Report

EPS-ENV-RPT-002

Eraring Power Station
MP 07_0084 Operation Compliance Report

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Contents

Definitions / Acronyms

Table 1 Definitions

Term / Acronym	Definition
CEMP	Construction Environmental Management Plan
CCC	Community Consultative Committee
Council	Lake Macquarie City Council
CCP	Coal combustion product
DA	Development Approval
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure
EA	Environmental Assessment – *Upgrade and Expansion of the Coal Combustion Management System, Eraring Power Station*, dated November 2007, and prepared by HLA – ENSR (HLA-ENSR) as amended by: • *Upgrade and Expansion of the CCP Management System, Eraring Power Station – Submissions Report*, dated 15 February 2008, and prepared by HLA – ENSR (HLA-ENSR, 2008) • Modification application (MOD 1) – *Ash Dam Augmentation Project Environmental Assessment*, dated 15 August 2018, prepared by AECOM and *Origin Eraring Power Station – Ash Dam Expansion MOD 1 – Response to Submissions* dated 3 December 2018, prepared by AECOM (AECOM, 2018); and • *Modification Report – Ash Recycling Facilities, Eraring Power Station,* dated 20 August 2021, prepared by AECOM and *Response to Submission Report – Ash Recycling Facilities, Eraring Power Station,* dated 19 November 2021, prepared by AECOM and additional information provided by the Applicant to support the modification application and included in Appendix A of the Departments assessment report on Modification 2 (AECOM, 2021a).
EPA	NSW Environmental Protection Authority
EP&A Act	*Environmental Planning and Assessment Act 1979* (NSW)
EPBC	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
EPL	Environmental Protection Licence
EPS	Eraring Power Station
ERAD	Eraring Ash Dam
FFMP	Flora and Fauna Management Plan
GWMP	Groundwater Management Plan
ISO	International Standards Organisation
Reportable Incident	A set of circumstances that causes or threatens to cause material harm to the environment, and/or breaches or exceeds the limits of performance measures/criteria in this approval
KPI	Key Performance Indicators

Term / Acronym	Definition
LGA	Local Government Area
LMCC	Lake Macquarie City Council
M1	Pacific Motorway
MP	Major Project
Material Harm	Is harm that: • Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or a) Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (such loss includes the reasonable costs and expense that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good to harm to the environment).
MOD 1	CCP storage facility expansion associated with MOD 1 to the west of the CCP storage facility
MOD 2	Increase in ash recycling activities, including construction and use of new ash storage silos on-site
OEMP	Operation Environmental Management Plan
OTMP	Operational Transport Management Plan
Origin	Origin Energy
PA MP07_0084	Project Approval MP07_0084 (as modified)
PCT	Plant Community Type
PIRMP	Pollution Incident Response Management Plan
Planning Secretary	The Secretary under the Act, or nominee
POEO Act	*Protection of the Environment Operations Act 1997* (NSW)
TfNSW	Transport for NSW
tpa	Tonnes per annum

1. Purpose

In accordance with Conditions 5.5 – 5.8 of Project Approval (PA) MP07_0084 (the Approval), Origin Energy Pty Ltd (Origin) is required to complete compliance reports in accordance with the Compliance Reporting Requirements outline in the *Compliance Reporting Post Approval Requirements (2020)* or its latest version.

The purpose of this operation compliance reporting is to monitor and report on the compliance status of the Approval. This report covers the period of 10 March 2024 to 9 March 2025.

1.1 Background

Origin owns and operates Eraring Power Station (EPS) on Rocky Point Road within the Lake Macquarie local government area (LGA). Ash generated at EPS is either deposited onsite within the Eraring Ash Dam (ERAD) or recycled offsite (e.g. as a construction material resource). On the 29 April 2008 PA 07_0084 was approved for the upgrade and expansion of the Coal Combustion Product (CCP) management system at Eraring Power Station (EPS).

Modification 1 (MOD 1) to the Approval was granted on 23 December 2019 for the increase in storage capacity at the EPS Ash Dam. At the time of this compliance report, activities under the MOD 1 project (ash dam expansion) have not commenced construction.

Origin's ash recycling activities at EPS are undertaken in accordance with the Approval. On 21 June 2022, Origin received approval to Modification 2 of the approval to increase the ash recycling capacity at EPS.

The MOD 2 project involves an increase in truck movements accessing and egressing the EPS site to transport ash to a range of end user destinations. On 9 March 2023, Origin notified the Department of Planning, Housing and Infrastructure (DPHI) (formerly the Department of Planning and Environment (DPE)) that commencement of physical development under Modification 2 (MOD 2) would occur on 10 March 2023, with operational works including transport of ash from the following operational elements of the Eraring Power Station site:

- Coal Combustion Product (CCP) Plant; and
- Daracon ash recycling facilities

On 2 November 2023, Origin notified DPHI that construction under MOD 2 would commence in modification area 1 on 13 November 2023. The project currently remains in the construction phase of development. The project is expected to commence operations in April 2025 pending commissioning.

2. Scope

The following conditions of consent from PA 07_0084 outline the compliance reporting requirements for MOD 2:

- Condition 5.5 – Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020) or its latest version.
- Condition 5.6 – Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020) or its latest version, unless otherwise agreed to by the Planning Secretary.
- Condition 5.7 – The Applicant must make each Compliance Report publicly available within 60 days of submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary
- Condition 5.8 – Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020) or its latest version, the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.

In accordance with Table 1 of *the Compliance Reporting Post Approval Requirements (2020)* guidelines, an operational compliance report will be completed on an annual basis from the date of commencement of operations.

This report covers the period of 10 March 2024 to 9 March 2025.

