



Your ref: SSD-77527735

Our ref: DOC25/984091

Pragya Mathema
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure - NSW Planning Group
Via Major Projects Portal: PAE-99771470

Dear Pragya

Subject: Mangoplah Battery Energy Storage System - SSD-77527735

Thank you for your email dated 18 November 2025 seeking advice from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water about the Environmental Impact Statement (EIS).

We have reviewed the exhibited EIS against the Secretary's Environmental Assessment Requirements (SEARs) issued to the proponent on 27 November 2024.

CPHR considers the EIS does meet the SEARs requirements for flood risk management, contingent on the proponent addressing issues identified in **Attachment A and B**.

CPHR considers that further work is required on the Biodiversity Development Assessment Report (BDAR) to meet the SEARs for biodiversity.

The key issues identified are:

- The BDAR will need to be updated to reflect proposed additional surveys and expert reports for species currently assessed as assumed present, including for one entity at risk of Serious and Irreversible Impacts (SII).
- Mitigation measures require more detail to meet the requirements of the Biodiversity Assessment Method (BAM).

These matters will need to be addressed to ensure the final BDAR complies with the BAM.

All plans required as a Condition of Approval that relate to flood risk management or biodiversity should be developed in consultation with CPHR.

If you have any questions about this advice, please contact Mel Cotterill, Principal Conservation Planning Officer, via planning.southwest@environment.nsw.gov.au or 02 6022 0614.

Yours sincerely

Helen Wardby
16 December 2025
**Acting Director, South West
Regional Delivery
Conservation Programs, Heritage and Regulation Group
NSW Department of Climate Change, Energy, the Environment and Water**

ATTACHMENT A – CPHR Assessment Summary for Mangoplah BESS EIS (SSD-77527735)

ATTACHMENT B – Detailed advice for Mangoplah BESS EIS (SSD-77527735)

ATTACHMENT A CPHR Assessment Summary for Mangoplah BESS EIS (SSD-77527735)

Key Issues

The following issues and recommendation are to be resolved prior to determination unless otherwise specified.

Flood Risk Management

- 1.1. During the detailed design, update the flood impact assessment once upgrade requirements for the site access roads are determined.
- 1.2. During the detailed design, confirm that flood risks are within acceptable limits.
- 1.3. Incorporate the updated model results into the proposed FERP following detailed design.

Biodiversity

- 2.1. Update the BDAR, BAM-C and spatial data to include the results of targeted surveys and expert reports completed during RTS.
- 2.2. Update the SAIL assessment for *Euphrasia arguta* following completion of targeted surveys.
- 3.1. If Yass Daisy is assumed present or observed during surveys, consult with CPHR to determine the relevant unit of measure for assessing project impacts.
- 4.1. Update Table 8.6 to remove reference to biodiversity offsets. Offsets are not a mitigation measure.
- 4.2. Revise the mitigation measures outlined in Tables 8.6 and 8.7 to include:
 - Clear definition and delineation of exclusion areas (no go zones), including areas that must not be cleared at certain times of the year such as key breeding periods.
 - Scheduling the clearing works for a time of year to avoid the breeding seasons of identified potential threatened species and other fauna that may breed on site.
 - Pre-clearing survey procedure such as nest and hollow searches should be detailed and completed within 48 hours prior to clearing.
 - Hygiene protocols should be included as per the Department's Hygiene guidelines amphibian chytrid fungus and invasive plants.
 - Communication should occur with rescue agencies and local veterinarians prior to the commencement of clearing to confirm the availability of resources for any captured/injured fauna that is unable to be released.
 - If threatened fauna are detected during pre-clearance surveys, an incidental finds protocol including comparative habitat assessments should be prepared for clearing sites and proposed release sites provided to ensure that habitat features are available in the release sites.
- 5.1. The endangered population of Squirrel Glider in Wagga Wagga can be removed as a candidate species and should be assessed through the species only listing. This approach reflects the intent of the *Biodiversity Conservation Regulation 2017*, which prevents new endangered population listings where the species is already listed. Some endangered population listings were transferred from the former *Threatened Species Conservation Act 1995* and remain in the system. These legacy listings may continue to appear in the BAM-C while they remain on the schedules of the *Biodiversity Conservation Act 2016* but should not be used for assessment purposes where the

species is also listed. Assessors should document this approach in the Biodiversity Assessment Report, including reference to this advice.

ATTACHMENT B Detailed advice for Mangoplah BESS EIS (SSD-77527735)

Flood Risk Management

CPHR has reviewed the flood risk management component in Section 6.8 of the EIS (and Appendix F.8).

The EIS does address the SEARs for flood risk management, contingent on the proponent addressing the issue identified below during the detailed design phase of the project.

