

Biodiversity Management Plan

Riverina BESS Connection

State Significant Development (SSD 8392)

Stage 2b(ii)



CPP Project No: 12005

Current Revision			
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Task:	Responsibility:	Date:	Signature:
Developed by:	Luke Perabo		
SQE Review:	Jarrold Erbs		
Review by Responsible Site Manager (12005):	Michael Greaves		
Approved by Accountable Project Manager:	Luke Perabo		

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Table 1 – Revision Log

Revision Log		
From Revision	To Revision	Summary of Changes
0	1	<ul style="list-style-type: none"> Updated to incorporate Stage 2b of the Development and TG BDAR Updated Construction Activity Zone Map
1	1.1	<ul style="list-style-type: none"> Updated to include revised staging of Stage 2b (2b(i)/2b(ii)/2b(iii)) of the Project Updated to reflect details of TG BDAR approved BDAR (version 3.1) Updated to reflect amended Consent Conditions
1.1	2	<ul style="list-style-type: none"> Updated to reflect comments from BCD (9 December 2022)
2	3	<ul style="list-style-type: none"> Updated to reflect comments from BCD (11 January 2023)

1 Introduction

1.1 Background

Approval for the Development (**SSD 8392**) was granted on 7 December 2018 under Part 4, Division 4.1 of the NSW Environmental Planning and Assessment Act 1979 (**EP&A Act**). The Development Consent permitted the construction, operation and decommissioning of the DPSF, being a 275 MW photovoltaic solar farm and associated infrastructure, as well as an adjacent 100 MWh Battery Energy Storage System (**BESS**).

The Environmental Impact Statement (**EIS**) for SSD-8392 assessed the impacts of the Development on biodiversity. The Darlington Point Biodiversity Assessment Report (**DP BAR**) V07 (August 2018) was prepared to support the EIS. The report was prepared under the Framework for Biodiversity Assessment as part of the Biodiversity Offsets Policy for Major Projects.

A Modification (**SSD-8392-MOD-1**) to increase the battery capacity to 200 MW/ 400 MWh was approved in October 2021. DPE issued a Consolidated Consent, which did not alter the conditions relating to biodiversity (other than an administrative regulator name change).

Edify obtained approval from the Secretary in March 2022 to stage the Development on the basis that the scope of works for the BESS is distinct from the construction and operation of the Solar Farm stage of the Development. In April 2022, the Secretary approved the staging of the strategies, plans, programs, and sub plans associated with the construction, operation, and decommissioning of the BESS. The BESS is considered to be Stage 2 of the Development.

On 7 June 2022, the Secretary approved the further staging of the BESS Stage of the Development, being broken into Stage 2a: Site Preparation for the BESS, and Stage 2b: BESS battery components and connections to the TransGrid Substation. Stage 2a commenced construction in June 2022.

Edify prepared the Transgrid Substation Connection Biodiversity Development Assessment Report (V3.1, September 2022 (**TG BDAR**)) to assess the biodiversity values and impacts of Stage 2b of the Development.

On 14 October 2022, the Secretary approved the further staging of the BESS Stage 2b of the Development, being broken into:

- BESS Mechanical and Electrical Installation – Stage 2b(i)
- BESS connections to the Transgrid Substation – Stage 2b(ii)
- BESS connections to battery components – Stage 2b(iii)

A second Modification (**SSD-8392-MOD-2**) to:

1. create a new land parcel within Lot 1 DP1249830 to house the Riverina BESS Substation;
2. to allow for temporary construction areas to be utilised within the TransGrid Darlington Point Substation on Lot 2 DP628785; and
3. to provide the TG BDAR to demonstrate the biodiversity values and impacts have been properly assessed for Stage 2b of the Development.

was approved on 31 October 2022. DPE issued a Consolidated Consent, which amended conditions relating to the biodiversity and the biodiversity management plan requirements.

On 14 December 2022, Edify submitted a letter to the Department with the *Darlington Point – Additional Targeted Surveys & Revised BAM-Calculations* (OzArk, 2 December 2022) (**SSD-8392-MOD-2 Revised Biodiversity Credits Letter**) to request approval for a revised biodiversity credit liability calculation for Stage 2b(ii).

On 10 January 2023, the Planning Secretary approved (**SSD-8392-PA-56**) splitting the biodiversity credit liability for Stage 2b(ii) into two distinct areas consisting of a cable route and a laydown area. This was based on two field surveys being undertaken to confirm the presence/absence of previously assumed present species credit species, which resulted in a reduced total credit obligation. The Biodiversity and Conservation Division confirmed the accuracy of the ecosystem and species credit liability associated with the impacts described in the SSD-8392-MOD-2 Revised Biodiversity Credits Letter. The approval included revised tables detailing the ecosystem credit and species credit liability for SSD-8392-MOD-2, showing the split of credits required for each of the distinct areas – i.e., cable route and laydown areas.

The Development Consent issued by DPE, mitigation measures from the EIS and TG BDAR for Stage 2b, and the SSD-8392-MOD-2 Revised Biodiversity Credits Letter and approval for Stage 2b(ii) of the Development detail the requirements of this BMP.

1.2 Context

This Biodiversity Management Plan (**BESS BMP**) forms part of the Environmental Management Strategy (**EMS**) and the Construction Environmental Management Plan (**CEMP**) for Riverina Energy Storage System, being the BESS stage of the Development. The Solar Farm stage of the Development (or Stage 1) has completed construction, achieved registration as a generator in the National Electricity Market (**NEM**) and is now operational and exporting electricity to the grid.

This BMP should be read in conjunction with the Biodiversity Development Assessment Report - TransGrid Substation Connection - Darlington Point, September 2022 (**TG BDAR**) and the SSD-8392-MOD-2 Revised Biodiversity Credits Letter.

The TG BDAR determined Stage 2b(ii) works; involving the cable routes and trenching impact areas, and impacts to establish temporary construction areas for office, laydowns, and carparking within the TransGrid Substation (on Lot 2 DP628785). Subsequently, the establishment of temporary construction areas for office, laydowns, and carparking within the TransGrid Substation Lot were deemed not required. SSD-8392-MOD-2 Revised Biodiversity Credits Letter details the results of additional targeted flora surveys within the alignment of the cable routes on 23rd of November 2022 and additional targeted fauna surveys on 1st of December 2022 in order to further reduce the offset obligation in consideration of the cables routes and trenching impact areas only. This native vegetation impact generates an offsetting requirement of 7 Ecosystem Credits and 8 Species Credits. Edify intends to purchase or retire the necessary credits on the open market or, if not available, will offset credits through a direct payment into the Biodiversity Conservation Fund.

This BMP describes how impacts on biodiversity will be minimised and managed during construction of the BESS Stage 2b(ii) of the Development, namely the scope of works associated with Modification 2. The BESS

Stage, or Stage 2, of the Development was approved by the Secretary on 7 June 2022 to be further broken into Stage 2a: Site Preparation for the BESS (on Lot 1 DP1249830), and Stage 2b: BESS battery components and connections to the TransGrid Substation (on Lot 2 DP628785), with Stage 2b subsequently further split into Stage 2b(i); 2b(ii) and 2b(iii).

This BMP has been prepared to address the requirements of:

- New South Wales (NSW) Department of Planning and Environment (**DPE**) approved Development Consent (the **Development Consent**) (7 December 2018), and amended upon approval of SSD-8392-MOD-1 via a Modification of Development Consent on 22 October 2021, and further amended upon approval of SSD-8392-MOD-2 of Development Consent on 31 October 2022.
- All applicable legislation, during the construction and operation of the Project.
- Mitigation and management measures and Statements of Commitments (**SoC**) in the Darlington Point Environmental Impact Statement (EIS) and in the Response to Submissions (**RTS**) on the EIS and DP BAR and additional information provided by the proponent dated November 2018 (definition in determination).
- The Darlington Point Modification 1 Report (SSD 8392 MOD 1), June 2021, and the response to Request for Further Information (RFI 22899008), June 2021.
- Darlington Point Solar Farm development Staging Request (SSD-8392-PA-24), April 2022, acknowledging the Development is being staged with the Solar Farm (SF) Stage being Stage 1 and the BESS Stage being Stage 2. The Secretary approved the staging of the strategies, plans, programs, and sub plans associated with the with the construction operation, and decommissioning of the BESS Stage of the Development
- Biodiversity Development Assessment Report - TransGrid Substation Connection - Darlington Point, September 2022 (**TG BDAR**)
- The SSD-8392-MOD-2 Modification Report, July 2022, and the response to Request for Further Information (RFI-091205), 26 September 2022 (**Modification 2** or **SSD-8392-MOD-2**)
- SSD-8392-MOD-2 Revised Biodiversity Credits Letter, December 2022

Schedule 3, Condition 10A of the Development Consent states:

Prior to the carrying out works associated with Modification 2 that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 2 and Table 3 below, unless the Planning Secretary agrees otherwise.

The retirement of credits must be carried out in accordance with the NSW, Biodiversity Offsets Scheme and can be achieved by:

- (a) *Acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016;*
- (b) *Making payments into an offset fund that has been developed by the NSW Government; or*
- (c) *Funding a biodiversity conservation action that benefits the entity impacted and listed in the ancillary rules*

of the biodiversity offset scheme.