3. Introduction

3.1 Project Description

The EPS site is located on Rocky Point Road, Eraring, about 40 km southwest of Newcastle in the Lake Macquarie LGA. The entire EPS site comprises approximately 1200 ha of land owned by Origin, with the power station itself located on approximately 150 ha and the ERAD occupying approximately 250 ha. The remainder of the land is largely undeveloped consisting of open grassland, canals and bushland (refer to Figure 1).

Operations at EPS are separated from surrounding land uses by extensive land holdings. Existing development in the vicinity of the Site includes the West Wallsend, Newstan, Myuna and Mandalong Collieries, as well as the Vales Point Power Station. The Sydney to Newcastle Railway Line is located west of the EPS and further west the Pacific Motorway (M1) also runs parallel to the Site.

There is a mix of vegetated buffer lands and cleared agricultural land for grazing purposes west of the EPS, and Lake Macquarie lies to the east. The closest residential area is situated in Border Street in the suburb of Eraring approximately 1 km south of the power station itself.

3.2 MOD 2 Project Description

To increase ash recycling rates at EPS, the MOD 2 project involves the following key elements:

- Integration of works currently authorised under local development consent DA/1937/2014/D (existing Daracon operations) into PA MP07_0084, and upgrades to those works to increase throughput capacity to 300,000 tonnes per annum (tpa), including construction of three additional 450t ash storage silos
- Construction of up to four additional 600t ash storage silos to provide additional ash storage capacity and enable export of up to 150,000 tpa of stored ash product.
- Other supporting infrastructure including internal road, weighbridge, crib room, amenities, water tank and pneumatic fly ash pipeline.

There are existing ash recycling activities undertaken on the EPS site that are not covered under the MOD 2 project. This includes the Boral Bottom Ash Reclamation Area which is part of the existing EPS operations and the Flyash Australia facility which operates under a separate local Development Consent (DA/684/2009) issued by Lake Macquarie City Council (LMCC) (Figure 2).

3.2.1 MOD 2 Project Staging

On 9 March 2023, Origin notified the DPHI (formerly the Department of Planning and Environment) that commencement of physical development under MOD 2 would occur on 10 March 2023, with operational works including transport of ash from the following operational elements of the EPS site:

- Coal Combustion Product (CCP) Plant; and
- Daracon ash recycling facilities

On 2 November 2023, Origin notified DPHI that construction under MOD 2 would commence in modification area 1 on 13 November 2023. The project currently remains in the construction phase of development.

On 15 May 2023, Origin submitted the first OCR which covered the period from approval of MOD 2 on 21 June 2022 up to the commencement of operations on under MOD 2 on 10 March 2023.

At this point in time, construction in modification area 2 is not planned to commence construction. Any changes to the construction timeline in this area will be notified to the DPHI in accordance with Condition 5.9 of the Approval.