1. The flood impact assessment should be updated to include the required upgrade works for the site access routes.

The flood impact assessment included in Appendix F.8 does not include consideration of the proposed upgrade works for the main site access roads (Route A & B). These upgrade works are likely to involve waterway crossing and road surface upgrades to make it suitable for use in the construction and operational phases of the project, as well as for emergency site evacuation during major floods.

CPHR recommends that once the site access route designs are developed, they are incorporated into the hydraulic model to accurately investigate the flood impacts. The outcomes of the additional modelling should be used to update the flood impact assessment and confirm that flood risks are within acceptable limits.

The updated flood modelling and mapping should also be incorporated into the proposed Flood Emergency Response Plan (FERP) for the project in consultation with Council and the NSW SES.

Recommendations:

- 1.1. During the detailed design, update the flood impact assessment once upgrade requirements for the site access roads are determined.
- 1.2. During the detailed design, confirm that flood risks are within acceptable limits.
- 1.3. Incorporate the updated model results into the proposed FERP following detailed design.

Biodiversity

The EIS addresses the SEARS for Biodiversity, however some minor updates are required to the BDAR at Appendix F.1.

2. Update the BDAR when further surveys and expert reports are completed.

The BDAR identifies that additional surveys and expert reports, for candidate species that have been assessed as assumed present, will be completed during the response to submissions (RTS) phase. Should these surveys and/or expert reports not be completed, assumed presence will need to be maintained.

Recommendations:

- 2.1. Update the BDAR, BAM-C and spatial data to include the results of targeted surveys and expert reports completed during RTS.
- 2.2. Update the SAIL assessment for *Euphrasia arguta* following completion of targeted surveys.

3. Review presence of ‘count’ flora species to ensure the credit liability is reliable.

Section 5.5 of the BDAR includes assumed presence for Yass Daisy (*Ammobium craspedioides*), which is currently a species with unit of measure assessed by count, based on an estimated 40 individual plants. The Department is currently considering changing the way the Yass Daisy is assessed through a potential unit of measure change. If this species is observed during further surveys or assumed presence is retained, the proponent must consult with CPHR via the BOS Help Desk to determine the correct unit of measure for assessment in the BDAR and if relevant an appropriate method for applying assumed presence.

Recommendations:

- 3.1. If Yass Daisy is assumed present or observed during surveys, consult with CPHR to determine the relevant unit of measure for assessing project impacts.

4. Mitigation measures need more detail to meet the requirements of the BAM.

To ensure the Construction Environmental Management Plan (CEMP) and the Biodiversity Management Plan (BMP) are effective, the mitigation measures at Section 8.4 and Tables 8.6 and 8.7 must be detailed and should follow SMART principles (specific, measurable, achievable, relevant, and time-bound).

Recommendations:

- 4.1. Update Table 8.6 to remove reference to biodiversity offsets. Offsets are not a mitigation measure.
- 4.2. Revise the mitigation measures outlined in Tables 8.6 and 8.7 to include:
 - Clear definition and delineation of exclusion areas (no go zones), including areas that must not be cleared at certain times of the year such as key breeding periods.
 - Scheduling the clearing works for a time of year to avoid the breeding seasons of identified potential threatened species and other fauna that may breed on site.
 - Pre-clearing survey procedure such as nest and hollow searches should be detailed and completed within 48 hours prior to clearing.
 - Hygiene protocols should be included as per the Department’s Hygiene guidelines amphibian chytrid fungus and invasive plants.
 - Communication should occur with rescue agencies and local veterinarians prior to the commencement of clearing to confirm the availability of resources for any captured/injured fauna that is unable to be released.
 - If threatened fauna are detected during pre-clearance surveys, an incidental finds protocol including comparative habitat assessments should be prepared for clearing sites and proposed release sites provided to ensure that habitat features are available in the release sites.

5. Remove credit duplication in the BAM-C.

Separate credit requirements have been identified for both the Squirrel Glider and the endangered population of Squirrel Glider in the Wagga Wagga Local Government Area.

Recommendations:

- 5.1. The endangered population of Squirrel Glider in Wagga Wagga can be removed as a candidate species and should be assessed through the species only listing. This approach reflects the intent of the *Biodiversity Conservation Regulation 2017*, which prevents new endangered population listings where the species is already listed. Some endangered population listings were transferred from the former *Threatened Species*

Conservation Act 1995 and remain in the system. These legacy listings may continue to appear in the BAM-C while they remain on the schedules of the *Biodiversity Conservation Act 2016* but should not be used for assessment purposes where the species is also listed. Assessors should document this approach in the Biodiversity Assessment Report, including reference to this advice.