Table 2: Ecosystem Credit Requirements for Modification 2

Vegetation Community	PCT ID	Credits Required
<i>Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South-Western Slopes Bioregion.</i>	PCT 45	28
<i>Weeping Myall open woodland of the Riverina Bioregion and NSW South-Western Slopes Bioregion</i>	PCT 26	1

Table 3: Species Credit Requirements for Modification 2

Species	Credits Required
A spear-grass (<i>Austrostipa wakoolica</i>)	1
Claypan Daisy (<i>Brachyscome muelleroides</i>)	49
Mossgiel Daisy (<i>Brachyscome papillosa</i>)	33
Bindweed (<i>Convolvulus tedmoorei</i>)	21
Winged Peppergrass (<i>Lepidium monopolocoides</i>)	34
Lanky Buttons (<i>Leptorhynchos orientalis</i>)	33
Major Mitchell's Cockatoo (breeding) (<i>Lophochroa leadbeateri</i>)	20
Koala (breeding) (<i>Phascolarctos cinereus</i>)	2
Austral Pilwort (<i>Pilularia novae-hollandiae</i>)	50
Slender Darling Pea (<i>Swainsona murrayana</i>)	34
Silky Swainson Pea (<i>Swainsona sericea</i>)	34

The above tables have been further refined upon approval by the Planning Secretary (SSD-8392-PA-56) based on the SSD-8392-MOD-2 Revised Biodiversity Credits Letter, December 2022. The revised ecosystem credit and species credit liability for Modification 2 are specified in Tables 1 and 2 below:

Table 1: Ecosystem Credit Requirements for Modification 2

Vegetation Community	PCT ID	Credits Required for Cable Routes	Credits Required for Laydown Areas
<i>Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South-Western Slopes Bioregion.</i>	PCT 45	6	23
<i>Weeping Myall open woodland of the Riverina Bioregion and NSW South-Western Slopes Bioregion</i>	PCT 26	1	-

Table 2: Species Credit Requirements for Modification 2

Species	Credits Required for Cable Routes	Credits Required for Laydown Areas
Claypan Daisy (<i>Brachyscome muelleroides</i>)	-	38
Mossgiel Daisy (<i>Brachyscome papillosa</i>)	-	26
Bindweed (<i>Convolvulus tedmoorei</i>)	-	21
Winged Peppergrass (<i>Lepidium monopolocoides</i>)	-	26
Lanky Buttons (<i>Leptorhynchos orientalis</i>)	-	26
Major Mitchell's Cockatoo (breeding) (<i>Lophochroa leadbeateri</i>)	-	26
Austral Pilwort (<i>Pilularia novae-hollandiae</i>)	-	38
Slender Darling Pea (<i>Swainsona murrayana</i>)	8	26
Silky Swainson Pea (<i>Swainsona sericea</i>)	-	26

Schedule 3, Condition 12 of the Development Consent states:

Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:

(a) include a description of the measures that would be implemented for:

- *minimising the amount of native vegetation clearing within the approved development footprint.*
- *minimising the loss of key fauna habitat.*
- *managing potential indirect impacts on threatened and migratory species, including:*
 - *flora species, including Weeping Myall Woodland and Sandhill Pine Woodland.*
 - *fauna species, including Grey-crowned Babbler and Superb Parrot.*
- *rehabilitating and revegetating temporary disturbance areas.*
- *protecting native vegetation and key fauna habitat outside the approved disturbance areas;*
- *maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site.*
- *controlling weeds and feral pests.*
- *protecting and promoting the growth of native plant species (including PCT45) and controlling the growth of exotic ground cover.*

(b) include a seasonally-based program to monitor and report on the effectiveness of these measures against the detailed performance and completion criteria.

(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.

Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.

Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.

Schedule 3, Condition 12A of the Development Consent states:

Prior to carrying out works associated with Modification 2 that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must update the Biodiversity Management Plan referred to in condition 12 for works associated with Modification 2, in accordance with the Biodiversity Development Assessment Report (Revision 3.1, dated 20 September 2022).

1.2.1 Development Staging

The Development will be undertaken in four distinct stages, those being:

- Stage 1 – Construction and operation of the solar farm;
- Stage 2a – Site Preparation for the BESS;
- Stage 2b – BESS battery components and connections to the Transgrid Substation;
 - Stage 2b (i) – BESS Mechanical and Electrical Installation ;
 - Stage 2b (ii) – BESS connections to the Transgrid Substation ;
 - Stage 2b (iii) – BESS connections to battery components;
- Stage 3 – Operations; and
- Stage 4 – Decommissioning.

Stage 1 Construction and operation of the solar farm

- This work has been completed and the solar farm is now operational.

Stage 2a Site Preparation for the BESS - June to September 2022

- Preparation of construction, compound, laydown and parking areas
- Bulk earthworks inclusive of topsoil stripping, cut to fill, import to fill, capping layer and surfacing layer
- Road works including internal roads, kerbing, surfacing and interface with existing solar farm access road
- Security fencing delivery and installation, including post and sill foundations, perimeter chainmesh and weldmesh fencing and gates
- Landscaping and rehabilitation inclusive of trimming batters, table drainage, earth shaping and seeding
- Earth grid installation
- Stormwater drainage system inclusive of pits, pipes, headwalls and table drains
- Spill oil drainage system inclusive of pits, pipes, spill oil tank and headwalls

- 33kV direct buried cable installation within BESS yard (from RMU's to 33kV Switchgear building)
- Electrical pit and conduit system installation
- Equipment, structure and building foundations inclusive of major and minor foundations for the
- BESS and associated substation
- Ancillary equipment and minor structure deliveries

Stage 2b BESS battery components and connections to the Transgrid Substation - September 2022 to June 2023

Stage 2b(i) BESS Mechanical and Electrical Installation - (indicative timing: September 2022 to June 2023)

Stage 2b(i) activities are summarised below and comprise the delivery and landing of transformers, Megapacks, control and switchgear buildings, and electrical and mechanical installation aspects, excluding the battery connection and the HV transmission and communication cable works. Stage 2b(i) does not involve any native vegetation impacts.

- Major equipment delivery and landing/erection inclusive transformers
- Delivery and landing only of the Megapacks. The Megapacks must not be connected to any other equipment and specifically no cable terminations
- Control and switchgear buildings delivery and landing
- Mechanical and electrical installation of equipment inclusive of structural erection, landing of equipment, cable reticulation works, cabling and terminations (excluding Megapacks electrical installation)
- Connection switch bay construction at Darlington Point Substation

Stage 2b(ii) BESS connections to the Transgrid Substation - (indicative timing: October 2022 to June 2023)

Stage 2b(ii) works comprise the installation of the HV transmission and communication cable/s to the Transgrid substation, and the preparation and use of the temporary construction areas within the TransGrid Darlington Point Substation on Lot 2 DP628785. These activities are the subject of SSD-8392-MOD-2.

- Preparation and use of laydown, stockpile and office hardstand areas within Lot 2 DP628785
- 132kV underground cable works between Riverina BESS Substation and Transgrid Darlington Point Substation
- Electrical pit and conduit system installation between Riverina BESS Substation and Transgrid Darlington Point Substation
- Communications cable between Riverina BESS substation and Transgrid Darlington Point Substation

Stage 2b(iii) BESS connections to battery components - (indicative timing: November 2022 to June 2023)

Stage 2b(iii) works comprise the electrical works associated with the battery components.

- Electrical installation of the Megapacks inclusive of cabling and terminations

- Testing and commissioning

Stage 3 Operations, from 2023 through to 2048

- Operation of the plant for its 25yr life

Stage 4 Decommissioning, at end of life

- Full decommissioning of the site including removal and disposal of all installed components

1.3 Environmental Management System

The overall Environmental Management System for construction of the Project is described in the CEMP. This BMP is part of the environmental management framework for the Project. Mitigation and management measures identified in this BMP will be incorporated into the site specific CEMP.

Used together, the CEMP, BMP, strategies and procedures form management guides that clearly identify required environmental management actions for reference by personnel and contractors.

1.4 Project Description

The BESS is Stage 2 of the Development, and the BESS construction will involve the civil and structural works, installation of the battery packs and ancillary electrical infrastructure, and construction of the Riverina BESS 132/33kV Substation (RBESS Sub). The scope of works on Lot 2 DP628785 involving the connection into the TransGrid Darlington Point Substation via 132kV underground cable, control and communications conduits and the construction of a new switch bay at the existing TransGrid Darlington Point Substation will occur in parallel with the aforementioned activities, though will not commence at the same time.

A detailed infrastructure layout for Stage 2b(ii) is provided in Figure 1-1 and Figure 1-2 and includes the following components:

- 132kV underground cable (connections works).
- Control and communications cable conduits (connections works).