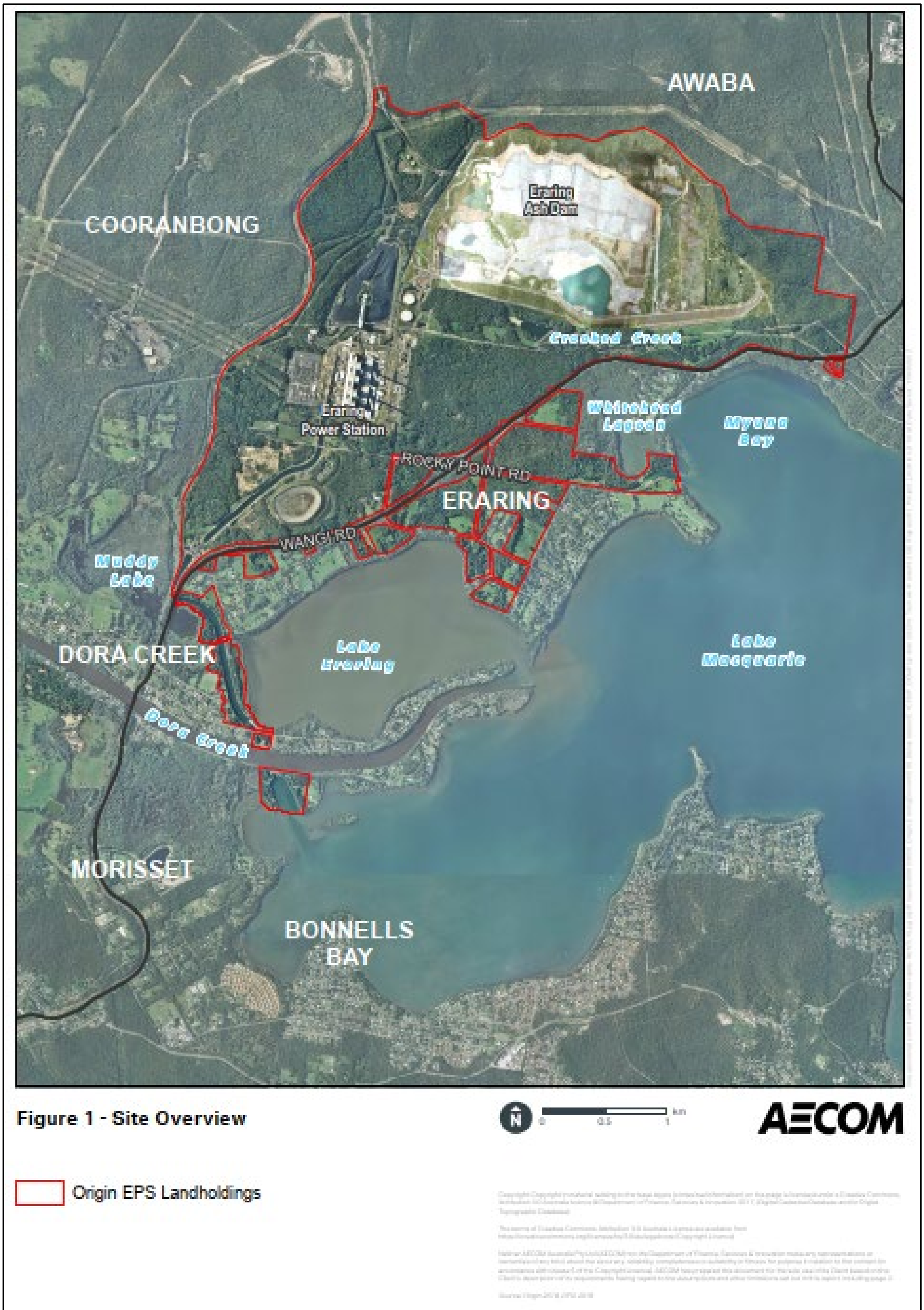

Figure 1 - Site Overview

Figure 2 - Existing Ash Recycling Facilities

4. Environmental Management and Responsibilities

4.1 Roles and Responsibilities

The Origin Head of Ash Strategy is responsible for coordinating ash recycling activities at EPS including those associated with MOD 2. Roles and environmental responsibilities for environmental/compliance management of the project are summarised below in Table 2.

Table 2 Roles and Responsibilities

Role	Environmental responsibility
Origin Head of Ash Strategy Brett Murphy – Brett.Murphy@originenergy.com.au	• Ensure implementation of the OEMP for MOD 2 • Monitor conformance with requirements of the OEMP • Investigate complaints and incidents as it relates to haulage operations under MOD 2 and where necessary identify correct actions to prevent a reoccurrence. • Review non-conformances with contract owners as required. • Implement corrective actions and address the recommendations of site audits and incident investigations. • Liaise with external stakeholders and community as required.
Advisor - Environment Peter Waddingham Peter.Waddingham@originenergy.com.au	• Assist in the implementation of the OEMP and conformance with requirements. • Track and report on environmental performance against the management actions specified in this OEMP, the Environmental Protection Licence (EPL) and relevant project approval conditions. • Maintain complaints and incident register. • Implement corrective actions and address the recommendations of site audits and incident investigations. • Liaise with external stakeholders and community as required.
Origin EPS Staff	• Undertake General Awareness Training and other relevant training as required. • Operate equipment in a safe and environmentally responsible manner.

Role	Environmental responsibility
	• Maintain site cleanliness and housekeeping. • Report to supervisor any environmental issues identified. • Respond to an environmental emergency in accordance with the Emergency Response Plan and Pollution Incident Response Management Plan.
Contractors	• Undertake General Awareness Training and other relevant training as required. • Operate equipment in a safe and environmentally responsible manner. • Maintain site cleanliness and housekeeping. • Report to supervisor any environmental issues identified. • Respond to an environmental emergency in accordance with the Emergency Response Plan and Pollution Incident Response Management Plan.
Haulage Operators	• Undertake Ash Recycle Drivers Familiarisation Induction and other relevant training as required. • Operate equipment in a safe and environmentally responsible manner. • Maintain site cleanliness and housekeeping. • Report to supervisor any environmental issues identified.

5. Previous Actions

At the date of this Operation Compliance Report, there is no previous actions from an Independent Audit or compliance report.

6. Compliance Status

In accordance with the *Compliance Reporting Post Approval Requirements (2020)* the status of each compliance requirement applicable during the reporting period has been recorded using the relevant descriptors in Table 3 below.

Table 3 Compliance Status Descriptors

Status	Description
Compliant	The proponent has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with.
Non-compliant	The proponent has identified a non-compliance with one or more elements of the requirement.
Not triggered	A requirement has an activation or timing trigger that has not met at the phase of the development when the compliance assessment is undertaken, therefore an assessment of compliance is not relevant.

Table 4 below outlines the compliance status of all conditions of consent in PA 07_0084.

Table 4 Compliance Status

Condition Number	Compliance Requirements	Development phase	Comments	Status
1.2	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	All	Noted	Compliant
1.3	Consistent with the requirements of this approval, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this approval, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition 1.3(a).	All	Origin complied with all written directions of the Secretary during the audit period, specifically in relation to the preparation and approval of the Construction Environmental Management Plan	Compliant
1.4	Deleted	N/A	N/A	N/A
1.5	The Applicant must operate a CCC for the Project to the satisfaction of the Planning Secretary. This CCC must be operated in general accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects January 2019 during the life of the Project. This CCC must be operating within three months from the	MOD 1	CCC is currently operational with quarterly meetings held as required. Meeting minutes are available at the following link: https://www.originenergy.com.au/about/who-we-are/what-we-do/generation/eraring-documents-resources/ Meetings have been held since 14 May 2020 DPE approved CCC members 24 April 2020	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	date of approval of MOD 1, or other timeframe agreed by the Planning Secretary. Notes: • The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this approval. • In accordance with the guideline, the Committee should be comprised of an independent chair and appropriate representation from the Applicant, Council, recognised environmental groups and the local community.			
1.6	The Applicant shall pay Council annual contributions for the maintenance of roads along the haulage routes in accordance with the terms specified in Appendix B.	All	2024 contributions paid to Council on 30 August 2024	Compliant
2.1	The Applicant shall provide a compensatory habitat package consisting of no fewer than two hectares of compensatory habitat for each hectare of terrestrial vegetation removed as part of the project. Specifications for the compensatory habitat, including location, composition, quality and management of the habitat, shall be determined in consultation with the BCS. The package must include: (a) a schedule of vegetation clearing, indicating stages and timing and compensatory habitat area(s) corresponding to each stage of clearing;	MOD 1	Not triggered during the reporting period. The MOD 1 project has not commenced. The original compensatory package work was undertaken in 2008 for the CCP approval	Not Triggered

