6; Preliminary Hazard Analysis – Appendix M.	Social impacts / community wellbeing; General objection to renewable energy infrastructure	
SE-86505708	I object to this anti-Australian, Environmentally Destructive, Insecure & Life Threatening Disaster!	The submission does not identify specific site-based impacts. The proposal has been assessed on its merits through the EIS and supporting technical studies and is considered acceptable subject to the implementation of mitigation measures outlined in Appendix B . Where addressed: EIS Sections 2 and 6.	General objection to renewable energy infrastructure	
SE-86506207	Energy Poverty Junk like this Finley BESS is costing us a fortune, is wrecking our economy, poisoning our healthy uncontaminated land & destroying our national security.	Potential contamination risks have been assessed through the Water Impact Assessment and hazard studies, which concluded that, with best-practice controls, the proposal is not expected to result in adverse impacts on land or water. Economic and national security concerns are policy-level matters and have been addressed previously in this Submissions Report. Where addressed: Water Impact Assessment – Appendix L; Preliminary Hazard Analysis – Appendix M.	Pollution or contamination risks; Social impacts / community wellbeing	
SE-86506210	No Thanks!! Everyone knows Finley BESS is Toxic Rubbish that would be life threatening from thermal runaway! Australia has FAR SUPERIOR, RELIABLE AFFORDABLE COAL INSTEAD - THATs GREAT FOR AUSTRALIA!	Fire and safety risks have been comprehensively assessed through the Preliminary Hazard Analysis and Bush Fire Assessment. These assessments concluded that risks can be managed to acceptable levels through design, separation distances, detection systems and emergency response planning. Where addressed: Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N.	Project risk (including fire, safety and hazards)	

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SE-86506212	THIS IS AN UNETHICAL STORM OF NEGLECT AND ABUSE OF NATURE. ITS ALL PAIN & NO GAIN FOR AUSTRALIA AS ENERGY POVERTY RENEWABULLS ARE THE ASBESTOS OF THE FUTURE! This plan shows a lack of care that demonstrates reckless disregard for the safety or lives of others, which is so great it appears to be a conscious violation of other people's rights to safety.□ Three things are clear about the diabolical NSW renewable infrastructure roadmap & Federal Directives: Many landscapes will never be the same; Electricity will become more expensive and less reliable; None of this will alter the climate and Australia will soon be under the Control of our most Hostile Enemy - the Chinese Communist Party As Patricia Adams so aptly states in China's Energy Dream – Carbon dioxide reduction only makes sense for those China wishes to harm & supplant. https://www.thegwpf.org/content/uploads/2021/12/Adams-Chinas-Energy-Dream.pdf Its glaringly obvious that: Renewables are a Trojan Horse for Socialism masquerading as Environmentalism Weather dependent stuff CANNOT deliver power on demand " but guarantees Economic Misery, Environmental Destruction and Community Disruption. According to the most credible Electrical Engineering Experts this incapable, Toxic BESS plan & NSW Renewa Bull Infrastructure Roadmap - orchestrated by the Climate Change Authority Chair - who was previously the Coalition NSW Energy Minister & Treasurer - can only be described as SHAMBOLIC POLICY MAKING, DANGEROUS TO GRID OPERATION & TOTALLY MAD! Even worse, the heart of this disaster is in the SW emanating from the INSIDIOUS DINAWAN SUBSTATION !. with ex Cheung Kong Infrastructure Spark Infrastructure & TransGrid Running dodgy ENERGYCO & the CLIMATE CHANGE AUTHORITY CHAIRs previous, dodgy Energy Policy Director has somehow snagged a spot on the NEM ~EXPERT PANEL & his Delusional Executive Director Energy at NSW Treasury in 2023 is now acting CEO of the Australian Energy Market Commission (AEMC)- SETTING AUSTRALIAS ELECTRICITY RULES!! THIS IS AN INCESTUOUS, FAKE GREEN SWAMP - AGAINST AUSTRALIAs BEST INTERESTS - WITH VESTED INTEREST TENTACLES ALL BENEFITING THE GREEDY FAKE GREEN GRAVY TRAIN, GLOBAL ELITE & CHINA! This plan DEFIES:- *Every aspect of the NATIONAL ELECTRICITY LAW OBJECTIVE. The objective of the National Electricity Law is to promote efficient investment in, & efficient operation and use of, electricity services for the long term interests of consumers with respect to:-	Potential PFAS and contamination risks have been assessed through the Water Impact Assessment and hazard studies, which concluded that the proposal is not expected to result in adverse impacts to soil or water. Food production and agricultural impacts were assessed in the Agricultural Impact Assessment, which concluded that the development site is limited, reversible and would not compromise ongoing agricultural productivity. Broader objections relating to national energy policy and governance have been addressed previously in this Submissions Report. Where addressed: Water Impact Assessment – Appendix L; Agricultural Impact Assessment – Appendix H; Social Impact Assessment – Appendix O.	Social impacts / community wellbeing; General objection to renewable energy infrastructure	

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	(a) price, quality, safety, reliability and security of supply of electricity; and (b) the reliability, safety and security of the national electricity system; and (c) the achievement of targets set by a participating jurisdiction (i) for reducing Australias greenhouse gas emissions; or (ii)that are likely to contribute to reducing Australias greenhouse gas emissions. ~AEMO, AER, AEMC, Energy Ministers, Networks, Generators & everyone in 'authority', place primacy on emissions target rather than the other requirements of the NEL. The emissions requirement was only added to the NEL in Sep 2023, and the NSW Emissions Reduction Act 2023 was only passed in Nov 23(other states were similarly tardy to legislate any targets),- so on what basis did any Gov act prior to that to impose all this on us? Yet they all did, and still emphasise emissions over other objectives. NEL is made in the SA Parliament, and in the 2nd reading,the Minister there also reiterated that ALL OBJECTIVES ARE EQUAL.™ *Australian Drinking Water Guidelines The National Health and Medical Research Council (NHMRC) has drafted an update of the PFAS Fact Sheet within the Guidelines that includes revised and newly established health-based guideline values. The draft PFAS fact sheet is supported by a NHMRC Statement on PFAS in drinking water, which provides a summary of the findings that informed the update. The PFAS reviewed as part of the recent update include perfluorooctanoic acid (PFOA); perfluorooctane sulfonic acid (PFOS); perfluorohexane sulfonic acid (PFHxS); perfluorobutane sulfonic acid (PFBS) and hexafluoropropylene oxide dimer acid and its ammonium salt (GenX chemicals). Further information on the NHMRC Review of PFAS in Australian drinking water (https://www.nhmrc.gov.au/health-advice/environmental-health/water/PFAS-review) is available on the NHMRC website. An IMMEDIATE MORATORIUM ON THE WHOLE RENEWABLE/INTERCONNECTOR NIGHTMARE IS ESSENTIAL. A COMPREHENSIVE INDEPENDENT AUDIT into all supply chains, personnel, and third-party advisors involved"with a specific focus on identifying anyone subject to the CCP™s National Intelligence Law; A ROYAL COMMISSION into the ideological capture, governance failures, and systemic conflicts of interest across AEMO, AER, AEMC, and other so-called independent energy bodies is essential. A RETURN TO AN ENERGY POLICY BASED ON NATIONAL INTERESTS"affordable, safe, secure, sovereign energy rooted in our existing coal-based assets, not the fantasy of renewables. Australia cannot afford another day of sabotage disguised as ~Net Zero,™ ~sustainability,™ ~emissions reduction,™ ESG Agenda			