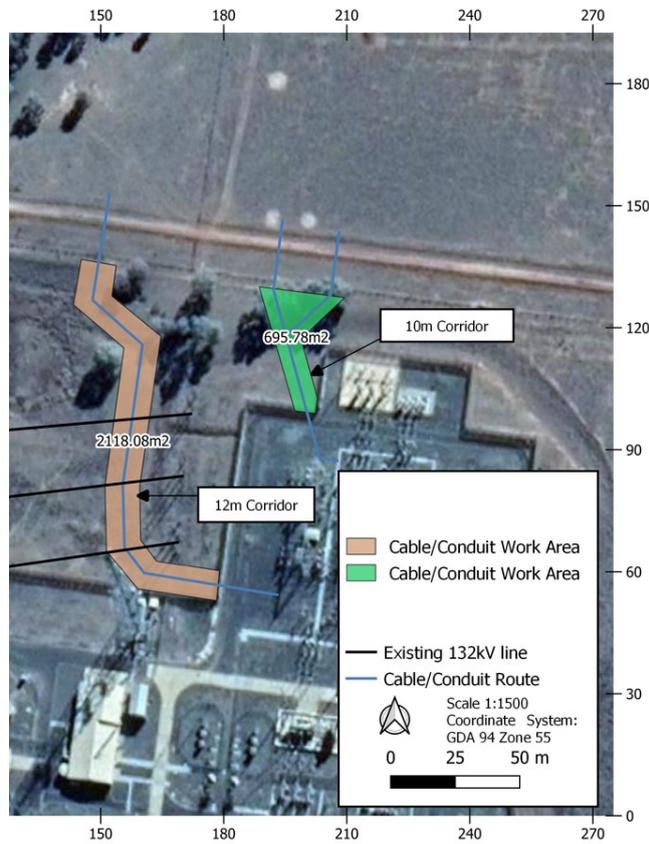


Figure 1-1: Stage 2b(ii) BESS Connection Cable Routes

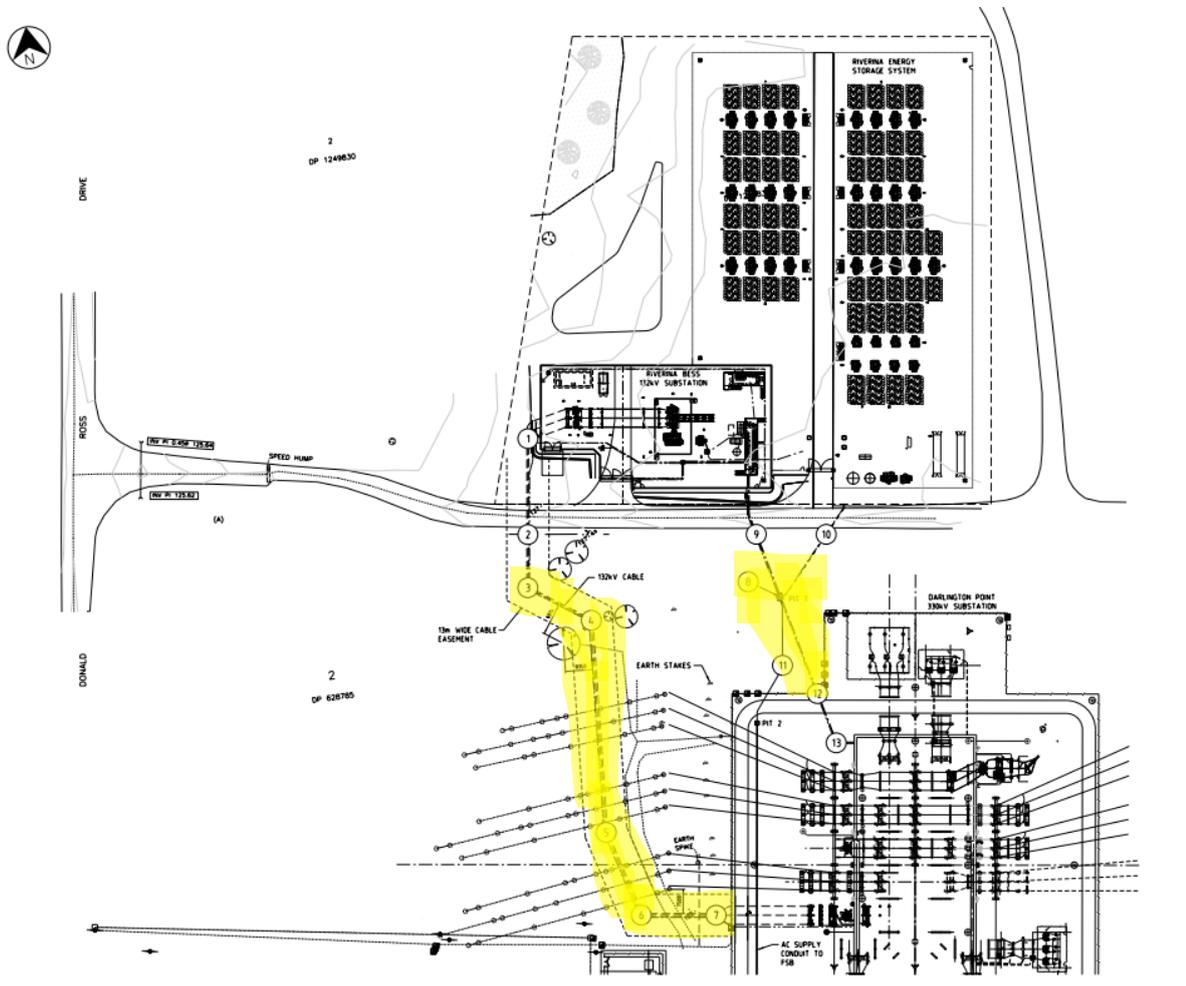


Figure 1-2: Connection into the TG DP Sub via 132kV underground cable, control and communications conduits on Lot 2 DP62875

Details of project and the methodology for construction, operation and decommissioning phases are described in Section 2 of the EIS.

1.5 Purpose of this BMP

The purpose of this plan is to describe how impacts on biodiversity relating to works associated with Modification 2 as a substage of the BESS Stage of the Development will be minimised and managed during construction of Stage 2b(ii). Note, this plan is for the construction works associated with Stage 2b(ii) only. Prior to operation of the BESS a revised BESS BMP will be prepared.

1.6 Objectives

The key objective of the BMP is to ensure that impacts to biodiversity are managed and are within the scope permitted by the planning approval.

This objective will be achieved by ensuring appropriate:

- controls and procedures are implemented during construction activities to avoid (where necessary) or minimise potential adverse impacts to biodiversity values in the disturbance areas.
- measures are implemented to address the mitigation measures detailed in the TG BDAR and CoC.
- measures are implemented to comply with all relevant legislation and other requirements as described in Section 3 of this BMP.

1.7 Targets

The following targets have been established for the management of biodiversity impacts during construction of the Project:

- Ensure full compliance with the relevant legislative requirements.
- Ensure full compliance with relevant requirements of the TG BDAR and CoC.
- No disturbance to biodiversity outside the construction footprint.
- Minimise disturbance to biodiversity within the Project area.
- No increase in distribution of high threat exotic flora currently existing within the Project site.
- No new high threat exotic flora introduced to the Project area.
- No fauna mortality during clearing and construction.
- No pollution or siltation of aquatic ecosystems, wetlands, endangered ecological communities or threatened species habitat.
- Rehabilitate all disturbed areas not required for the operation of the BESS.
- No revegetation or screening vegetation plantings within retained native vegetation areas (including ground cover).
- Active erosion will be managed and minimised.

1.8 Consultation

BMP DPSF was accepted by DPE to adequately allow for the biodiversity impacts and management of the SF Stage of the Development, including the BESS to be located within Lot 1 DP1249830, namely Stage 2a. DPE has approved the staging of the Development and request to submit and establish separate strategies, plans and programs for the BESS Stage of the Development. This BMP has been developed as a separate plan from the BMP DPSF, and includes all works associated with the BESS Stage of the Development.

Edify commenced consultation with DPE on the scope of this BMP in March 2022, including submission of a Staging Request letter, which resulted in acceptance of the staging of the Development such that the BESS Stage is acknowledged as a distinct stage from the SF Stage of the Development. The Secretary approved the staging of strategies, plans, programs and sub plans for the BESS Stage, including this BMP.

Edify commenced consultation with the Biodiversity, Conservation and Science (BCS) team on 6 April 2022 to discuss requirements for the preparation of this BMP. The consultation was paused while SSD-8392-MOD-2 was being prepared and assessed. This BMP has been prepared in accordance with the Consolidated Consent conditions issued with the SSD-8392-MOD-2 approval, received on 31 October 2022.

Revision 1.1 of the BMP was provided with BCS for review and comment. A letter was received from DPIE (Sender's ref: SSD-8392-PA-52) on 9 December 2022 with detailed comments for the Darlington Point BESS – Stage 2b(ii) – Biodiversity Management Plan (SSD-8392-PA-52). Following receipt the BMP was updated accordingly to address the comments. Table 1-1 outlines the feedback from BCD on 9 December 2022 following review of the BESS BMP, and how the issues have been addressed in the revised SSD-8392 2b(ii) BMP.