Condition Number	Compliance Requirements	Development phase	Comments	Status
	(b) demonstration of consistency with the 'Offsetting Principles' contained in the draft Lower Hunter Regional Conservation Plan (2006); (c) demonstration of potential coordination, connection and interaction with compensatory habitat provided in pursuance of the requirements of project approval for the Eraring Power Station Upgrade and Attemperation Reservoir; (d) demonstration of the potential for off-set areas to connect with and complement other areas of conservation value, particularly with respect to habitat corridors and connectivity; (e) details of proposed legal mechanisms to secure the protection of offsets in perpetuity; and (f) maintenance, monitoring and auditing program of the compensatory habitat areas			
1.7	The program of funding or works associated with the compensatory habitat package shall be submitted for the approval of the Planning Secretary prior to the commencement of vegetation clearing, and/or each stage of clearing. Note: This compensatory habitat package does not apply to clearing undertaken for MOD1, with additional offset requirements outlined in Condition 2.1A.	MOD 1	Not triggered during the reporting period. The MOD 1 project has not commenced. The original compensatory package work was undertaken in 2008 for the CCP approval	Not Triggered
2.2	Within 12 months of commencing construction of MOD1 under this approval, or other	MOD 1	Not triggered during the reporting period.	Not Triggered

Condition Number	Compliance Requirements	Development phase	Comments	Status
	timeframe agreed by the Planning Secretary, the Applicant shall retire the biodiversity credits specified in Table 1 to offset the biodiversity impacts of MOD1. The retirement of credits shall be carried out in consultation with BCS and in accordance with the Biodiversity Offsets Scheme of the BC Act, to the satisfaction of the BCT.		The MOD 1 project has not commenced.	
2.3	Deleted	N/A	N/A	N/A
2.4	The Applicant shall only undertake construction activities associated with the project that would generate an audible noise at any residential premises during the following hours: (a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; (b) 8:00 am to 1:00 pm on Saturdays; and (c) at no time on Sundays or public holidays. This condition does not apply in the event of a direction from police or other relevant authority for safety reasons.	All	No construction activities have taken place that would generate an audible noise at residential premises outside of standard construction hours during the reporting period	Compliant
2.5	The hours of construction activities specified under condition 2.4 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction specified under condition 2.4 shall be: a) considered on a case-by-case basis;	All	No requests for variation of construction hours have been submitted during the reporting period	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	b) accompanied by details of the nature and need for activities to be conducted during the varied construction hours; and c) accompanied by written evidence of the EPA's agreement with the proposed variation in construction times, after providing any information necessary for the EPA to reasonably determine that activities undertaken during the varied construction hours will not adversely impact on the acoustic amenity of receptors in the vicinity of the site.			
2.6	Except as may be expressly provided by an Environment Protection Licence (EPL) for the project, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.	All	No non-compliances have occurred under Section 120 of the POEO Act during the reporting period	Compliant
2.7	Soil and water management controls shall be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities, in accordance with Landcom's Managing Urban Stormwater: Soils and Construction.	All	CEMP for MOD 2 states that Construction of Stage 1 will be undertaken in accordance with Managing Urban Stormwater: Soils and Construction Vol. 1 (Landcom 2004). Viewed Appendix A – Erosion and Sediment Control Plan. Weekly, pre- and post- rainfall inspections of the MOD 2 project are undertaken in accordance with the CEMP	Compliant
2.8	The Applicant shall design and construct the CCP storage facility expansion in a manner that minimises the interception of underlying groundwater.	CCP	Groundwater Management Plan was prepared for the construction of the CCP in 2009 DPE approved the GMP on 2 August 2009	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
2.9	The Applicant shall construct the project in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust. All activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, the Applicant shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.	All	No community complaints Weekly construction inspections target air quality No non-compliance relating to air quality during the audit period	Compliant
2.10	The Applicant shall not permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997, to be emitted beyond the boundary of the site.	All	No non-compliances relating to odour have occurred during the reporting period No odour related complaints have been received during the reporting period.	Compliant
2.11	The Applicant shall beneficially reuse all non-contaminated spoil generated during the construction of the project on the site, or off-site should an appropriate off-site reuse location exist.	All	Spoil produced during the MOD 2 construction phase was reused to maintain unsealed roads during the reporting period	Compliant
2.12	All wastes, and spoil unable to be reused in accordance with condition 2.11, shall be directed to a waste management facility lawfully permitted to accept those materials.	All	Waste is managed on site by a waste contractor. MOD 2 construction waste was managed through the standard EPS operational waste streams and disposed of at Cardiff Waste Transfer Station and Buttonderry Waste Management Centre	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
2.13	The Applicant shall ensure that all wastes generated as a consequence of the project are assessed and classified in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version).	All	All waste on site is managed in accordance with the Waste Classification Guidelines (NSW EPA 2014), in accordance with the condition and the approved CEMP for the MOD 2 project	Compliant
2.14	Except as expressly permitted in an appropriate licence, waste shall not be received at the premises for storage, treatment, processing, reprocessing or disposal.	All	No waste was received at the premises for storage, treatment, processing, reprocessing or disposal during the reporting period	Compliant
2.15	If during the course of construction, the Applicant becomes aware of any previously unidentified Aboriginal object(s), all work likely to affect the object(s) must cease immediately and the Applicant must contact the Heritage NSW - ACH to determine an appropriate course of action prior to the re-commencement of work in the vicinity of the object(s).	All	No previously unidentified Aboriginal objects were found during the course of construction during the reporting period Construction activities in the MOD 2 area were undertaken in accordance with the project's Aboriginal Heritage Management Plan	Compliant
2.16	Chemicals and grease stored in bulk form, or work areas where spillages are likely to occur, must be bunded in accordance with: a) the requirements of all relevant Australian Standards; and b) the EPA's Storing and Handling of Liquids; Environmental Protection - Participants Manual	All	Regular inspections completed to ensure chemical, and greases are bunded in accordance with requirements	Compliant
3.1	Within three months of commissioning of the fly ash conditioning plant, the Applicant must conduct a noise assessment of the plant while operating under full load conditions. The	CCP	Commissioning of the fly ash conditioning plant was undertaken in 2010, outside of the reporting period	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	assessment shall meet the requirements of the EPA, and shall include, but not necessarily be limited to: (a) noise assessment and monitoring, consistent with the guidelines provided in NSW Industrial Noise Policy (EPA, 2000); (a) methodologies for noise monitoring; (b) location of noise monitoring; (c) frequency of noise monitoring; (d) identification of monitoring sites at which pre- and post-project noise levels can be ascertained; and (e) details of any complaints relating to noise impacts. A report providing the results of the assessment shall be submitted to the Planning Secretary and the EPA within 28 days of completion of the testing required under a).			
3.2	Prior to the commencement of the operation of the project, the Proponent shall undertake a review of the existing groundwater monitoring regime, which shall include but not necessarily be limited to: a) survey of existing monitoring bores; b) parameters and pollutants to be monitored, including procedures and protocols for sampling and testing; c) review of the adequacy of existing groundwater monitoring network at the Eraring Power Station to determine	All	See response to Schedule 2, Condition 2.8 above for response to Groundwater Management Plan A revision of the GMP has commenced in the reporting period but has not been submitted to the Department for review	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	whether current contaminant levels at receiving waters originate from existing activities associated with the power station, including the existing CCP storage facility; d) installation of any additional monitoring bore(s), both up and down gradient of the CCP storage facility; e) details of groundwater quality limits that would indicate impacts from the CCP storage facility, particularly as a result of seepage, and a contingency response plan in the events that impacts are identified; and f) provisions for periodic auditing and reporting of results to the Planning Secretary. The Proponent shall revise its groundwater monitoring regime, as necessary, and update its existing Groundwater Management Plan in accordance with the groundwater monitoring review. A copy of the updated Plan shall be submitted to the Planning Secretary for approval prior to its implementation.			
4.1	The Proponent shall prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during construction of the project. The Plan shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR,	MOD 2	CEMP for the MOD 2 project was approved by the Department on 30 October 2023. The CEMP has been implemented throughout the reporting period.	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	2004) and shall include, but not necessarily be limited to: a) a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant; b) statutory and other obligations that the Proponent is required to fulfil during construction including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies; c) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: i. measures to monitor and manage dust emissions; ii. measures to monitor and minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities; iii. measures to monitor and control noise emissions during construction works			