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	**World Health Organization now lists two PFAS as carcinogens or possible carcinogens: perfluorooctanoic acid (PFOA) as a Group 1 carcinogen and perfluorooctanesulfonic acid (PFOS) as a Group 2B carcinogen. **A range of PFAS is also subject to the Stockholm Convention for the protection of human health and the environment from persistent organic pollutants (POPs) (ie, PFOS, PFHxS, PFOA and potentially all long chain perfluoroalkyl carboxylic acids). **COMMONWEALTH PFAS BAN Some types have been found to be toxic to human health and the environment. In its most definitive regulatory action taken to date, the Commonwealth has effectively banned the import, use and manufacture of some of the more prominent types of PFAS (PFOS, PFOA and PFHxS) *Finley BESS defies the Paris Agreement. Taking over farmland to build facilities to produce intermittent energy is a violation of Article 2, Section 1(b) of the Paris Agreement (2015). Article 2 1(b) of the 2015 Paris Agreement states: This Agreement... aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by: (b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, IN A MANNER THAT DOES NOT THREATEN FOOD PRODUCTION; See: https://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf. *Renewable DO NOT CO-EXIST WITH FOOD PRODUCTION AS THEY ARE THE ASBESTOS OF THE FUTURE - Defying:- Livestock Production Assurance Program The particular question is 2.8 of the "Food Safety on Your Property" section. *Do livestock have access to leaking electrical transformers, capacitors, hydraulic equipment, solar panels, wind turbines, coal seam gas structures or coal mine wastes?"* - Yes - No - I am now aware and making plans to restrict access https://www.facebook.com/groups/2147446775628698/posts/2222816628091712/https://m.facebook.com/story.php?story_fbid=2222816628091712&id=2147446775628698			

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	**TMForever chemicals™ used in Lithium Ion Batteries Threaten Environment, Research Finds Lithium-ion batteries The Guardian 14/7/24 https://www.theguardian.com/technology/article/2024/jul/14/forever-chemicals-lithium-ion-batteries-environment **Safety of Grid Scale Lithium-ion Battery Energy Storage Systems The scale of Li-ion BESS energy storage envisioned at mega scale energy farms is unprecedented and requires urgent review. The explosion potential and the lack of engineering standards to prevent thermal runaway may put control of battery fires beyond the knowledge, experience and capabilities of local Fire and Rescue Services. BESS present special hazards to fire-fighters . https://www.researchgate.net/publication/352158070_Safety_of_Grid_Scale_Lithium-ion_Battery_Energy_Storage_Systems **Grid Scale Batteries & Fire Risk https://static1.squarespace.com/static/656f411497ae14084ad8d03a/t/66fd2383b56dbc6906390297/1727865736681/Fannon-Batteries.pdf **Disaster Moss Landing: The Risk of Battery Storage - YouTube - 16/1/25 https://www.youtube.com/watch?v=xuTaZFQA18E **https://wattsupwiththat.com/2025/02/20/massive-green-battery-plant-catches-on-fire-again-weeks-after-major-toxic-blaze/ **https://localnewsmatters.org/2025/02/13/environmental-tests-reveal-elevated-levels-of-toxic-metals-since-moss-landing-battery-fire/ **https://www.sfgate.com/news/bayarea/article/environmental-tests-reveal-battery-metals-around-20163514.php **https://www.cbsnews.com/sanfrancisco/news/elevated-levels-heavy-metals-elkhorn-slough-lithium-battery-facility-fire/ **Battery recycling plant explodes - twice. (What it means for you.) Auto Expert John Cadogan - YouTube https://www.youtube.com/watch?v=0-nzOJ01Fkc **https://www.fire.nsw.gov.au/page.php?id=9402 There is a general lack of guidance and provisions in building codes, standards, and legislation in relation to safety to address the potential risks from these emerging technologies. Part of the			

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	problem is that we do not yet know enough about their probability of failure, their mechanisms of failure and potential consequences of failure. **PFOS and PFOS-related chemicals are still being produced for regulated uses (primarily in China) https://greensciencepolicy.org/our-work/building-materials/pfas-in-building-materials/ ** PFOS Chemicals are just as bad for wildlife as they are for humans. Tests have found that even small levels of contamination can lead to compromised immune systems and brain asymmetry. https://www.completehomefiltration.com.au/difference-between-pfas-and-pfos/			
SE-86506457	We™re all sick to death of the unethical, Fake Green Ruinable Nightmare that's all powered by slave labour supply chains just like predatory TransGrid!	The Applicant acknowledges the concern raised regarding ethical supply chains and labour practices. While the Applicant does not manufacture battery components, procurement and contracting for the Finley BESS will be undertaken in accordance with applicable Australian legislation and standard contractor governance requirements. Matters relating to modern slavery and ethical supply chains have been addressed previously in this Submissions Report, including commitments relating to procurement and contractor expectations. Where addressed: Social Impact Assessment – Appendix O. Applicant commitments / mitigation measures: As outlined previously in this Submissions Report, the Applicant commits to: > Procurement and contracting to be undertaken in accordance with the Modern Slavery Act 2018 (Cth) and other applicable legislation; > Requiring principal contractors and relevant subcontractors to comply with ethical sourcing and labour standards through contractual arrangements; and > Incorporating expectations regarding lawful and ethical conduct into contractor induction and compliance processes.	Adequacy of consultation; Social impacts / community wellbeing	
SE-86506461	Nobody in their right mind would plan or approve this extremely Toxic, Fire Hazard right near the essential Mulwala Canal - as well as two other BESS & a land/water poisoning Solar ~DUMP nearby - unless they intended to cause extensive harm to rural Australia & the Public!	Fire and hazard risks associated with the Finley BESS have been comprehensively assessed through the Preliminary Hazard Analysis and Bush Fire Assessment Report, which considered credible incident scenarios and identified design, separation, detection and emergency response controls. Potential contamination pathways to surrounding land and water have been assessed in the Water Impact Assessment, which concluded that, subject to implementation of best-practice controls, the proposal is not expected to result in adverse impacts on surface water, groundwater or surrounding land. Cumulative considerations are addressed within the EIS assessment framework, noting that the Finley BESS is a defined project footprint and is required to implement standard environmental management and emergency response measures to manage site-specific impacts regardless of other surrounding proposals.	Project risk (including fire, safety and hazards); Pollution or contamination risks; Water impacts; Cumulative impacts	Thermal runaway / fire risk; Contamination of irrigation infrastructure (Mulwala Canal) and farmland; Cumulative development concerns

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		Where addressed: EIS Section 6; Water Impact Assessment – Appendix L; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N; Social Impact Assessment – Appendix O. Mitigation measures / Applicant commitments: > Bunding/containment of potential contamination sources and segregation of stormwater runoff; > Spill prevention and emergency response procedures (including spill kits and regulator notification processes where required); > UL9540A-informed clearances, fire detection/protection systems and emergency shutdown capabilities; and > Bushfire management measures, including APZ maintenance, emergency access and dedicated firefighting water supply.		
SE-86513457	Finleys farmland should feed communities”not host an industrial-scale 1.6~GWh BESS that locks up soil for decades How will the developer guarantee this land is returned to production?	The Finley BESS has a limited development site and has been sited on land currently used for agricultural activities. Agricultural impacts have been assessed in the Agricultural Impact Assessment and Land Use Conflict Risk Assessment, which identify that the project is reversible and that long-term land use conflict can be minimised through implementation of mitigation measures and decommissioning commitments. The EIS identifies that a detailed decommissioning plan would be prepared prior to the end of the operational life to ensure removal of infrastructure and rehabilitation of the site, enabling return to its former use. The Applicant’s approach to decommissioning is therefore intended to ensure that the land can be returned to agricultural production following project decommissioning. Where addressed: EIS Section 6; Agricultural Impact Assessment – Appendix H; Land Use Conflict Risk Assessment – Appendix G. Mitigation measures / Applicant commitments: > The reversibility of the project and rehabilitation to facilitate return to the existing land use; and > Decommissioning commitments to remove infrastructure and rehabilitate the land to enable return to agricultural use.	Impacts on agricultural land uses; Decommissioning information	Loss of productive agricultural land; Reversibility and return-to-use commitments