Table 1-1: BCD Comment and Response (9 December 2022)

No.	BCD Issue	How Addressed in BMP or Response	Relevant Section of SSD-8392 2b(ii) BMP
1	Impact of temporary site compound and laydown area has not been assessed	This area is not relevant to Stage 2b(ii) works. The BMP has been revised to specifically include only the scope and area associated with Stage 2b(ii) works – connection cables from Riverina Substation to Darlington Point Substation, with cable route trenching impacts inside the Darlington Point Substation land (Lot 2 628785).	Not relevant to SSD-8392 2b(ii) BMP
<p>Note: The temporary site compound and laydown area within Lot 2 DP1249830 was first impacted during the SF construction. If there are further issues to resolve with this area, this can be managed separate to the BESS project so as to avoid delays to the project.</p>			
2	The scope of the BMP needs to be clarified and consistent throughout the document	The BMP has been revised to specifically include only the scope and area associated with Stage 2b(ii) works – connection cables from Riverina Substation to Darlington Point Substation, with cable route trenching impacts inside the Darlington Point Substation land (Lot 2 628785).	Whole BMP

No.	BCD Issue	How Addressed in BMP or Response	Relevant Section of SSD-8392 2b(ii) BMP
3	Site-specific information must be sourced from the final approved Mod 2 BDAR	<p>The BMP has been revised to specifically include only the scope and area associated with Stage 2b(ii) works – connection cables from Riverina Substation to Darlington Point Substation, with cable route trenching impacts inside the Darlington Point Substation land (Lot 2 628785).</p> <p>Accordingly, only the site-specific information from the Mod 2 BDAR and the subsequent <i>SSD-8392-MOD-2 Revised Biodiversity Credits Letter</i> will be referenced in the SSD-8392 2b(ii) BMP.</p>	Whole BMP
4	Section 1.7 Targets should apply to any native vegetation	Section 1.7 wording amended to state revegetation or screening vegetation plantings within retained native vegetation areas (including ground cover).	Section 1.7
5	Section 2.1 Flora impacts does not identify relevant threatened flora, which is necessary to implement BDAR Action 4	<p>Section 2.1 of the SSD-8392 2b(ii) BMP has been revised to include the Slender Darling Pea (<i>Swainsona murrayana</i>).</p> <p>Bindweed (<i>Convolvulus tedmoorei</i>) is not present in the 2b(ii) impact areas. All other species credit species have been eliminated from the species credits and BAM calculator case associated with the cable routes, following the field verification surveys on 23 November and 1 December. This is reflected in the <i>SSD-8392-MOD-2 Revised Biodiversity Credits Letter</i>, which has been included as an addendum to the Mod 2 BDAR.</p>	Section 2.1.2
6	Section 2.1.1 incorrectly states that no threatened ecological communities (TEC) will be disturbed	Section 2.1.1 of the SSD-8392 2b(ii) BMP has been amended to reflect the impact to PCT 26 Myall Woodland	Section 2.1.1
7	High threat pest plants recorded in the BDAR have not been clearly identified or mapped	Section 9.5 has been amended to detail the three recorded High Threat Exotic weed species	Section 9.5

No.	BCD Issue	How Addressed in BMP or Response	Relevant Section of SSD-8392 2b(ii) BMP
8	Translocation policies in Section 3.1.2 are not relevant to rescue and relocation of fauna at development sites	Translocation policies in Section 3.1.2 have been removed for the SSD-8392 2b(ii) BMP.	Section 3.1.2
9	To meet CoA 12A, Section 4 'Commitments' must include measures and actions listed in BDAR Table 6-3	Section 4 has been amended to more clearly include the measures and actions listed in Mod 2 BDAR Table 6-3, as relevant to Stage 2b(ii) scope of works.	Section 4
10	Table 5-1 does not reflect the BDAR and contains incorrect information	Table 5-1 has been updated according to Mod 2 BDAR Table 6-2	Table 5-1
11	Biodiversity mitigation and management measures in Section 6 and Specific Works and Key Actions Required' in Section 7 do not relate to the BDAR	Table 6-1 has been revised to demonstrate each of BDAR actions 1 to 15 in Mod 2 BDAR Table 6-3 will be implemented, as relevant to Stage 2b(ii) scope of works. Table 7-1 has been removed	Table 6-1
12	Monthly monitoring during construction is inadequate	Section 8.3 has been amended to show monitoring during construction will be weekly rather than monthly "General" biodiversity monitoring removed from the BMP.	Section 8.3
13	Section 8.5 incorrectly states that the Project will not involve the clearing of native vegetation	This statement has been removed from Section 8.5.	Section 8.5
14	Section 9.2.5 'Re-use of coarse woody debris' does not apply to the development site	Section 9.2.5 has been amended to remove reference to 're-use of coarse woody debris'. Section 9.2.6 has been added to focus on bush rock as per Mod 2 BDAR Action 12	Section 9.2.5 details removed

No.	BCD Issue	How Addressed in BMP or Response	Relevant Section of SSD-8392 2b(ii) BMP
			Section 9.2.6 added
15	Section 9.3 Unexpected Threatened Species Finds Procedure needs to include threatened plants	Section 9.3 has been amended to include threatened plants	Section 9.3
16	Section 9.4 does not relate to Mod 2 and should be deleted	Section 9.4 has been deleted	Section 9.4 details removed Not relevant to Stage 2b(ii) BMP
17	Section 9.5 Pest and weed management protocol needs to clearly identify high threat weeds to be managed	Section 9.5 has been amended to detail the three recorded High Threat Exotic weed species	Section 9.5
18	Impact to biodiversity from firebreak construction was not assessed	Asset Protection Zones or firebreaks are not relevant to Stage 2b(ii), therefore not relevant to the SSD-8392 2b(ii) BMP	Section 9.7 details removed Not relevant to Stage 2b(ii) BMP
19	Rehabilitation and revegetation activities described in Section 9.8 have not been assessed for impacts to native biodiversity	Section 9.8 has been amended to detail the following: <ul style="list-style-type: none"> Re-seeding in areas that were previously, or are adjacent to, native vegetation (including areas without trees) must be with native species that are part of the mapped plant community type (PCT). any imported materials such as straw, mulch, topsoil or gravel must be certified free of weeds and pathogens. Binders and fertiliser must not be used within or adjacent to native vegetation. 	Section 9.8 Section 9.5.2

No.	BCD Issue	How Addressed in BMP or Response	Relevant Section of SSD-8392 2b(ii) BMP
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Refer to Section 9.5.2 for Weed Management Procedure.

Revision 2 of the BMP was provided to BCS for review and comment. Another letter was received from DPE (Sender's ref: SSD-8392-PA-52) on 11 January 2023 with further comments for the Darlington Point BESS – Stage 2b(ii) – Biodiversity Management Plan (SSD-8392-PA-52). Following receipt the BMP was updated accordingly to address the comments. Table 1-2 outlines the further comment from BCD on 11 January 2023 following review of the SSD-8392 2b(ii) BMP Rev2 (SSD-8392-PA-52), and how the issues have been addressed in the revised SSD-8392 2b(ii) BMP (Rev3).

Table 1-2: BCD Comment and Response (11 January 2023)

BCD issue	BCD Issue	Recommendations (9 December 2022)	Where addressed in SSD-8392 2b(ii) BMP Rev2	BCD additional request (11 January 2023)	Where addressed in SSD-8392 2b(ii) BMP Rev3
3	Site-specific information must be sourced from the final approved Mod 2 BDAR		Sections 1 & 2	<p>The relevant BDAR needs to be correctly identified. Previous versions are referred to in the BMP.</p> <p><u>BCD recommends</u></p> <p><i>3.1 Revise Section 1.1 (paragraph 6) to specify the Transgrid Substation Connection Biodiversity Development Assessment Report (BDAR) (V3.1, September 2022)¹</i></p> <p><i>3.2 Remove the first paragraph from Section 2.1 – it is inaccurate, potentially misleading, and not sourced from the BDAR.</i></p>	<p>Section 1.1 para 6 amended</p> <p>SSD-8392-MOD-2 Revised Biodiversity Credits Letter and SSD-8392-PA-56 (approval) have been included in Section 1.1 and 1.2, as this relates to approved revised biodiversity credit liability</p>

BCD issue	BCD Issue	Recommendations (9 December 2022)	Where addressed in SSD-8392 2b(ii) BMP Rev2	BCD additional request (11 January 2023)	Where addressed in SSD-8392 2b(ii) BMP Rev3
					Section 2.1 first sentence deleted and para 1 amended
6	Section 2.1.1 incorrectly states that no threatened ecological communities (TEC) will be disturbed	Refer to BDAR Section 6.1 – there will be impact to PCT 26 Myall Woodland, which is listed as endangered under the <i>Biodiversity Conservation Act</i> 2016.	Section 2.1.1 describes the Myall Woodland EEC but does not specify its location or requirements for protection outside of the areas to be cleared.	The BMP must clearly map the location of TECs present on the substation site to ensure their protection through measures 2, 3, 5 & 9 (Table 6-1). <u>BCD recommends</u> At a minimum: <i>6.1 Include a map of PCT 26 (Myall Woodland EEC) on the substation site. This is to be sourced from the BDAR spatial data (shown in BDAR Figures 5-2 and 5-3).</i> <i>6.2 Ensure the mapped area of PCT 26 (Myall Woodland EEC) is included in site induction and areas to be protected from development impacts.</i>	BDAR Figure 4-3 utilised in Section 2.1 (refer to Figure 2-1-1) Section 6 - Table 6-1 – Item 2 and 3 updated
11	Biodiversity mitigation and management measures in Section 6 and Specific Works and Key Actions Required' in Section 7 do	Table 6-1 and Table 7-1 should be revised to demonstrate each of BDAR actions 1 to 15 in BDAR Table 6-3 will be implemented. Table 7-1 performance target for direct impact to	Table 6-1 updated Table 7-1 removed	<u>Areas to be protected</u> Areas to be protected are referred to in various ways and not clearly defined or mapped. For example: - Vegetation Exclusion Zones (VEZ) in Table 6-1 and Section 9.2.1 – terminology replaced with 'No go zone' - 'No-go zones' in Table 8-1. – this terminology remains	'No Go Zone' is the terminology used in the TG BDAR. All references to these types of areas identified as 'No go zones'. Section 9.2.1 details updated and re-named