Condition Number	Compliance Requirements	Development phase	Comments	Status
	d) a description of the roles and responsibilities for all relevant employees involved in the construction of the project; e) the additional studies listed under condition 4.2 of this approval; and f) complaints handling procedures during construction. The Plan shall be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed by the Planning Secretary. Construction works shall not commence until written approval has been received from the Planning Secretary.			
4.2	As part of the Construction Environmental Management Plan for the project, required under condition 4.1 of this approval, the Applicant shall prepare and implement the following: (a) a Flora and Fauna Management Plan to outline measures to protect and minimise loss of native vegetation and native fauna habitat. The Plan must include, but not necessarily be limited to: (i) plans showing terrestrial vegetation communities; important flora and fauna habitat areas; locations where threatened species, populations or ecological communities were recorded; and areas to be cleared. The plans must also identify vegetation adjoining the Site	MOD 2	CEMP for the MOD 2 project was approved by the Department on 30 October 2023. The approved CEMP includes all required sub-plans as per the conditions The CEMP has been implemented throughout the reporting period.	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	where this contains important habitat areas and/or threatened species, populations or ecological communities; (ii) details of the timing of clearing to ensure that it does not adversely affect critical periods in the lifecycles of significant species; (iii) methods to manage impacts on flora and fauna species (terrestrial and aquatic) and their habitat which may be directly or indirectly affected by the project; (iv) flora and fauna monitoring programs to be implemented during both construction and operation; and (v) a Vegetation Clearance Protocol. (b) a Traffic Management Plan to outline management of traffic conflicts that may be generated during construction of the project. The Plan must be prepared in consultation with Council and TfNSW and must include, but not necessarily be limited to: (i) details of traffic routes for heavy vehicles, including any necessary route or timing restriction for oversized loads; (ii) detailed consideration of measures to be employed to ensure traffic volume, acoustic and amenity impacts along the heavy vehicle routes are minimised; (iii) detailed consideration of alternative routes (where necessary);			

Condition Number	Compliance Requirements	Development phase	Comments	Status
	(iv) provisions for the management of disruptions to traffic, particularly on Wangi Road; and (v) demonstration that all statutory responsibilities with regard to road traffic impacts have been complied with. (c) a Construction Noise Management Plan to detail how construction noise and vibration impacts would be minimised and managed, including, but not necessarily be limited to: (i) details of construction activities and a schedule for construction works; (ii) identification of construction activities that have the potential to generate noise and/ or vibration impacts on surrounding land uses, particularly residential areas; (iii) a detailed description of what actions and measures would be implemented to ensure that these works would comply with the relevant noise and vibration criteria/ guidelines; (iv) procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity, as well as procedures for dealing with and responding to noise complaints; and (v) a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be			

Condition Number	Compliance Requirements	Development phase	Comments	Status
	undertaken and how the results of this monitoring would be recorded. (d) an Erosion and Sedimentation Management Plan to detail measures to minimise erosion and discharge of sediment and other pollutants to land and/or water during site preparation and construction works. The Plan must include, but not necessarily be limited to: (i) identification of the construction activities that could cause soil erosion or discharge sediment or water pollutants from the site; (ii) description of the management methods to minimise soil erosion or discharge of sediment or water pollutants from the site, including a strategy to minimise the area of bare surfaces during construction; (iii) demonstration that proposed erosion and sediment control measures will conform with, or exceed, the relevant requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004); (iv) details of an erosion monitoring program during construction of the project, including measures to address erosion, should it occur, and to rehabilitate/ stabilise disturbed areas of the Site. (e) an Aboriginal Heritage Management Plan to detail outcomes of consultation with the Aboriginal stakeholders and the measures that			