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SE-86594206	The risk of lithium-ion battery fires is well-documented globally, with Australia, South Korea, and the U.S. recording several catastrophic events. How will Avenis prevent, contain, and extinguish a thermal runaway fire at the Finley BESS without releasing PFAS or toxic firewater into local farmland?	Fire risk and thermal runaway scenarios have been assessed in the Preliminary Hazard Analysis and Bush Fire Assessment Report, which identify prevention, detection and response measures including separation distances, fire protection systems, monitoring and emergency response planning. Potential contamination pathways (including runoff) have been assessed in the Water Impact Assessment, which identifies bunding/containment, segregation of runoff, spill response procedures and a SWMP/CEMP framework to manage contamination risk during construction and operation. These assessments concluded that, with implementation of the mitigation and management measures identified in the EIS, risks can be managed to acceptable levels and the proposal is not expected to result in adverse impacts to surrounding land or water. Where addressed: EIS Section 6; Water Impact Assessment – Appendix L; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N. Mitigation measures / Applicant commitments: > BESS units installed and tested in accordance with UL9540A outcomes and manufacturer requirements; > Fire detection/protection systems and emergency shutdown capability; > Bunding/containment measures and segregation of stormwater runoff to manage contamination risk; and > SWMP/CEMP spill response procedures and emergency management measures.	Project risk (including fire, safety and hazards); Pollution or contamination risks; Impacts on agricultural land uses; Water impacts	Thermal runaway / fire prevention and response; Firewater runoff / contamination controls
SE-86594207	The risk of lithium-ion battery fires is well-documented globally, with Australia, South Korea, and the U.S. recording several catastrophic events. How will Avenis prevent, contain, and extinguish a thermal runaway fire at the Finley BESS without releasing PFAS or toxic firewater into local farmland?	As above.		
SE-86594212	Finleys flat, open farmland allows fire and smoke to spread rapidly in high winds. Have you modelled smoke plume and heat radiation scenarios for worst-case battery fire conditions in local summer climate?	Credible incident scenarios for the Finley BESS, including fire-related hazards, have been assessed through the Preliminary Hazard Analysis and Bush Fire Assessment Report. These assessments considered risk pathways and identified prevention and response controls to minimise the likelihood and consequence of an incident, including separation distances, detection systems and emergency response measures. The SSD assessment framework is focused on whether risks can be managed to acceptable levels through design and operational controls. The EIS and supporting hazard/bush fire assessments conclude that, subject to implementation of the identified mitigation and emergency	Project risk (including fire, safety and hazards); Pollution or contamination risks; Social impacts / community wellbeing	Smoke, plume and heat radiation considerations;

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		management measures, residual risks associated with the proposal can be managed to acceptable levels and as low as reasonably practicable. Where addressed: EIS Section 6; Preliminary Hazard Analysis – Appendix M; Bush Fire Assessment – Appendix N. Mitigation measures / Applicant commitments: > UL9540A-informed clearances to prevent propagation; > Fire detection/protection systems and emergency shutdown capabilities; > Dedicated firefighting water supply and emergency access; and > Preparation and implementation of the Bush Fire Emergency Management and Operations Plan (BEMOP).		
SE-86675223	Re: Objection to the Proposed Finley Battery Energy Storage System Location: Adjacent to the Mulwala Irrigation Channel, Finley, NSW Dear Sir/Madam, I write to formally object to the proposed Finley Battery Energy Storage System (BESS), located adjacent to the Mulwala Irrigation Channel in the Berrigan Shire. The Mulwala Canal is a significant irrigation systems, supplying water to agricultural enterprises across the Murray Irrigation District. Placing a large-scale battery energy facility immediately adjacent to this vital channel introduces unacceptable risk of chemical or electrolyte leakage into the water system, thermal events or battery fires leading to the release of toxic fumes or contaminated runoff, and damage or disruption to irrigation infrastructure during construction or in the event of equipment failure. This location poses a direct threat to agricultural water security, public health, and regional food production. Battery Energy Storage Systems have been associated with thermal runaway incidents and significant fire risk. In the event of a fire, access for fire crews near an open irrigation channel may be constrained. Runoff from suppression efforts could pollute the watercourse. There is a serious risk of toxic gases and contaminated water entering the irrigation network that supplies local crops, livestock, and potentially drinking water. These risks have been widely acknowledged in industry literature and recent fire events. The Mulwala Canal supports a range of aquatic life, birds, and nearby farmland ecosystems. Construction and operation of an industrial energy facility risks introducing sediment, pollutants, and noise during sensitive times such as the irrigation season. It may impact groundwater quality and aquatic habitats and has not yet demonstrated robust environmental safeguards for waterways of this significance. There is insufficient evidence to suggest that the proposed location is the most suitable or lowest-risk site available in the region. It does not appear to have adequately considered cumulative impacts on water, biodiversity, and neighbouring land uses, nor does it demonstrate alignment with best-practice siting guidelines for large battery systems in proximity to sensitive	Potential impacts on surface water, groundwater and irrigation infrastructure have been assessed in the Water Impact Assessment, including construction and operational risk pathways and the management framework for sediment control, spill prevention and response, bunding/containment and stormwater controls. The Water Impact Assessment concludes that, subject to implementation of best-practice environmental management measures (including a CEMP and supporting plans), the proposal is not expected to result in significant impacts on surface water quality, erosion, sedimentation or groundwater-dependent ecosystems. Fire and hazard risks, including credible incident scenarios for battery energy storage systems, have been assessed in the Preliminary Hazard Analysis and Bush Fire Assessment, which identify design and operational controls to minimise likelihood and consequence, including separation distances, monitoring and emergency response provisions. These assessments conclude that risks can be managed to acceptable levels through implementation of the mitigation measures. Potential biodiversity impacts have been assessed in the BDAR, including habitat and fauna considerations. The BDAR identifies mitigation to avoid and minimise impacts and manage residual effects. The EIS also documents consultation undertaken with agencies and stakeholders, including engagement relevant to irrigation infrastructure, and commits to ongoing consultation through detailed design and delivery. Requests for a project “halt” and broader policy arguments regarding site selection and subsidies are noted. Under the EP&A Act assessment framework, the proposal is assessed on its merits against the SEARs and specialist studies. The EIS concludes that the proposal is acceptable subject to mitigation and management measures, outlined in Appendix B.	Pollution or contamination risks; Project risk (including fire, safety and hazards); Water impacts; Impacts on agricultural land uses; Cumulative impacts; Adequacy of consultation	Proximity to irrigation infrastructure (Mulwala Canal); Thermal runaway / firewater runoff; Surface water / groundwater protection; Precautionary principle / alternatives

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	infrastructure and farmland. I respectfully request that the current proposal be halted until an independent environmental and water safety risk assessment is completed. A full cumulative impact assessment should be undertaken, including fire, flooding, chemical, and ecological risk. Alternative, lower-risk sites should be considered further from critical infrastructure. The local irrigation community, water agencies, and independent hydrologists must be formally involved in the assessment and consultation process. Given the scale of potential impact, the precautionary principle must be applied. Water resources, food security, and environmental health must not be compromised for energy storage convenience.	Where addressed: EIS Section 5 EIS Section 6 Water Impact Assessment – Appendix L Preliminary Hazard Analysis – Appendix M Bush Fire Assessment – Appendix N Biodiversity Development Assessment Report – Appendix E Social Impact Assessment – Appendix O Engagement Outcomes Report – Appendix R Mitigation measures / commitments: > spill prevention and emergency response procedures; > bunding/containment of potential contamination sources; > stormwater segregation and erosion/sediment controls through a CEMP/SWMP framework; and > hazard and bushfire emergency management measures.		
SE-86753714	Lithium battery fires often require hundreds of thousands of litres of water, far more than standard tanks store. Where will the site store its required 200,000–250,000-L of dedicated firewater, and how will it be maintained in drought conditions?	Fire and emergency response planning for the Finley BESS has been assessed through the Bush Fire Assessment and Preliminary Hazard Consistent with Planning for Bush Fire Protection 2019 (PBP 2019), the project commits to providing an on-site static water supply of at least 75,000 L dedicated solely for firefighting purposes, fitted with Storz fittings and strategically located to ensure safe and effective access by firefighting vehicles. This dedicated supply is independent of town water or irrigation infrastructure and is intended to ensure emergency response capability is maintained during drought conditions. In addition, a Bush Fire Emergency Management and Operations Plan (BEMOP) will be prepared prior to operation, detailing emergency response procedures, water availability, access arrangements and coordination with emergency services. The Bush Fire Assessment concludes that, subject to implementation of these measures, bushfire and emergency response risks can be managed to an acceptable level. Where addressed: EIS Section 6 Bush Fire Assessment – Appendix N Preliminary Hazard Analysis – Appendix M Mitigation measures / commitments:	Project risk (including fire, safety and hazards); Water impacts	Firefighting water supply and drought resilience