BCD issue	BCD Issue	Recommendations (9 December 2022)	Where addressed in SSD-8392 2b(ii) BMP Rev2	BCD additional request (11 January 2023)	Where addressed in SSD-8392 2b(ii) BMP Rev3
	not relate to the BDAR	native grassland is incorrect (42.83ha).		- 'Sensitive vegetation' is mentioned in Figure 9-2 but not defined or mapped. – reference to 'sensitive vegetation removed'	to 'No go zones'
	The Darlington Point Solar Farm EIS biodiversity assessment does not apply to the Mod 2 Stage 2b(ii) development site.			The description of a VEZ in Section 9.2.1 as protection around the 'dripline of woodland' is incorrect for the project site. <u>BCD recommends</u> 11.1 <i>Ensure a single term is defined for areas of native vegetation to be protected and used consistently throughout the BMP.</i> 11.2 <i>In the BMP, identify and map areas of native vegetation to be protected based on the BDAR.</i> 11.3 <i>Revise Section 9.2.1, Figure 9-2 and Section 9.2.4 to include all native vegetation (and threatened species habitat) in protection zones.</i> <u>Note:</u> any native vegetation outside the approved clearing area is threatened species habitat and 'sensitive vegetation', including grassland, wetland and "regrowth". All native vegetation must be included in the single term defining areas to be protected (e.g. VEZ).	Figure 9-2 amended to refer to 'construction footprint'. All areas of native vegetation outside of the 2b(ii) 'construction footprint' will be demarcated as 'No go zones' – see Figure 9-5. Section 9.2.4 revised to include '(and threatened species habitat)'.

BCD issue	BCD Issue	Recommendations (9 December 2022)	Where addressed in SSD-8392 2b(ii) BMP Rev2	BCD additional request (11 January 2023)	Where addressed in SSD-8392 2b(ii) BMP Rev3
12	Monthly monitoring during construction is inadequate	<p>Section 8.3 – monitoring during construction is to be weekly at a minimum, rather than monthly.</p> <p>If “general” biodiversity monitoring is to be undertaken, clarify the objectives and outcomes for Stage 2b(ii). Otherwise remove the requirement from the BMP.</p> <p>Also relates to weed aspects of rehabilitation program in Sections 9.8.1 & 9.8.3 (Issue 19).</p>	<p>Section 8.3, Section 9.5.2</p> <p>Sections 9.8.1 and 9.8.3</p>	<p>Weed monitoring should aim to ensure that the site management measures are working, and that surrounding native vegetation is not degraded by introduction or spread of exotic plants.</p> <p>Weed monitoring triggers in Section 8.3 and Table 8-1 do not appear to be based on survey data from the project site or current scientific knowledge.</p> <p>Monitoring for high threat weeds should be focused on the areas of identified risk in Table 6-1 – Actions 10 to 12. Spread of weeds into surrounding vegetation was identified in BDAR Table 6-2 as a potential impact.</p> <p>The management of invasive species is most effective when new incursions are detected early and rapid responses are implemented (NSW Invasive Species Plan 2018-22²). BDAR Table 6-3 identified the risk from weeds as ‘continuous’ during construction. Section 8.3 states there will be weekly ‘site’ monitoring, but Table 8-1 specifies quarterly weed assessments. Without an assessment of the life cycle of weeds to be monitored, BCD do not consider that quarterly monitoring is adequate to identify and remove establishing plants before they reproduce. For example, the NSW WeedWise website suggests control of</p>	<p>Section 8.3 and Table 8-1 updated</p> <p>Section 9.5.2 (9.5.2..2, Table 9-2, 9.5.2.7) updated to reflect monitoring requirements for weeds</p>

BCD issue	BCD Issue	Recommendations (9 December 2022)	Where addressed in SSD-8392 2b(ii) BMP Rev2	BCD additional request (11 January 2023)	Where addressed in SSD-8392 2b(ii) BMP Rev3
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Bathurst Burr is most successful when plants are young and actively growing³.

More regular monitoring is necessary to ensure that establishing high threat exotic plants can be eradicated before they spread. We suggest weekly during construction, and monthly for the first year after construction is finished.

Section 8.3 - PCT number is missing from the second high threat exotic trigger.

BCD recommends

12.1 Weed monitoring is to be weekly during construction and monthly over the first 12 months after construction.

12.2 Triggers for corrective action to high threat exotic plants (Section 8.3, Table 8-1) should be:

- *any new infestation*
- *any increase in cover or abundance (number of plants) at recorded locations.*

The BMP Revision 3 has been amended in accordance with feedback from BCS and will be submitted to the Planning Secretary.

2 Existing Environment

2.1 Flora impacts

This Stage of the Development has been designed to minimise clearing of native vegetation and threatened species habitats.

2.1.1 Vegetation Communities

The TG BDAR has assessed the impact areas associated with Stage 2b(ii) of the Development in Lot 2 DP628785, and determined the presence of two plant community types (PCTs), containing one PCT 26 (Remnant) and three PCT 45 (Remnant, Slashed, Planting) vegetation zones.

PCT 26 was confined to a small area (0.04 ha) with a single mature tree and diffuse patches of regrowth. This area was assigned to a single vegetation zone (26_Remnant). PCT 26 is associated with the following Threatened Ecological Communities (TECs):

- *Biodiversity and Conservation Act 2016* (BC Act)-listed Endangered Ecological Community (EEC): *Myall Woodland in the Darling Riverine Plains, Brigalow Belt South, Cobar Penneplain, Murray-Darling Depression, Riverina and NSW South Western Slopes bioregions*.
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)-listed EEC: *Weeping Myall Woodlands*.

The occurrence of PCT 26 fitted the criteria for listing under the BC Act, but not the EPBC Act, therefore 0.04 ha of the BC Act-listed EEC will be impacted by this stage of the Development.

A description of each vegetation zone is provided below:

- PCT 26_Remnant

A small open woodland community comprising a single mature tree and accompanying diffuse regrowth. Regrowth is mainly < 1m in height and is located up to 25 m from the mature tree. The understorey is in most respects identical to that of 45_Remnant, which abuts 26_Regrowth to the west, south, and east. To the north, the understorey grades into 45_Plantings. This zone meets the condition criteria to be considered a component of the BC Act-listed Endangered Ecological Community (EEC) *Myall Woodland in the Darling Riverine Plains, Brigalow Belt South, Cobar Penneplain, Murray-Darling Depression, Riverina and NSW South Western Slopes bioregions*. It does not meet the conditions for the equivalent EPBC Act-listed EEC, *Weeping Myall Woodlands*, as it falls below the 0.5 ha patch size threshold for that community.

- PCT 45_Remnant

A grassland typically lacking emergent trees or large shrubs. A sparse, sporadic layer of small shrubs was noted, which included the species Black Rolypoly (*Sclerolaena muricata*), Buckbush (*Salsola australis*), and Ruby Saltbush (*Enchylaena tomentosa*). Groundcover approaches 100% throughout and is dominated by

Plains Grass (*Austrostipa aristiglumis*), with Rigid Panic (*Walwhalleya proluta*), Wallaby Grasses (*Rytidosperma* spp.), Queensland Blue Grass (*Dichanthium sericeum* subsp. *sericeum*), Fairy Grass (*Sporobolus caroli*), and Windmill Grass (*Chloris truncata*) as subdominant species. A small number of forbs were recorded, including Quena (*Solanum esuriale*), Common Woodruff (*Asperula conferta*), and Small White Sunray (*Rhodanthe corymbiflora*), along with the herbaceous twiner Desert Bindweed (*Convolvulus clementii*) and the aquatic fern Nardoo (*Marsilea drummondii*). It is likely that many additional forb species would be detected within this zone in spring.

- PCT 45_Slashed

A grassland showing evidence of recent modification by slashing. While similar in species composition to 45_Remnant, native cover was markedly lower (typically <50%) and weed cover greater (typically >20%). Plains Grass, though still common, was less pronounced in these areas, with a greater proportion of overall coverage accounted for by Windmill Grass (*Chloris truncata*) and Queensland Blue Grass (*Dichanthium sericeum* subsp. *sericeum*). The shrub Black Rolyoly (*Sclerolaena muricata*) was present, though typically as slashed regrowth, and Buckbush (*Salsola australis*) was recorded in places, including along gravel road verges. This zone possessed a greater diversity of forbs than 45_Remnant; however, these forbs were mainly opportunistic colonisers not particular to any PCT, including Star Cudweed (*Euchiton sphaericus*), Jersey Cudweed (*Pseudognaphalium luteoalbum*), and Blue Crowsfoot (*Erodium cicutarium*). The Garland Lily (*Calostemma purpureum*) was recorded in this zone but was not detected in 45_Remnant.