Condition Number	Compliance Requirements	Development phase	Comments	Status
	will be implemented to identify, protect, monitor and/or manage Aboriginal heritage sites. The Plan must include, but not necessarily be limited to: (i) the outcome of consultation with the Aboriginal stakeholders, including a site visit(s) to identify any heritage items; (ii) managing the discovery of any human remains; (iii) maintaining and managing reasonable access for Aboriginal stakeholders to heritage items on site; and (iv) ongoing consultation with the Aboriginal stakeholders.			
4.3	The Proponent shall prepare and implement an Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during operation of the project. The Plan shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004) and shall include, but not necessarily be limited to: a) identification of all statutory and other obligations that the Proponent is required to fulfil in relation to operation of the project, including all approvals, licences, approvals and consultations; b) a description of the roles and responsibilities for all relevant employees involved in the operation of the project;	Operation	8 February 2023 – OEMP approved by the DPE. As per Table 2 in the approved OEMP, condition f is not applicable to this OEMP and operations under MOD 2. OEMP has been implemented throughout the reporting period	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	c) overall environmental policies and principles to be applied to the operation of the project; d) standards and performance measures to be applied to the project, and a means by which environmental performance can be periodically reviewed and improved, where appropriate; e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this approval; f) preparation of a Coal Combustion Product Management Plan to outline the CCP storage facility and associated infrastructure will be managed to minimise potential impacts on the surrounding environment. The Plan shall include…			
4.4	The Applicant may satisfy condition 4.3 of this approval by demonstrating to the satisfaction of the Planning Secretary that existing, equivalent documentation has been appropriately updated to reflect the CCP storage facility expansion.	All	Not triggered as OEMP has been developed for MOD 2 operations	Not Triggered
4.5	The Applicant shall comply with the performance measures in Table 2 during the operation of the CCP storage facility expansion.	MOD 1	Not triggered during the reporting period. The MOD 1 project has not commenced.	Not Triggered
.4.6	Prior to carrying out any mine void remediation activities associated with the MOD 1 CCP storage facility expansion, the Proponent must	MOD 1	Not triggered during the reporting period. The MOD 1 project has not commenced.	Not Triggered

Condition Number	Compliance Requirements	Development phase	Comments	Status
	prepare a Mine Void Remediation Plan. The Mine Void Remediation Plan must be prepared in consultation with the EPA, DPIE Water, Dam Safety Committee, Centennial Coal and SA NSW, and to the satisfaction of the Planning Secretary. This plan must…			
4.7	By the end of October each year, or other timeframe agreed by the Planning Secretary, a report shall be submitted to the Department to demonstrate annual progress of mine void remediation, to the satisfaction of the Planning Secretary.	MOD 1	Not triggered during the reporting period. The MOD 1 project has not commenced.	Not Triggered
4.8	The Proponent must prepare an Air Quality Management Plan to the satisfaction of the Planning Secretary. This plan must: a) be prepared by a suitably qualified and experienced person/s; b) be prepared in consultation with the EPA; c) be submitted to the Planning Secretary for approval within 3 months of approval of MOD 1 or other timeframe agreed by the Planning Secretary; d) describe the air quality management system in detail; and e) describe the measures to be implemented to ensure: i. compliance with the air quality operating conditions of this approval; and	MOD 1	Air Quality Management Plan (AQMP) dated 27 May 2022 is currently approved and available on project website.	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	ii. the air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events; f) include an air quality monitoring program, undertaken in accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007), that: i. uses monitors to evaluate the performance of the project to guide day to day operations; ii. adequately supports the air quality management system; and; iii. includes a protocol for identifying any air quality-related incident or non-compliance and for notifying the Department and relevant stakeholders of these events. The Proponent must implement the approved Air Quality Management Plan.			
4.9	The Applicant must prepare a Rehabilitation Management Plan for all land disturbed by the project to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s; (b) be prepared in consultation with the Department and Council;	MOD 1	Rehabilitation Management Plan was submitted to the Department for review on 18 January 2024 following several extensions. Rehabilitation Management Plan was approved by the Department on the 29 November 2024.	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	(c) be submitted to the Secretary for approval within 3 years of approval of Modification 1 or other timeframe agreed by the Planning Secretary; (d) be consistent with the Long-Term Ash Management Strategy required under section 4A of this approval; (e) include detailed performance indicators and completion criteria for each rehabilitation domain, and triggers for remedial actions; (f) describe the measures to be implemented on the site to achieve the criteria in paragraph e); (g) include a program to monitor, independently audit and report on progress against the criteria in paragraph e) and the effectiveness of the measures in paragraph f); and (h) describe any further studies, work, research or consultation that will be undertaken to expand the site-specific rehabilitation knowledge base, reduce uncertainty and improve rehabilitation outcomes. The Applicant must implement the approved Rehabilitation Management Plan.			
4.10	The Applicant must prepare an Operational Traffic Management Plan to the satisfaction of the Planning Secretary prior to commencing	Operation	21 July 2022 – Origin letter to the Department seeking endorsement of suitably qualified and experience persons for development of	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	road haulage associated with MOD 2. The Plan must: a) be prepared by suitably qualified and experienced person/s b) be prepared in consultation with the TfNSW and Council; c) include the details of traffic routes for heavy vehicles, including any necessary routes or timing restrictions for heavy or oversized loads associated in particular with bridge updates on Wilton Road; d) include detailed measures to minimise impacts on traffic performance, road safety and noise amenity along the heavy vehicle routes, including specific measures to minimise traffic volumes: i. through the Morisset town centre (Dora Street) between 4pm and 6pm; ii. during the night time period 10pm and 7am; e) include detailed measures to manage potential cumulative traffic impacts, including other projects undertaken at Eraring Power Station f) include processes to demonstrate compliance with statutory requirements for road traffic impacts g) include a Driver Code of Conduct including:		Operational Traffic Management Plan (OTMP). 25 July 2022 – Letter from the Department endorsing plan development team. 28 November 2022 – OTMP submitted to the Department for review and approval. 22 December 2022 – OTMP approved by the Department. 17 January 2024 – OTMP revised to consider MOD 2 construction and resubmitted to the Department. 6 February 2024 – revised OTMP approved by the Department. OTMP implemented throughout the reporting period	