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		> on-site static water supply dedicated for firefighting purposes (including fittings as specified); and > preparation and implementation of emergency management measures (including the BEMOP).		
SE-86821959	Toxic gases like hydrogen fluoride and carbon monoxide can be emitted in battery fires. Will the site include active gas monitoring and alarms for local residents and responders?	Potential emissions associated with a battery fire, including toxic gases, were assessed as part of the Preliminary Hazard Analysis and Bush Fire Assessment. These assessments considered credible worst-case scenarios and appropriate design and operational controls. Gas detection, fire detection, alarm systems and emergency shutdown mechanisms are incorporated within the BESS units in accordance with manufacturer specifications and UL9540A testing requirements. Emergency response arrangements, including coordination with emergency services and site access, are detailed in the emergency management framework. This matter has been addressed previously under project risk and fire safety. Where addressed: EIS Section 6 Preliminary Hazard Analysis – Appendix M Bush Fire Assessment – Appendix N Mitigation measures / Applicant commitment: > Implementation of manufacturer-specified detection, alarm and shutdown systems, and preparation of a Bush Fire Emergency Management and Operations Plan (BEMOP), to manage fire and emission risks.	Project risk (including fire, safety and hazards)	Fire emissions and emergency response
SE-86825212	There is no mention of independent third-party fire safety testing. Will the developer conduct full-scale thermal runaway tests at similar capacity and publish the results?	Fire safety performance of the proposed BESS technology has been assessed through industry-standard testing regimes, including UL9540A testing, which informs container spacing, fire propagation controls and protection systems. Compliance with applicable standards and certification requirements is a condition of installation and operation. This issue has been addressed previously in relation to hazard assessment and regulatory compliance. Where addressed: EIS Section 6 Preliminary Hazard Analysis – Appendix M Mitigation measures / Applicant commitment: > The Applicant commits to installing BESS units that have been tested and certified in accordance with UL9540A and manufacturer specifications.	Project risk (including fire, safety and hazards)	Technical standards and certification

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SE-86830207	Battery facilities require regular water for cooling, testing, and washing, but this use is not disclosed. How much water will the site use per month, and how will it be sourced without impacting nearby farms or aquifers?	Operational water requirements for the Finley BESS are minimal and intermittent and do not involve continuous water consumption. As outlined in the EIS and Water Impact Assessment, the proposal does not rely on irrigation water, town water supply or groundwater extraction for routine operation. Water use associated with the development is limited primarily to construction activities and emergency response preparedness, which have been assessed having regard to local water availability and existing irrigation infrastructure. The assessment concluded that, subject to implementation of standard environmental management measures, the proposal would not result in adverse impacts on surrounding agricultural land, irrigation infrastructure or water resources. This matter has been addressed previously in submissions relating to water availability and water quality. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L	Pollution or contamination risks	Water use and resource management
SE-86831957	Water availability is critical during droughts, which are common in the Riverina. Will you guarantee a drought-contingency plan ensuring water for emergencies without drawing from town or irrigation supply?	The project does not rely on ongoing water extraction for operation. Emergency water requirements are addressed through a dedicated on-site static firefighting water supply consistent with PBP 2019. This supply is independent of irrigation and town water systems and ensures emergency response capability during drought conditions. This concern has been addressed previously under fire and water management. Where addressed: Bush Fire Assessment – Appendix N Water Impact Assessment – Appendix L	Pollution or contamination risks	Drought resilience and emergency water supply
SE-86832708	Water Supply & Storage Where will the 228,000-L fire suppression supply be stored or sourced? Is it mains, recycled wastewater, or well-based, and what's the redundancy plan if the primary fails?	Consistent with PBP 2019, the Finley BESS will provide an on-site static water supply of at least 75,000 L dedicated to firefighting, fitted with Storz fittings and accessible to emergency services. The supply is independent of irrigation infrastructure and forms part of the site's emergency response design. This issue has been addressed previously. Where addressed: Bush Fire Assessment – Appendix N	Project risk (including fire, safety and hazards)	Emergency infrastructure
SE-86843962	Testing Protocols How frequently will suppression systems be tested, and how are these tests tracked and reported? Including water usage and system integrity?	Fire detection and suppression systems will be maintained and tested in accordance with manufacturer requirements and emergency management procedures. Testing and maintenance protocols form part of the Environmental Management System (EMS). This matter has been addressed previously under operational risk management.	Project risk (including fire, safety and hazards)	Operational management and monitoring

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		Where addressed: EIS Section 6 Preliminary Hazard Analysis – Appendix M		
SE-86847719	What Stormwater & PFAS Management is in place? What infrastructure or procedures are in place to ensure collected firewater runs through PFAS treatment or storage ponding to prevent groundwater or farm supply contamination?	Pollution and contamination risks, including spills and emergency events, were assessed through the Water Impact Assessment and hazard studies. The design incorporates bunding, stormwater segregation and spill response procedures to prevent contaminated runoff entering surrounding land or waterways. Firewater and spill management procedures form part of the emergency and environmental management framework. This concern has been addressed previously. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L Preliminary Hazard Analysis – Appendix M	Pollution or contamination risks	Spill containment and water quality protection
SE-86857707	Thorough research has not been done on the contamination of the materials to use to build and host a BESS to the soils and water. It is located especially too close to the Mulwala Irrigation channel. Not to mention high fire risk. Finley can have extreme hot weather. Due diligence to the environmental, social and agricultural impact has not been done. Take away subsidies as well and see if this project can be worth it, after environment impact on the soils and water has been thoroughly done, especially by independent researchers please.	Potential impacts to soils and water were assessed through the Water Impact Assessment and Preliminary Site Investigation. These assessments establish baseline conditions and confirm the suitability of the site, as well as informing future decommissioning and rehabilitation. The studies conclude that, subject to implementation of mitigation measures, the proposal does not pose an unacceptable risk to soil or water quality. This issue has been addressed previously across multiple submissions. Where addressed: EIS Section 6 Water Impact Assessment – Appendix L Preliminary Site Investigation – Appendix I	Pollution or contamination risks	Land and water quality protection
SE-86859958	What is being put in place for Cooling & Maintenance Usage? How do you quantify routine operational and environmental water use, and will these figures be published monthly for community insight?	Operational water use for the Finley BESS is limited and ancillary in nature, associated primarily with equipment maintenance rather than continuous cooling processes. The Water Impact Assessment confirms that the proposal does not require routine operational water draw from town water, irrigation supply or groundwater systems. Pollution and contamination risks associated with operational activities have been assessed and appropriate controls identified. This matter has been addressed previously in submissions relating to water availability and water quality. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L Mitigation Measures – Appendix B	Pollution or contamination risks	Operational water use