- PCT 45_Planting

A grassland or artificial woodland, in which the zone 45_Remnant has been modified by the addition of planted canopy trees. These trees include both locally native species – chiefly River Red Gum (*Eucalyptus camaldulensis*) – and species not known to occur naturally in NSW, including a species resembling Gimlet (designated *Eucalyptus* sp. aff. *salubris*), though plant material necessary for identification of these non-indigenous species was not present. The shrub layer and understorey were otherwise similar 45_Remnant, though slightly sparser due to the presence of planted trees.

The TG BDAR also identified some non-native vegetation/gravel/bare ground areas, which represent the highly modified/ impacted areas within the TransGrid Substation land that have been used for carparking/ hardstand areas. These areas have been covered with gravel or similar material to the extent (and with the intent) that vegetation has not been able to regrow in those areas. In discussions with TransGrid it is known the TG DP Sub is subject to regular and routine maintenance activities to meet the safety and land management requirements relating to asset management of a major electrical substation and infrastructure. Processes employed by maintenance contractors include slashing and mowing the grassed areas at a frequency ensuring grass length is kept low. Some of the areas impacted by Stage 2b of the Development are non-native vegetation, including the proposed Substation Compound Area which is entirely on a non-native vegetation/gravel/bare ground area. Whilst the Stage 2b works has attempted to maximise the use of such non-native vegetation/gravel/bare ground areas, there will be impacts to native vegetation, albeit fairly minimal area in total.

A description of the non-native vegetation zone is provided below:

- Non-native

Designation of vegetation as non-native was reserved for highly modified areas surrounding the margins of the TransGrid substation and an active gravel parking area in the south of the subject land. In the former case, these marginal areas were dominated by Wild Oat (*Avena fatua*) and Perennial Ryegrass (*Lolium perenne*), often to the exclusion of all other species. In the latter case, the site is actively used for vehicle parking and only isolated plants were found to persist. The most common species in this area was the High-threat Exotic plant Khaki Weed (*Alternanthera pungens*). These areas were unsuitable for BAM plots, due either to the extremely small area of the zone or, in the case of the carpark, due to the presence of moving vehicles.

Vegetation community types, threatened flora found on site within the proposed construction footprint during biodiversity surveys, conducted in preparation of the TG BDAR are shown Figure 2-1. Figure 2-1-1 details the Vegetation Zones within the TransGrid Substation (on Lot 2 DP628785), including the construction footprint within this Lot, as mapped in the TG BDAR.



Figure 2-1: Vegetation Zones within the cable routes as mapped in the SSD-8392-MOD-2 Revised Biodiversity Credits Letter (December 2022)

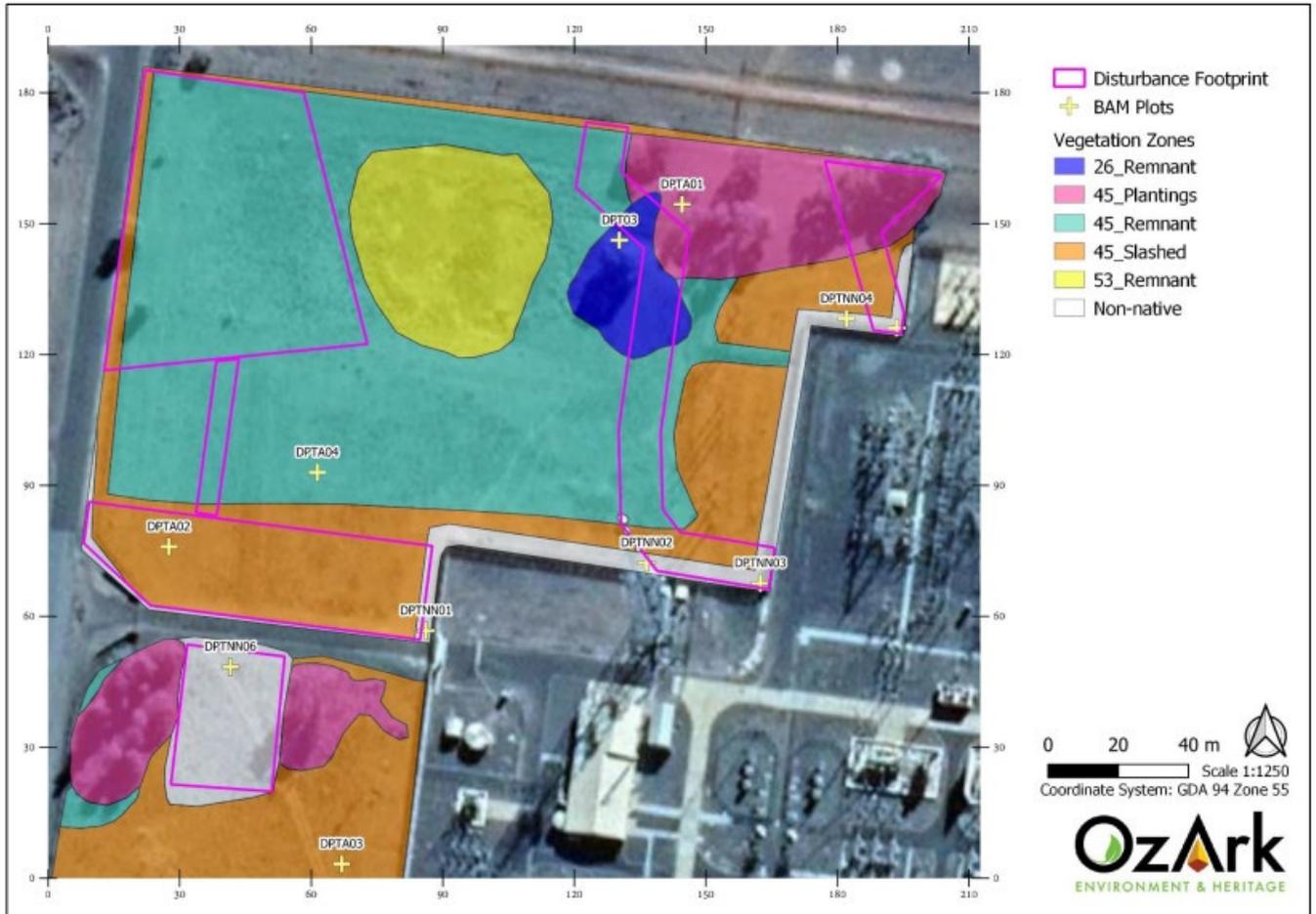


Figure 2-1-1: Vegetation Zones within the TransGrid Substation (on Lot 2 DP628785) as mapped in the Transgrid Substation Connection Biodiversity Development Assessment Report (V3.1, September 2022 (TG BDAR))

2.1.2 Threatened Flora

The following Species Credit Species generated by the BAM-C were assumed present across the whole of their associated PCT(s), as their indicated survey periods fell outside of the window of opportunity for targeted surveys.

- Slender Darling Pea (*Swainsona murrayana*) – see Figure 2-2.

If threatened species are identified in the Pre-Clearance Assessment the Unplanned Threatened Fauna Finds Procedure must be adhered to.



Figure 2-2: Photo of Slender Darling Pea (*Swainsona murrayana*)

2.2 Fauna impacts

Sixteen (16) fauna species, all native, were detected during the April/July 2022 field surveys. Two of the detected species are threatened:

- Superb Parrot (listed as vulnerable under the EPBC Act and BC Act).
- Grey-crowned Babbler (listed as vulnerable under the BC Act).

Neither of these species were found to be within the area to be occupied by the BESS or the BESS scope on the TransGrid Darlington Point Substation land (Lot 2 DP629830), and will not be impacted by the BESS Stage of the Development.

Due to the timing of the field surveys completed for the TG BDAR, and inability to complete targeted seasonal surveys, a number of ecosystem credit species and species credits species were included as assumed present unless one or more constraints indicated assumed absence. Refer to the TG BDAR for justification indicating the reason for excluding particular species.

3 Environmental Requirements

3.1 Relevant Legislation and Guidelines

3.1.1 Legislation

Legislation relevant to biodiversity management includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act).
- *National Parks and Wildlife Act 1974* (NPW Act).
- *Biodiversity Conservation Act 2016* (BC Act).
- *Protection of the Environment Operations Act 1997* (POEO Act).
- *Fisheries Management Act 1994* (FM Act).
- *Local Land Services Act 2013*.
- *Biosecurity Act 2015*.
- *Pesticides Act 1999*.
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in section 7 – Legal and Other Requirements of the CEMP.

3.1.2 Guidelines and standards

The main guidelines, specifications and policy documents relevant to this BMP include:

- Relevant recovery plans, priority action statements and best practice guidelines.
- DECCW. 2008. Hygiene protocol for the control of disease in frogs.
- Australian Standard AS 4373 Pruning of Amenity Trees.
- Australian Standard 4970 – 2009 Protection of Trees.

3.1.3 Development Consent

A Development Consent for the Darlington Point Solar Farm development (SSD 8392) was obtained in December 2018, and included a BESS capacity 50 MW/ 100 MWh. Modification 1 (SSD 8392 MOD 1), which increased the battery capacity to 200 MW/ 400 MWh, was approved in October 2021. The modification stated the BESS would remain in the same location within the approved development footprint, and would involve associated works including a connection to TransGrid's 132kV Darlington Point Substation.

Due to the modification approval, the conditions of consent were amended (as a Consolidated Consent on 22 October 2021), which is still referred to as the Development Consent.