Condition Number	Compliance Requirements	Development phase	Comments	Status
	i. initiatives for haulage through residential areas and/or school zones ii. an induction process for vehicle operators and regular toolbox meetings including education regarding access routes and measures to avoid platooning; iii. a public complaint management and disciplinary procedure; and iv. protocols for noise minimisation The Applicant must implement the approved Operational Traffic Management Plan.			
4A.1	The Applicant shall prepare and implement a Long-Term Ash Management Strategy for the site, to the satisfaction of the Planning Secretary. The Strategy shall be developed in consultation with the EPA and Council, and shall include, but not necessarily be limited to: a) a mandatory goal of 80% reuse or recycling of ash from the Eraring Power Station by 31 December 2021. This goal may only be altered with the prior written agreement of the Planning Secretary, based on a demonstration by the Applicant that market conditions reasonably preclude this goal being achieved; b) a program for the investigation of alternative ash management measures over time, with a particular focus on the minimisation of ash disposal on site and beneficial reuse of ash;	All	Long Term Ash Management Strategy submitted to the Department on the 30 September 2024 and approved on 20 January 2025. Year-on-year extensions have been granted by the Department to reach the 80% reuse goal LTAMS reports are available on the project website	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	c) a framework for the identification and assessment of alternative ash management measures from time to time, having regard to the operational needs of the Eraring Power Station, and social, economic and environmental implications of those measures; d) a staging strategy for the implementation of works the subject of this approval; e) a strategic management framework for the optimisation of ash disposal capacity on the site, and periodic review of ash management practices to achieve this outcome; f) an environmental management framework for the on-going management of ash disposal and ash management measures on site, consistent with contemporary best environmental practice; g) a rehabilitation strategy that outlines proposed rehabilitation, with consideration of the ash reuse potential, including a: (i) description of techniques to restore the area; (ii) timetable for the progressive staging of the rehabilitation program; and (iii) monitoring and auditing program; and (h) a strategy for the reconciliation of the generating life of the Eraring Power Station and the availability and management of ash produced by the Power Station.			

Condition Number	Compliance Requirements	Development phase	Comments	Status
	In respect to a), if reuse options are slow to emerge, or they are not feasible on economic, environmental, or industrial reliability criteria, the timeframe goal be may extended with the agreement of the Planning Secretary, in consultation with the EPA. Extension of the goal shall be subject to the Applicant providing to the satisfaction of the Planning Secretary information on available reuse options, justification of why these cannot be – or have not been - adopted, and a description of what measures will be implemented to facilitate the reuse of all ash generated on the premises for a beneficial purpose. After reviewing this information, the Planning Secretary in consultation with the EPA, may approve a modified timeframe goal(s), and may require the Applicant to carry out further investigations or works into reuse of all ash generated on the premises for a beneficial purpose.			
5.1	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the project (including the application number and the name of the project if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix C.	All	No incidents relating to the Approval during the reporting period.	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
5.2	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	All	No non-compliances relating to the Approval during the reporting period.	Compliant
5.3	A non-compliance notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.			
5.4	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.			
5.5	The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this project approval. The Program shall include, but not necessarily limited to:	All	This report. An annual compliance report will be completed during operations from the date of this report. All compliance reports will be made available on the project website	Compliant
5.6	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020) or its latest version, unless otherwise agreed to by the Planning Secretary.			
5.7	The Applicant must make each Compliance Report publicly available within 60 days of submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary.			

Condition Number	Compliance Requirements	Development phase	Comments	Status
5.8	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020) or its latest version, the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.			
5.9	Prior to the commencement of the construction, operations, upgrading or decommissioning of the project or the cessation of operations, the Applicant must notify the Department via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.	All	5 August 2022 – Origin submitted letter to the Department notifying in accordance with Condition 5.9 and 5.10 that development under MOD 2 is planned to be staged and no construction phased planned for the development. Origin requested that no Construction Environment Management Plan be developed for the Project. 5 September 2022 – letter from the Department received acknowledging the staging and timing of management plans, including approval 20 February 2023 – Origin submitted letter to the Department notifying of the commencement of operations. Department letter dated 16 March 2023 acknowledging commencement of operations and confirming ongoing reporting requirements. Notification letter to DPE dated 2 November 2023 stating that construction under	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
			modification 2 is planned to commence on 13 November 2023. Email receipt dated 3 November stating that the notification has been submitted through the Major Projects portal.	
5.10	If any of these phases of the project are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identifying the project that would be carried out during the relevant stage.	All	5 August 2022 – Origin submitted letter to the Department notifying in accordance with Condition 5.9 and 5.10 that development under MOD 2 is planned to be staged and no construction phased planned for the development. Origin requested that no Construction Environment Management Plan be developed for the Project. 5 September 2022 – letter from the Department received acknowledging the staging and timing of management plans, including approval	Compliant
5.11	Within one year of the date of the physical commencement of development under Modification 2, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the project. The Audit must: a) be prepared in accordance with the Independent Audit Post Approval Requirements (NSW Government 2020) and; b) be submitted, to the satisfaction of the Planning Secretary, within two months of	All	Audit inspection (6-7 March 2024) has been undertaken within one year of the date of physical commencement of development under Mod 2 (10 March 2023). Audit has been prepared in accordance with the Independent Audit Post Approval Requirements. Audit Report submitted to the Department by 9 May 2024	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	undertaking the independent audit site inspection, unless otherwise agreed by the Planning Secretary.			
5.12	In accordance with the specific requirements of the Independent Audit Post Approval Requirements (NSW Government 2020), the Applicant must: a) review and respond to each Independent Audit Report prepared under Condition 7 above b) submit a response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations of the Independent Audit Report; c) implement the recommendations to the satisfaction of the Planning Secretary; and d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary.			
5.13	Any condition of this approval that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit.	All	Noted	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
	For the purposes of this condition, as set out in the Act, “monitoring” means monitoring of the project to provide data on compliance with the approval or on the environmental impact of the project, and an “environmental audit” means a periodic or particular documented evaluation of the project to provide information on compliance with the approval or the environmental management or impact of the project.			
5.14	Within 3 months of: a) the submission of an incident report under condition 5.1 above; or b) any modification to the conditions of this approval (unless the conditions require otherwise), c) the submission of an audit report in accordance with condition 5.11 of this approval; or d) a direction of the Secretary under Condition 1 of Schedule 2 The Proponent must review and, if necessary, revise the strategies, plans and programs required under this approval to the satisfaction of the Planning Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Planning Secretary for approval.	All	Conditions (a) – (d) have not been triggered in the audit period	Compliant