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SE-86863217	Is there alway to be a Host-Landholder Water Burden? As the landholder bears land-use change, what guarantees will you provide that this BESS wont strain local water supplies during drought or dry periods? Is the developer match dollars for decommissioning?	The EIS confirms that the Finley BESS will not place an ongoing burden on local water supplies during drought or dry periods, as the development does not rely on irrigation allocations or potable town water for routine operation. The project is temporary and reversible, with land capable of being returned to agricultural use following decommissioning. Decommissioning obligations are addressed through planning controls, consent conditions and landholder agreements, ensuring the site is rehabilitated at the end of the operational life. This matter has been addressed previously in submissions relating to agricultural impacts and water availability. Where addressed: EIS Section 6.4 Agricultural Impact Assessment – Appendix H Water Impact Assessment – Appendix L Mitigation Measures – Appendix B	Impacts on agricultural land uses	Water availability and decommissioning responsibility
SE-86863469	You crazy adult are making bad decisions and this junk will be let to my generation to clean up Thanks for nothing. Regards the next generation	Social impacts, including intergenerational considerations, were assessed in the Social Impact Assessment. The project has been designed as a reversible land use with defined operational and decommissioning stages to avoid long-term environmental or land use burdens on future generations. This matter has been addressed previously in submissions relating to social impacts. Where addressed: EIS Section 6.11 Social Impact Assessment – Appendix O Decommissioning measures – Appendix B	Social impacts / community wellbeing	Intergenerational equity and legacy impacts
SE-86863707	Routine water use is excluded from your Environmental Impact Statement. Will you publish annual water usage reports and disclose this data publicly to ensure transparency?	Routine operational water use has been assessed as negligible and does not represent a material environmental risk. Monitoring and reporting obligations will be governed by consent conditions and the Environmental Management System. This matter has been addressed previously in submissions relating to water use and water quality. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L Environmental Management Framework – Appendix B	Pollution or contamination risks	Transparency of water use
SE-86863967	PFAS has been linked to health issues and groundwater contamination.	Pollution risks, including chemical handling and emergency response, have been assessed through the Water Impact Assessment, Preliminary Hazard Analysis and Bush Fire Assessment. Firewater and spill	Pollution or contamination risks	PFAS and hazardous substances

Submission ID	Submission	Applicant Response	Category	Sub-category
	Will Avenis commit to a PFAS-free site, including fire suppression foam, coating materials, and construction chemicals?	containment measures have been designed to prevent off-site migration of contaminants, including to irrigation infrastructure. This matter has been addressed previously in submissions relating to PFAS, contamination and firewater management. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L Preliminary Hazard Analysis – Appendix M Bush Fire Assessment – Appendix N		
SE-86889709	Stop spending taxpayers funds on BESS. The only beneficiary here is the proponent. All electricity consumers will pay huge prices for this gaming of the electricity market by these subsidy seekers. Give us 24/7 electricity and make sure suppliers to that market can supply for longer than 5 minutes. If we had an abundant supply of reliable electricity we would have lower prices and we need electricity generators that have a life of 50 plus years. How many diesel generators are backing up this project? What happens to the lithium batteries at end of life? Where is the land fill? Who is paying for this project to be completely rebuilt when the batteries are no longer efficient. Do the neighbours know that any fire in this BESS will belch toxic smoke over the environment and will be left to burn out as no amount of water will extinguish a battery fire on this scale?	The Finley BESS has been assessed as SSD and is consistent with Commonwealth and NSW energy policy frameworks aimed at improving electricity system reliability and supporting renewable energy integration. Funding mechanisms, electricity pricing and national energy policy settings are outside the scope of the planning assessment. End-of-life management of batteries and infrastructure has been addressed through decommissioning commitments, ensuring removal of infrastructure and site rehabilitation. Concerns regarding toxic smoke and fire behaviour have been assessed through hazard and bushfire studies, which establish separation distances, suppression systems and emergency response protocols. Many of the matters raised have been addressed previously in submissions relating to project justification, fire risk and decommissioning. Where addressed: EIS Section 2 EIS Section 6.10 Preliminary Hazard Analysis – Appendix M Bush Fire Assessment – Appendix N	General objection to BESS or renewable energy infrastructure	Energy policy, economics and end-of-life management
SE-86890209	Regional NSW is being invaded by the "renewable energy" subsidy seekers. This is yet another company seeking to profit from this complex electricity generation the Government wants us to believe is environmental. What is environmental about batteries? Lithium ion batteries have a short lifespan, lithium production is environmentally disastrous, no developer divulges the amount of diesel generators that must be used continuously in their project, no one counts the emission of transporting the components from other countries to Australia and lithium ion is not recyclable on the scale that is being planned for NSW (or Australia). We want abundant electricity that lowers our costs of living and allows us to run a business. Stop prioritising developers profits over NSW electricity consumers and tax payers. Stop destroying agricultural land. Stop destroying our environment.	Operational water requirements for the Finley BESS are minimal and intermittent and do not involve continuous water consumption. As assessed in the EIS and the Water Impact Assessment, the proposal does not rely on irrigation infrastructure, groundwater extraction or town water supply for routine operation. Water-related impacts, including potential contamination risks, have been assessed and are addressed through standard environmental management measures. This matter has been addressed previously in submissions relating to water availability and water quality. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L	Pollution or contamination risks	Operational water use; cooling and maintenance

Submission ID	Submission	Applicant Response	Category	Sub-category
SE-86890210	Finley BESS is planned right near the vital MULWALA IRRIGATION CHANNEL. Hey. Hey you. You in there ? Do you Eat ? Do you ? Do you Eat ? Or are you a robot who doesn't Eat. I Am Outraged you ignorant people have No Care At All toward: - All On Country Lands Waterways and Communities Australian and World's - us, your Fellow Australians - Waterways - Murray - Murray - Murray - yes, Murray. Murray Protect. Protect. Eh. Who are you ? Do you Eat ? You don't Care about what you Eat do you. Well I Do, Hey ! I Do. I am Disgusted at with gov.au, nsw.gov.au, vic.gov.au, Australians who Don't care about what they Eat. Well I Do and gov.au, nsw.gov.au, vic.gov.au are Destroying My Food Future I had in mind for Next 8 Generations into 500 years from now. I needed this Future: - Clean Waterways Future - Chemical Free Lands - Heavy Metal Free Lands and Waterways - Green Growth Future being these :- - Shelter Belts en masse rather than renewables - Swales to assist the Land gov.au, nsw.gov.au, vic.gov.au Drain Drain Drain and then claim climate change causes Droughts when It IS gov.au, nsw.gov.au, vic.gov.au, sa.gov.au, qld.gov.au, wa.gov.au, offering Inappropriate Land Management every Single day they remain Ignorant about the Driest Continent on Earth they are Not aware of is Australia, in their hands SADLY. Now you add BESS to Our, Australians Ours, Precious Precious Lands Waterways and Communities rural, you horrible people who don't care about Anyone nor Our Lands, Our Waterways, and Our Communities, Rural, being Destroyed by planning department nsw.gov.au, and That Is Correct. Get out of my Government you people who Don't Care about Their Food Or Water Or Life in Water nor Life as Wetland Species nor Life Itself. Where on Earth did you grow up ? Mars ? Well ? Go and live There then. There's No Life on Mars to Pollute and Cause Harm and Loss to. You people Disgust Me because you Don't Care. Well I do. You have Destroyed My Future Plans for Australia! How Dare You. I Demand BESS be Banned in Australia From This Day, 27th June 2025. Here's why :- https://sfstandard.com/2025/02/06/erin-brockovich-lawsuit-moss-landing-power-plant-fire/ Ohhh dear oh dear you People are SO Ignorant and a Threat to us All who Eat from The Lands and Waterways Murray Darling Basin Food Bowl Catchments.	Potential impacts on water availability and contamination risk have been assessed through the EIS and the Water Impact Assessment. The assessment concluded that the Finley BESS does not place ongoing demand on local water supplies during operation and would not adversely affect surrounding landholders, irrigation infrastructure or water quality, including during dry or drought conditions. Contamination risks associated with construction, operation and emergency scenarios have been assessed and are addressed through design controls and standard environmental management measures. This matter has been addressed previously in submissions relating to water availability and water quality. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L	Pollution or contamination risks	Water availability; drought conditions; landholder impacts