A second Modification (SSD-8392-MOD-2) to:

1. create a new land parcel within Lot 1 DP1249830 to house the Riverina BESS Substation;
2. to allow for temporary construction areas to be utilised within the TransGrid Darlington Point Substation on Lot 2 DP628785; and
3. to provide the TG BDAR to demonstrate the biodiversity values and impacts have been properly assessed for Stage 2b of the Development.

was approved with amendments to conditions relating biodiversity and the biodiversity management plan requirements issued via a further Consolidated Consent on 31 October 2022. Again, this is referred to as the Development Consent.

3.1.4 Conditions of Consent

Schedule 3, Condition 12 of the Development Consent requires the development of a BMP to detail how construction and operation impacts on biodiversity will be minimised and managed. Specific conditions relating to biodiversity and/or which detail specific requirements for mitigation and management measures, as relevant for the BESS Stage of the Development, are detailed in Table 3-1 and Table 3-2.

Schedule 3 – Environmental Conditions – General

Table 3-1 Location of information in this BMP addressing the requirements of Conditions of Consent (Schedule 3)

Condition of Approval	Condition requirement	BMP Location
Land Management		
Schedule 3 CoC 8	Following any construction or upgrading on the site, the Proponent must: (a) Restore the ground cover of the site as soon as practicable; (b) Maintain the ground cover with appropriate perennial species; and (c) Manage weeds within this groundcover	Section 9.8
Biodiversity		
Schedule 3 CoC 10A	<i>Prior to the carrying out works associated with Modification 2 that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 2 and Table 3 below, unless the Planning Secretary agrees otherwise.</i>	Refer to this BMP

Condition of Approval	Condition requirement	BMP Location																																	
	<p><i>The retirement of credits must be carried out in accordance with the NSW, Biodiversity Offsets Scheme and can be achieved by:</i></p> <ul style="list-style-type: none"> <i>(a) Acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016;</i> <i>(b) Making payments into an offset fund that has been developed by the NSW Government; or</i> <i>(c) Funding a biodiversity conservation action that benefits the entity impacted and listed in the ancillary rules of the biodiversity offset scheme.</i> <p><i>Table 2: Ecosystem Credit Requirements for Modification 2</i></p> <table border="1" data-bbox="368 992 1155 1272"> <thead> <tr> <th>Vegetation Community</th> <th>PCT ID</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td><i>Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South-Western Slopes Bioregion.</i></td> <td><i>PCT 45</i></td> <td><i>28</i></td> </tr> <tr> <td><i>Weeping Myall open woodland of the Riverina Bioregion and NSW South-Western Slopes Bioregion</i></td> <td><i>PCT 26</i></td> <td><i>1</i></td> </tr> </tbody> </table> <p><i>Table 3: Species Credit Requirements for Modification 2</i></p> <table border="1" data-bbox="368 1350 1155 1794"> <thead> <tr> <th>Species</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td><i>A spear-grass (<i>Austrostipa wakoolica</i>)</i></td> <td><i>1</i></td> </tr> <tr> <td><i>Claypan Daisy (<i>Brachyscome muelleroides</i>)</i></td> <td><i>49</i></td> </tr> <tr> <td><i>Mossgiel Daisy (<i>Brachyscome papillosa</i>)</i></td> <td><i>33</i></td> </tr> <tr> <td><i>Bindweed (<i>Convolvulus tedmoorei</i>)</i></td> <td><i>21</i></td> </tr> <tr> <td><i>Winged Peppergrass (<i>Lepidium monopolocoides</i>)</i></td> <td><i>34</i></td> </tr> <tr> <td><i>Lanky Buttons (<i>Leptorhynchos orientalis</i>)</i></td> <td><i>33</i></td> </tr> <tr> <td><i>Major Mitchell's Cockatoo (breeding) (<i>Lophochroa leadbeateri</i>)</i></td> <td><i>20</i></td> </tr> <tr> <td><i>Koala (breeding) (<i>Phascolarctos cinereus</i>)</i></td> <td><i>2</i></td> </tr> <tr> <td><i>Austral Pilwort (<i>Pilularia novae-hollandiae</i>)</i></td> <td><i>50</i></td> </tr> <tr> <td><i>Slender Darling Pea (<i>Swainsona murrayana</i>)</i></td> <td><i>34</i></td> </tr> <tr> <td><i>Silky Swainson Pea (<i>Swainsona sericea</i>)</i></td> <td><i>34</i></td> </tr> </tbody> </table>	Vegetation Community	PCT ID	Credits Required	<i>Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South-Western Slopes Bioregion.</i>	<i>PCT 45</i>	<i>28</i>	<i>Weeping Myall open woodland of the Riverina Bioregion and NSW South-Western Slopes Bioregion</i>	<i>PCT 26</i>	<i>1</i>	Species	Credits Required	<i>A spear-grass (<i>Austrostipa wakoolica</i>)</i>	<i>1</i>	<i>Claypan Daisy (<i>Brachyscome muelleroides</i>)</i>	<i>49</i>	<i>Mossgiel Daisy (<i>Brachyscome papillosa</i>)</i>	<i>33</i>	<i>Bindweed (<i>Convolvulus tedmoorei</i>)</i>	<i>21</i>	<i>Winged Peppergrass (<i>Lepidium monopolocoides</i>)</i>	<i>34</i>	<i>Lanky Buttons (<i>Leptorhynchos orientalis</i>)</i>	<i>33</i>	<i>Major Mitchell's Cockatoo (breeding) (<i>Lophochroa leadbeateri</i>)</i>	<i>20</i>	<i>Koala (breeding) (<i>Phascolarctos cinereus</i>)</i>	<i>2</i>	<i>Austral Pilwort (<i>Pilularia novae-hollandiae</i>)</i>	<i>50</i>	<i>Slender Darling Pea (<i>Swainsona murrayana</i>)</i>	<i>34</i>	<i>Silky Swainson Pea (<i>Swainsona sericea</i>)</i>	<i>34</i>	
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Condition of Approval	Condition requirement	BMP Location
<p>Schedule 3 CoC 11</p>	<p>In the period between 2 years and 3 years from the commencement of operations, unless the Secretary agrees otherwise, the Applicant must commission an independent review of the impacts of the development on PCT45 and submit a subsequent report to the Secretary. This review and report must be undertaken by a suitably qualified, experienced and independent grasslands expert endorsed by the Secretary.</p> <p>The expert must:</p> <ul style="list-style-type: none"> (a) consult with BCS and the Applicant; (b) compare the actual impacts on PCT45 against that predicted in the EIS; (c) if the review concludes that the impacts on PCT45 are greater than that predicted in the EIS, calculate any additional biodiversity offset credit liabilities for the development over and above that specified in Column (a) of Table 1 above, in accordance with the <i>NSW Biodiversity Offsets Policy for Major Projects</i>; (d) document the findings in its report. <p>If the Secretary determines, after reviewing the expert's report, that the Applicant must retire additional biodiversity credits for PCT45, the Applicant must retire the additional credits within 12 months of the Secretary's determination, up to an aggregate maximum of that specified in Column (b) of Table 1 above.</p>	<p>This land has already been directly impacted with native vegetation permanently removed (complete loss of habitat) during the construction phase of the DPSF.</p>

Condition of Approval	Condition requirement	BMP Location
<p>Schedule 3 CoC 12</p>	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <ol style="list-style-type: none"> a. include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • minimising the amount of native vegetation clearing within the approved development footprint; • minimising the loss of key fauna habitat; • managing potential indirect impacts on threatened and migratory species, including: <ul style="list-style-type: none"> - flora species, including Weeping Myall Woodland and Sandhill Pine Woodland; and - fauna species, including Grey-crowned Babbler and Superb Parrot; • rehabilitating and revegetating temporary disturbance areas; • protecting native vegetation and key fauna habitat outside the approved disturbance areas; • maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and • controlling weeds and feral pests; • protecting and promoting the growth of native plant species (including PCT45) and controlling the growth of exotic ground cover; b. include a seasonally-based program to monitor and report on the effectiveness of these measures against the detailed performance and completion criteria; and c. include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p><i>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.</i></p>	<p>Refer to this BMP</p>

Condition of Approval	Condition requirement	BMP Location	
Schedule 3 CoC 12A	Prior to carrying out works associated with Modification 2 that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must update the Biodiversity Management Plan referred to in condition 12 for works associated with Modification 2, in accordance with the <i>Biodiversity Development Assessment Report</i> (Revision 3.1, dated 20 September 2022).	Refer to this BMP	
Decommissioning and Rehabilitation			
Schedule 3 CoC 29	Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 2.	Not relevant for construction BMP. To be detailed in Operational BMP	
	Table 2: Rehabilitation objectives		
	Feature		Objective
	Project site		<ul style="list-style-type: none"> Safe, stable and non-polluting. Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use.
	Solar farm infrastructure		To be decommissioned and removed, unless the Secretary agrees otherwise.
	Land use		<ul style="list-style-type: none"> Restore land capability to pre-existing use.
Community	<ul style="list-style-type: none"> Ensure public safety. 		

Schedule 4 – Environmental Management and Reporting

Table 3-2 Location of information in this BMP addressing the requirements of Conditions of Consent (Schedule 4).