Condition Number	Compliance Requirements	Development phase	Comments	Status
5.15	The Proponent must: a) make the following information publicly available on its website as relevant to the stage of the project: • Current statutory approvals for the project; • Approved strategies, plans and programs required under the conditions of this approval; • a comprehensive summary of the monitoring results of the project, which have been reported in accordance with the various strategies, plans and programs approved under the conditions of this approval; • a complaints register, which is to be updated on a monthly basis; • any independent environmental audit, and the Proponent's response to the recommendations in any audit; and • any other matter required by the Secretary; and b) keep this information up to date to the satisfaction of the Planning Secretary.	All	All documents relating to the project approval are contained on the EPS public website in accordance with Condition 5.15.	Compliant

7. Incidents and Complaints

At the date of this Operation Compliance Report, there has been no environmental incidents which relate to the Approval. No complaints relating to the Approval have been received during the reporting period. No non-compliances have been identified during this reporting period.

8. Declaration

Compliance Report Declaration Form	
Project Name	Eraring Power Station PA 07_0084
Project Application Number	07_0084
Description of Project	Staged expansion of the CCP management facility in conjunction with changes in the CCP disposal method from lean phase to dense phase. The project also includes the installation of new infrastructure comprising of CCP collection, storage, conditioning and pumping facilities to allow for storage and transportation of CCP from the power station to the CCP management facility
Project Address	Eraring Power Station, Rocky Point Road, Dora Creek NSW 2264
Proponent	Origin Energy Eraring Pty Limited
Title of Compliance Report	Operation Compliance Report
Date	9 May 2024

I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge:

i. The Compliance Report has been prepared in accordance with all relevant conditions of consent;

ii. The Compliance Report has been prepared in accordance with the Compliance Reporting Requirements;

iii. The findings of the Compliance Report are reported truthfully, accurately and completely;

iv. Due diligence and professional judgement have been exercised in preparing the Compliance Report; and

v. The Compliance Report is an accurate summary of the compliance status of the development.

Name of Authorised Reporting Officer	Brett Murphy
Title	Head of Ash Strategy
Signature	
Company	Origin Energy Eraring Pty Limited
Company Address	Eraring Power Station, Rocky Point Road, Dora Creek NSW 2264

9. Document Control

<table>
<tr><td colspan="6">Author (To Whom any changes are to be recommended)</td></tr>
<tr><td colspan="4">Position</td><td colspan="2">Incumbent</td></tr>
<tr><td colspan="4">Advisor – Environment</td><td colspan="2">Peter Waddingham</td></tr>
<tr><td colspan="6">Stakeholders and other contributors</td></tr>
<tr><td colspan="4">Position</td><td colspan="2">Incumbent</td></tr>
<tr><td colspan="4">Closure Approvals Manager</td><td colspan="2">Mikayla Forwood</td></tr>
<tr><td colspan="6">Reviewed by</td></tr>
<tr><td colspan="3">Position</td><td colspan="2">Incumbent</td><td>Review Date</td></tr>
<tr><td colspan="3">Closure Approvals Manager</td><td colspan="2">Mikayla Forwood</td><td>07/02/2025</td></tr>
<tr><td colspan="3">Advisor – Environment</td><td colspan="2">Peter Waddingham</td><td>07/02/2025</td></tr>
<tr><td colspan="6">Approved By</td></tr>
<tr><td colspan="3">Position</td><td colspan="2">Incumbent</td><td>Approved Date</td></tr>
<tr><td colspan="3">Head of HSE</td><td colspan="2">Gemma Dobson</td><td>21/02/2025</td></tr>
<tr><td colspan="6">History</td></tr>
<tr><td>Date</td><td>Author</td><td>Version</td><td colspan="3">Nature of Change</td></tr>
<tr><td>02/03/2023</td><td>Mikayla Henderson</td><td>1.0</td><td colspan="3">Initial document</td></tr>
<tr><td>11/05/2023</td><td>Mikayla Henderson</td><td>1.1</td><td colspan="3">Minor change: minor wording updates</td></tr>
<tr><td>09/05/2024</td><td>James Epstein</td><td>2.0</td><td colspan="3">Updated Operational Compliance report for current reporting period</td></tr>
<tr><td>06/02/2025</td><td>Peter Waddingham</td><td>3.0</td><td colspan="3">Updated Operational Compliance Report for the current reporting period.</td></tr>
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