Submission ID	Submission	Applicant Response	Category	Sub-category
	I Vehemently Object To Finley BESS . I want an Investigation into Planning.nsw.gov.au Immediately Immediately Immediately because you will destroy My My My Food I Choose over and above overseas food I do NOT eat and Know Why. I Only Eat Australian Grown Only Chemical Free Pesticide Free GMO Free Wholefoods. What are You eating ? You must not eat well if you are planning BESS all over Our, Australians Ours, Precious Precious Farmlands including Murray Darling Basin Food Bowl Catchments!!! How Dare You Destroy My Vision for a Clean Green Environment in Australia Growing Green Plant life, Trees, Shelter Belts, Shade, Food Forests, Plantations for Future Generations, Wildlife Corridors, Forests. Shame on you All. Go and live in China and Hurry up. I dont want your Toxic Junk Future all over Our, Australians Ours, Precious Precious Farmlands including Murray Darling Basin Food Bowl Catchments. God Help Us In Australia. Help Us Be Free of our government Now. I Demand One Nation lead us Out of this Mess Labor gov.au have got us in and Will Never Take Responsibility For. Well you Better Be Fully Responsible for what you are Doing to Our, Australians Ours, Precious Precious Farmlands including Murray Darling Basin Food Bowl Catchments. Save the Murray. Save Australia. Ban BESS in Australia this Very Day 27th June 2025.			

Submission ID	Submission	Applicant Response	Category	Sub-category
SE-86890459	This project is a waste of money and will generate unrecyclable waste and use diesel generators for consistent operation given the unreliability of weather dependent generators. BUT it will generate lots of money for the proponent as they game the electricity market and get paid to smooth out the electricity grid given the unreliable wind and solar already in the system (for 2 hours max). How much slave labour/child labour will be used in the process to manufacture these lithium ion batteries? How many emissions are there in the mining of the raw materials for these lithium ion batteries? Or don't we count that because that all takes place in another country? No country in the world is building such a complex and expensive electricity system. Taxpayers and electricity consumers will suffer. Stop wrecking our economy and our environment.	Matters raised regarding electricity markets, subsidies, international supply chains and global emissions accounting are matters of policy and market regulation and fall outside the scope of assessment under the EP&A Act. Waste management and end-of-life considerations for the Finley BESS have been addressed in the EIS, including commitments to decommissioning and removal of infrastructure. Where addressed: EIS Section 6 Waste Management Principles – Appendix P	General objection to BESS or renewable energy infrastructure	Market impacts; supply chains; waste
SE-86891708	Microplastics from battery and cable casings can persist in soil and water for decades, What filtration or material containment systems are in place to prevent leaching of microplastics into farmland? When leached onto food producing farmland, how will this be cleaned up?	Potential risks associated with materials used during construction and operation were assessed through the EIS and Water Impact Assessment. Standard construction and operational controls are identified to minimise the risk of material degradation, spills or contamination. This matter has been addressed previously in submissions relating to contamination risks. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L	Pollution or contamination risks	Contamination
SE-86891967	There is no baseline PFAS testing required pre-construction. RE projects will be 99% responsible for the contamination. Will you fund and publish independent pre-project testing of groundwater and topsoil for PFAS to create a reference point?	Potential contamination risks have been assessed through the EIS and Water Impact Assessment, which establish controls to prevent impacts to soil and groundwater. The assessment concluded that, subject to mitigation, the proposal would not result in adverse contamination impacts. This matter has been addressed previously in submissions relating to contamination and water quality. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L	Pollution or contamination risks	PFAS
SE-86891973	Battery breakdown during storms or fire could release heavy metals, will be a huge health risk. How will you secure and weatherproof battery modules to prevent accidental environmental contamination?	Fire and hazard risks, including weather-related scenarios, were assessed through the Preliminary Hazard Analysis and Bush Fire Assessment. These assessments identify design, separation and emergency response measures to minimise risk. This matter has been addressed previously in submissions relating to fire and hazard risk.	Project risk (including fire, safety and hazards)	Weather events; battery integrity

Submission ID	Submission	Applicant Response	Category	Sub-category
		Where addressed: Preliminary Hazard Analysis – Appendix M Bush Fire Assessment – Appendix N		
SE-86891985	The site could be abandoned post-operation, leaving toxic waste behind it the end of use. Will you provide a legally binding decommissioning plan including full land rehabilitation and timelines?	The EIS commits to decommissioning of the Finley BESS at the end of its operational life, including removal of infrastructure and rehabilitation of the site to allow return to its former use. Where addressed: EIS Section 6 Waste Management Principles – Appendix P	Decommissioning information	
SE-86894210	Finley region is a major Food Bowl region of Australia NOT a site for the Failing renewable energy Circus that is Deliberately destroying Australia 's economy by the socialist government. When a fire starts in a BESS you cant put them out. I Object outright to this planned project Finley BESS	Concerns regarding national energy policy and the role of renewable energy fall outside the scope of assessment under the EP&A Act. Fire risk associated with the Finley BESS has been assessed through the EIS and supporting hazard studies, which conclude that risks can be managed to acceptable levels. Where addressed: EIS Section 6 Preliminary Hazard Analysis – Appendix M	General objection to BESS or renewable energy infrastructure	Energy policy; fire risk
SE-86896209	TO WHOM IT MAY CONCERN I object to the above as renewable energy is hazardous and will contaminate our regional environment and may catch fire and cause toxic smoke and asthma and asthma-like health hazards in that event. I am concerned at the huge risk of Thermal runaway " if there are summer fires, they will go for miles and could cause bush-fires like the Black Friday fires. Governments are asking for huge claims for PFAS contamination caused by the toxicity and leaching from infrastructure, and also the toxic smoke in a fire event. (This April 2025 Glasgow Scotland lithium recycling facility exploded for the second time and the toxicity is unbelievable " we are asking for similar reactions) This is forcing our Electricity Prices UP, contrary to the lies we are being told. It is NOT better or CHEAPER than coal-fired base-load power by any stretch. This is also a national security issue when our services and assets are owned or controlled from offshore.	Fire, safety and hazard risks associated with the Finley BESS, including thermal runaway, toxic smoke and emergency response, were assessed through the EIS, Preliminary Hazard Analysis and Bush Fire Assessment. These assessments considered credible worst-case scenarios and identified design, separation and operational controls to manage risk. Potential contamination risks, including those associated with firewater runoff, were assessed through the Water Impact Assessment and are addressed through spill containment, bunding and emergency response measures. Matters raised regarding electricity pricing, national security and broader energy policy fall outside the scope of assessment under the EP&A Act. These matters have been addressed previously in submissions relating to fire, contamination and policy considerations. Where addressed: EIS Section 6 Preliminary Hazard Analysis – Appendix M Bush Fire Assessment – Appendix N Water Impact Assessment – Appendix L	Project risk (including fire, safety and hazards)	Thermal runaway; toxic smoke; PFAS; national security
SE-86896214	Finley BESS poses an unacceptable contamination risk for the Mulwala irrigation channel and must not be allowed to proceed.	The proximity of the Finley BESS to the Mulwala Irrigation Channel has been specifically assessed through the EIS and the Water Impact Assessment. That assessment concluded that, subject to standard environmental management and spill response measures, the proposal	Pollution or contamination risks	Contamination

Submission ID	Submission	Applicant Response	Category	Sub-category
		would not result in adverse impacts on irrigation infrastructure or water quality. This matter has been addressed previously in submissions relating to water contamination risk. Where addressed: EIS Section 6.8 Water Impact Assessment – Appendix L		
SE-86896957	I object to this development including the necessity to follow a global agenda in order to achieve it. This is a huge fire risk, inviting thermal runaway, toxic smoke and PFAS contamination. This is NOT sustainable as you well know and is designed to transfer wealth from Australians to ,overseas entities. This will contaminate our regional environment building on the “renewa-bull” systems which are already in place. Renewabull power is exponentially expensive, and hazardous because of the inability of essential emergency services being allowed to attend fires, and that is a very high risk. The toxicity will contaminate the environment, and we live in a relatively toxic-free region and don’t need toxic fire risk, PFAS contamination or toxic smoke travelling for miles and miles on a breath of wind to cause health problems in thousands of people for which these companies will NEVER be liable. If they are, they’ll just sell to a friendly company and make themselves scarce and we’ll never be able to chase them for damages. What is in place to address these liabilities outlined above, when these corporations on-sell several times, thus avoiding liability, and the end of project clean-up? Nobody can ever answer these questions because there is especially NO BOND taken for the end of project cleanup or hazzard risks. Who says those companies won’t fold or bankrupt themselves after transferring all their assets to a parent corporation some years ahead, in preparation to fold and leave the liability with the local people or LGAs? Why is this government persisting with the expense of these systems? Why is it OK to put people living in regions at risk of fire, smoke and HIGH PRICES, when for example wind turbines require coal-based power to start, and solar doesn’t work at night or on cloudy days? The whole “Ruin-a-Bull” thing is total madness, pushed by government officialdom who are enticed, paid off, or just too stupid to understand that we are in for blackouts because these systems cannot, in a pink fit, cover for what we had with renewable coal. Yes, it IS renewable, contrary to what is shoved down our throats continually by govern-mental departments and climate-change idealists out to suck every tax dollar they can from Mums and Dads of Australia. How stupid will future generations think we were when they look at us having cut off our noses to spite ,our faces? This is the stupidity of this madness. Just last month we were told the power INCREASES were BECAUSE of the Ruin-a-Bull “renewables”!! We were promised that our power bills would DECREASE not increase, when governments everywhere began dismantling our quite effective power structure, beginning from the old regional County Council system we once had. That was “privatised” and we were told that power prices would be more	Fire and hazard risks associated with the Finley BESS have been assessed through the Preliminary Hazard Analysis and Bush Fire Assessment, which identify appropriate design and emergency response measures to manage risk to acceptable levels. Contamination risks have been assessed through the Water Impact Assessment and are addressed through spill containment and emergency response controls. Concerns regarding corporate ownership structures, liability transfer and national energy policy fall outside the scope of assessment under the EP&A Act. Fire and contamination risks raised have been addressed previously in submissions. Where addressed: Preliminary Hazard Analysis – Appendix M Bush Fire Assessment – Appendix N Water Impact Assessment – Appendix L	Project risk (including fire, safety and hazards)	Thermal runaway; PFAS

Submission ID	Submission	Applicant Response	Category	Sub-category
	competitive. They weren't, and aren't! Then, when it was further privatised, and unbundled as per the global agenda, POWER PRICES WENT UP EVEN FURTHER. Now, we are seeing the further extension of that agenda, because POWER PRICES HAVE GONE UP AGAIN, and will CONTINUE to do so. We're being asked to swallow the lie propagated by the UN and globalist corporations that "renewable" energy is more reliable than base-load clean burning coal. The World Bank and IMF, along with globalist corporate partners have promoted Deregulation, Privatization, Liberalization and Commodification of everything so that they could control it. Consequently, we've seen our utilities unbundled and bought up, and politicians have been stupid enough, or compromised with bribes etc, to accept this, when it quite clearly goes against simple common sense. Renewables are UNRELIABLE. The lies propagated are that "Renewable" energy is more reliable than base-load clean burning coal. It is NOT. By continuing with this lie, you are denying me, and people living in this State, and indeed, Australians, who pay taxes and generate enterprise, the right to available, constant and affordable power. You are complicit with politicians in effect murdering elderly people who die of heat and cold exposure because power is not available or affordable. This is a basic human right, and Australia, to it's deep shame, no longer supplies this to it's people, instead follows the dictates of globalists with another agenda. It is DENYING IT'S OWN NATIONAL ELECTRICITY RULES (7), to have an energy grid and service that is secure, reliable, safe and affordable. You have stolen this right from we, the people; propagated lies, done deals with huge corporate companies, and decommissioned productive land in order to fill with solar panels which don't work to capacity when it's too hot or cloudy, or dark. Unsightly wind towers manufactured in China mostly have been, and are being, put on productive land, or now, planned to be just offshore our beautiful coasts. The stupidity of AGL last year offering a great deal to EV owners to charge AT NIGHT for as low as \$5 AT NIGHT. How stupid is this? The sun don't shine at night, but we should all charge our highly flammable "slow-to-go-anywhere" EV's AT NIGHT, for a DISCOUNT!!!!!!!!!!!!!! Have you ever seen anything so stupid? Bird blending turbines and solar set-ups kill or disorient birds; turbines don't work when it's too windy, and solar systems don't work when it's too hot or not to capacity when cloudy anyhow. Electric vehicles are inefficient, and will take years to become efficient. People want to charge them at night when solar does not generate. They have proven lethal to emergency services workers being electrocuted when helping at accident scenes. It takes days to go where normal cars take hours to go, and the disposal of the batteries and componentry will be a nightmare. (In April 2025 a Glasgow battery recycling facility exploded for the second time throwing up a toxic chemical mess.) Overseas, insurance companies will not insure EVs, and multi-level car-parks are having the same problem, as the EVs catch fire, then catch cars, can't be extinguished, and just have to be left to burn out. Nothing compares to coal, which is actually much cleaner that you would have us believe with the technology we now have. It is also affordable, and people need affordable power, RELIABLE base-load power. We don't need you stealing assets of people, because this is a basic right we once enjoyed and contributed to. Now, it's commoditised to the point of "structural adjustment" (another UN term),whereby small business are going out of business because their power bills are too high. This is			

Submission ID	Submission	Applicant Response	Category	Sub-category
	THEFT, and no politician should be complicit in promoting it, and this project should not be allowed to go ahead because it will most certainly cost much more than is projected, and at the end of the day, the consumer will be required to pay for it. Worse still is the fact that our ELECTRICITY PRICES are being MANIPULATED UPWARDS because owners of these corporate power companies are recharging them on coal-fired baseload power in the middle ,of the day, and manipulating the market by holding back on selling it until peak power load demand, when they sell at a really high price. This escalates the price for everyone, because the highest price is the value parameter which becomes the criteria which sets the price for everyone. This is MARKET MANIPULATION and should be treated in the same way as INSIDER TRADING. It is CORRUPT, unconscionable, and corporate theft, aided and abetted by Governments In 2023 a hospital in WA was not running it's heating because it was too expensive, and people were cold. That's OK on the altar of stupidity, which apparently is renewable many times over. Furthermore, what are these corporates being paid for the unreliable, "renewable" power, compared with those who have solar on their roofs feeding into the grid? Please answer me that? I don't believe you can answer, because again, it is Anti-Competitive and these corporates, in cahoots with our own governments, are price-gouging. Corporates have their hands in many govern-mental pockets (how many kick-backs are in the system??), and are extorting the Australian people in various ways, not the least by denying them the same feed-in tariffs guaranteed to the corporations. They are receiving PREFERENTIAL TRADING benefits, which is against the intent of the Trade Practices Act/Competition and Consumer Act, States Fair Trading and Consumer Affairs legislation and even the Paris Agreement sets out that food security should not be threatened by these projects – and yet, we blatantly disregard this, to our own detriment, entombing and contaminating land. They've been allowed to set up on productive land, or land close to towns where they're close to existing power stations, instead of making them set up on vacant land well away from towns, and having to foot the bill for the lines to the feed-in points. But instead, it's being subsidised to the extreme by those who can least afford it, while these huge corporates receive subsidies. Worse than that is our reliance on slave labour for the componentry, and on Chinese manufacturing – at a time when top military people are cautioning us about the CCP. However, it's OK to allow the CCP to own a good slab our our energy infrastructure? Again this is madness, and is a threat to our food and energy security in itself, therefore, as it follows, our national security. Furthermore, just in May this year, a US report found that the electrical/computer components used in solar panels, turbines and associated equipment had KILL SWITCHES in them which would allow the CCP to SHUT DOWN our POWER GRID. This is totally unacceptable and a threat to our national security. With base-load coal, we pay Australians to work in coal-mines and power-plants, we do not need to rely on child/slave labour, which is apparently OK by the UN/global Gobbleopoly. With base-load coal, we do not threaten our small business / manufacturing / farming / entrepreneurial sectors, nor have to shut down heating or air-conditioning in hospitals, or "share" domestic and industrial power by turning off our appliances, manufacturing plants, or air-conditioning/heating. Remember, Warren Buffet said that "renewables" were not worth investing in – UNLESS they were subsidised. So, who are we fooling. Blind Freddy can see that it would be better, if we want to follow the solar route, to put solar panels on existing roofs, and just pay the people. However, the goal is more about control, and stealing from			

Submission ID	Submission	Applicant Response	Category	Sub-category
	the Australian people – a wealth transfer. Also, we now know that coal is actually a RENEWABLE resource. I object to this madness; this crueLLing of small business with high prices and inconsistent power supply; forcing people to go without reliable power, battling heat and cold extremes, sometimes ending in death which is just murder by proxy for which people need to be accountable. I object. This is unacceptable, and should be a non-starter. What really gets up my nose is that this is already a DONE DEAL – all this is just to PRETEND THAT THERE HAS BEEN SOME SORT OF CONSULTATIVE PROCESS in order to tick Governmental and environmental boxes while they shaft the people. You – Governments, Corporations, Bureaucrats and Individuals – are on notice. When the world turns and realises what you have all done – there WILL be repercussions, and YOU SHOULD CONSIDER YOURSELVES WARNED. At that time, expect to be dealt with in the courts of our land, which themselves have been corrupted, but may very well be cleaned up by then, and which will impose heavy penalties and very long jail sentences for those involved in this corruption. Please think very carefully about going ahead with this theft and corruption. If you continue, and the above eventuates in your lifetime, you will only have yourselves to blame			
SE-86897208	Australia is now being placed in an extremely dangerous position due to the treacherous, RUIN-A-BULL SWINDLE - orchestrated by greedy vested interests & controlling globalists - who are deliberately wrecking our National Security - enabling our biggest enemy to control critical energy infrastructure, destroying our energy security, poisoning our essential soil & water with toxic junk & costing us a motzer for an idiotic, torturously costly, blackout future.	Matters raised regarding national security, global energy policy and geopolitical considerations fall outside the scope of assessment under the EP&A Act. The SSD assessment focuses on the site-specific environmental, social and land-use impacts of the Finley BESS. Those impacts, including contamination and hazard risks, have been assessed through the EIS and supporting technical studies and are subject to mitigation measures. Concerns relating to contamination and safety have been addressed previously in submissions. Where addressed: EIS Section 2 EIS Section 6	General objection to BESS or renewable energy infrastructure	Energy policy; contamination

APPENDIX E

UPDATED BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT



APPENDIX F

UPDATED ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

APPENDIX G

UPDATED TRAFFIC IMPACT ASSESSMENT



APPENDIX H

FLOOD IMPACT ASSESSMENT

APPENDIX I

UPDATED OVERSIZE OVERMASS ROUTE ASSESSMENT



APPENDIX J

PRELIMINARY SITE INVESTIGATION



APPENDIX K

WASTE MANAGEMENT PLAN PRINCIPLES

FINLEY BESS - WASTE MANAGEMENT PLAN PRINCIPLES

Table 14 – Waste management plan principles - Construction phase

MATERIALS ON SITE		TREATMENT/REUSE/RECYCLING		DISPOSAL
Type of Material	Description	Onsite	Offsite	Residual
Excavated material	Excess soil	Stockpile at a suitable location and re-use on site as fill. Stockpiles have suitable temporary erosion and sediment control measures installed.	Any excess to be re-used off-site.	None
Concrete – construction wastes	Surplus pours	Ensure that quantities are correctly estimated prior to pour. Use pre-cast concrete as far as practicable. Crush and use any surplus as fill where possible.	Concrete waste to be separated and collected by concrete recycling contractor.	Dispose any surplus to concrete crushing facility for recycling.
Timber	Packaging from materials delivered	Nil	Recyclable timber to be separated and collected for recycling by recycling contractor.	Any non-recyclable timber.
Metals	Wiring off-cuts, packing straps, steel off-cuts, aluminium off-cuts	Nil	Recyclable metal to be separated and collected for recycling by recycling contractor.	Nil
Plastic/HDPE	Wrap from materials delivered and packaging	Nil	Collection by recycling contractor for recycling	Dispose non-recyclable material to licensed waste disposal facility

MATERIALS ON SITE		TREATMENT/REUSE/RECYCLING		DISPOSAL
Cardboard	Packaging from materials delivered	Nil	Collection by recycling contractor for recycling	Nil
General Waste	Contractors/work force	All waste streams to be separated and recycled	Collection by recycling contractor for recycling	Dispose non-recyclable material to licensed waste disposal facility

Table 15 - Waste management plan principles - Operational phase

TYPE OF WASTE TO BE GENERATED	PROPOSED ON SITE STORAGE AND TREATMENT FACILITIES	DESTINATION
Cardboard packaging / Office paper	Paper and Cardboard to be separated for recycling at source. Paper and Cardboard to be reused where possible, or compacted for recycling.	Recycling contractor for recycling.
Plastic packaging	Bale up on-site. Storage in waste storage and recycling area(s).	Recycling contractor for recycling. Non-recyclable plastics to be disposed as general waste.
Pallets from spare parts	Stored on-site in designated areas suitably screened from public areas.	Supplier for reuse.
Waste/reject product	Storage in waste storage and recycling area(s) or in racks.	Returned to supplier.
Recyclable glass, aluminium, metal, and plastic containers	To be separated at source as far as practicable for recycling by recycling contractor.	Recycling contractor for recycling.
Used Toner Cartridges	To be stored on site for collection by toner supplier.	Toner supplier for recycling.
General waste	To be stored in designated bin(s) screened from public areas	Disposed by licenced waste contractor to licenced waste disposal facility

TYPE OF WASTE TO BE GENERATED	PROPOSED ON SITE STORAGE AND TREATMENT FACILITIES	DESTINATION
Waste storage and recycling receptacles to be located nearby all generation sources. Waste storage and recycling bins to be clearly labelled. The site manager or representative would be responsible for maintaining the waste storage and recycling area, for ensuring bins are emptied and collected as required, and for ensuring that no contamination of waste streams is occurring.		

Table 16 - Waste management plan principles - Decommissioning phase

TYPE OF WASTE TO BE GENERATED	PROPOSED ON SITE STORAGE AND TREATMENT FACILITIES	DESTINATION
Batteries	The inverter, transformer and batteries will be removed from the site via a crane onto a semitrailer for e-waste dismantling, recycling, scrapping and safe disposal at an appropriate waste disposal facility. If possible, the transformer can be reconditioned and refurbished for additional service life at another site.	The approach to batteries would be identify opportunities for recycling. A number of opportunities for battery recycling are currently emerging (including the Reclaim PV facility in SA) and it is expected that by the end of life of the BESS that other options will have been developed (noting the significant amount of facilities currently in delivery with similar lifespans as the development site).
Concrete foundations	The concrete foundations of the inverter, transformer will be excavated and the concrete recycled.	Either recycled/reused off site or disposal to a suitable waste facility.
Recyclable glass, aluminium, metal, and plastic containers	To be separated at source as far as practicable for recycling by recycling contractor,	Recycling contractor for recycling.
General waste	To be stored in designated bin(s) screened from public areas and secured from wildlife.	Disposed by licenced waste contractor to licenced waste disposal facility.
Waste storage and recycling receptacles to be located nearby all generation sources. Waste storage and recycling bins to be clearly labelled. The site manager or representative would be responsible for maintaining the waste storage and recycling area, for ensuring bins are emptied and collected as required, and for ensuring that no contamination of waste streams is occurring.		