Condition of Approval	Condition requirement	Location
Environmental Management		
Schedule 4 CoC 1	Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	Section 1.3

Condition of Approval	Condition requirement	Location
	<p>(a) provide the strategic framework for environmental management of the development;</p> <p>(b) identify the statutory approvals that apply to the development;</p> <p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and <p>(e) include:</p> <ul style="list-style-type: none"> • references to any plans approved under the conditions of this consent; and • a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	<p>Refer to the CEMP</p>
<p>Schedule 4 CoC 2</p>	<p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the:</p> <ul style="list-style-type: none"> • submission of an incident report under condition 4 of Schedule 4; • submission of an audit report under condition 6 or 7 of Schedule 4; or • any modification to the conditions of this consent. 	<p>Section 8</p>

Condition of Approval	Condition requirement	Location
<p>Schedule 4 CoC 3</p>	<p>With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> • <i>While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</i> • <i>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i> 	<p>Section 1 Section 8</p>
<p>Compliance</p>		
<p>Schedule 4 CoC 4</p>	<p>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 development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.</p>	<p>Section 8</p>
<p>Schedule 4 CoC 5</p>	<p>The Planning Secretary must be notified in writing via the Major Projects website within 7 days after the Applicant becomes aware of any non-compliance.</p>	<p>Section 8.5</p>
<p>Schedule 4 CoC 5A</p>	<p>A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p>	<p>Section 8.5</p>
<p>Schedule 4 CoC 5B</p>	<p>A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.</p>	<p>Section 8.5</p>
<p>Independent Environmental Audit</p>		

Condition of Approval	Condition requirement	Location
Schedule 4 CoC 7	Independent Audits of the development of the battery storage facility must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	Section 8.4
Schedule 4 CoC 7A	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 8.4
Schedule 4 CoC 7B	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 7 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	Section 8.4
Schedule 4 CoC 7C	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition 7 of Schedule 4 of this consent, or condition 7B of Schedule 4 where notice is given by the Planning Secretary (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. unless otherwise agreed by the Planning Secretary.	Section 8.4
Schedule 4 CoC 7D	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approvals Requirements (2020)</i> unless otherwise agreed by the Planning Secretary	Section 8.4
Schedule 4 CoC 7E	Notwithstanding the requirements of the <i>Independent Audit Post Approvals Requirements (2020)</i> , the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance	Section 8.4
Access to Information		

Condition of Approval	Condition requirement	Location
Schedule 4 CoC 8	<p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> the EIS; the final layout plans for the development; current statutory approvals for the development; approved strategies, plans or programs required under the conditions of this consent; the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; how complaints about the development can be made; a complaints register; compliance reports; any independent environmental audit, and the Proponent's response to the recommendations in any audit; and any other matter required by the Planning Secretary; and <p>(b) keep this information up to date.</p>	Section 8.5

4 Not Used

5 Environmental Aspects and Impacts

The scope of works for the BESS Stage of the Development include the works associated with Modification 2 for the connection cable routes and trenching impact areas. The works associated with Modification 2 are contained within Lot 2 DP629830 (TransGrid's Darlington Point Substation land) and the impacts will occur on land that it not owned or managed by the Development.

Key aspects of the Project that could result in impacts to biodiversity have been described in Table 5-1.

Table 5-1 Potential biodiversity impacts as a result of the project.

Nature of impact	Timing	Frequency	PCTs, threatened species and/or TECs impacted	Consequence of impact on biodiversity
Inadvertent impacts on adjacent habitat or vegetation	Construction phase	Possible	<ul style="list-style-type: none"> Native vegetation surrounding the disturbance footprint Threatened 	Increased edge effects, loss of foraging habitat, potential

Nature of impact	Timing	Frequency	PCTs, threatened species and/or TECs impacted	Consequence of impact on biodiversity
			species assumed present	mortality to neighbouring fauna
Reduced viability of adjacent habitat due to edge effects	Construction phase	Constant	<ul style="list-style-type: none"> Native vegetation surrounding the disturbance footprint Threatened species assumed present 	Degradation (possibly temporary) of native vegetation and habitat for threatened flora and fauna.
Reduce viability of adjacent habitat due to noise, dust or light spill	Construction phase	Common	<ul style="list-style-type: none"> Threatened species assumed present 	Minor foraging and breeding habitat for fauna may be altered or removed.
Transport of weeds and pathogens from the site to adjacent vegetation	Construction phase	Possible	<ul style="list-style-type: none"> Native vegetation surrounding the disturbance footprint 	Degradation (possibly temporary) of native vegetation.
Increased risk of starvation or exposure, and loss of shade or shelter	Construction phase	Rare	<ul style="list-style-type: none"> Threatened species assumed present 	Minor loss of foraging and refuging habitat
Loss of breeding habitat	Construction and Operation phase	Possible	<ul style="list-style-type: none"> Threatened species assumed present 	Minor (possibly temporary) loss of potential breeding habitat
Trampling of threatened flora species	Construction and Operation phase	Rare	<ul style="list-style-type: none"> Threatened species assumed present. 	Possible minor loss of threatened flora

Nature of impact	Timing	Frequency	PCTs, threatened species and/or TECs impacted	Consequence of impact on biodiversity
Rubbish dumping	Construction and Operation phase	Possible	<ul style="list-style-type: none"> • Native vegetation surrounding the disturbance footprint • Threatened species assumed present 	Degradation of native vegetation and habitat for threatened species

6 Biodiversity Mitigation and Management Measures

A range of mitigation requirements and control measures are identified in the TG BDAR and CoC. Specific measures and requirements to address impacts to biodiversity as relevant to the BESS Stage of the Development are outlined in Table 6-1. The measures have been listed to cover broad activities and as such there may be some repetition of mitigation measures.

Table 6-1 Biodiversity management and mitigation measures

Environmental Safeguards	Timing	Frequency	Mitigation Measure/Mechanism	Responsibility
Clearing and prevention of over-clearing				
1. No new areas to be cleared without further assessment.	Pre-disturbance	Continuous	<p>Construction footprint to be set-out by Surveyor and 'No go zones' established prior to commencement of construction</p> <p>Ongoing maintenance of 'No go zone' flagging and signage</p>	Site Manager/HSE Advisor
2. All personnel are to be inducted to be aware that disturbance of any stand of native vegetation outside the disturbance footprint, or otherwise unauthorised disturbance, could have legislative consequences if done without approval. Evidence of all personnel receiving an induction would be kept on file (signed induction sheets).	Pre-disturbance	Continuous	<p>Project specific induction to be prepared for Stage 2b(ii)</p> <p>All personnel involved in this stage of the Development to be inducted to Stage 2b(ii) prior to commencement of construction activities.</p> <p>Provide awareness training during site inductions and toolbox talks-emphasise the importance of native groundcover.</p>	Site Manager/HSE Advisor

Environmental Safeguards	Timing	Frequency	Mitigation Measure/Mechanism	Responsibility
			Ensure the mapped area of PCT 26 (Myall Woodland EEC) is included in site induction and areas to be protected from development impacts	
3. Before start of work, clearly identify the extent of permitted vegetation clearing and areas to be retained as native vegetation. Fencing or bunting installed to demarcate 'no go zones' where vegetation is to be retained.	Pre-disturbance	Continuous	<p>Construction footprint to be set-out by Surveyor and 'No go zones' established prior to commencement of construction</p> <p>Ensure the mapped area of PCT 26 (Myall Woodland EEC) has a 'No go zone' established and is protected from development impacts</p> <p>Ongoing maintenance of 'No go zone' flagging and signage</p>	Site Supervisor
4. A pre-clearing process and unexpected threatened species finds procedure is recommended. All personnel involved with the construction should be made aware of potential threatened flora and fauna present. In the event that threatened flora is discovered on site, works should cease in that location and a qualified ecologist should be consulted. Any fauna found during the disturbance are to be allowed (or assisted) to relocate into adjoining habitat. Any vegetation containing threatened fauna may not be	Pre-disturbance / During construction	<p>Development of unexpected finds procedure: One- off, prior to disturbance.</p> <p>Implementation of procedure: Continuous.</p>	<p>An Unplanned Threatened Flora and Fauna Species Procedure has been prepared (refer to Section 9.3 of this BMP)</p> <p>CPP Pre-Clearing assessment to be completed prior to clearing.</p> <p>Potential threatened flora and fauna present to be detailed within the Stage 2b(ii) induction.</p>	Site Manager/HSE Advisor

Environmental Safeguards	Timing	Frequency	Mitigation Measure/Mechanism	Responsibility
removed until the fauna has dispersed.				
5. Vegetation will be removed in such a way to avoid unnecessary damage to surrounding vegetation.	During construction	Continuous	<p>Area to be stripped of topsoil post assessment of the area. Removed vegetation to be stockpiled within the approved disturbance area.</p> <p>Clearing of trees within the construction footprint to be avoided where possible. Vehicles and plant to remain outside of the drip-line of trees within the construction footprint where possible.</p>	Site Supervisor
Bushfire protection				
6. As the subject land is not considered bushfire prone, no additional clearing for fire management is required. Should this requirement change, impacts to vegetation must be assessed according to the BAM.	Pre-disturbance	Identification of requirements: One-off, prior to disturbance.	<p>Fire Management shall be contained within the construction footprint.</p> <p>Transgrid Hot Works and Fire Risk Work Procedure to be strictly adhered to.</p> <p>Refer to Section 6.15.2 of the CEMP for Bushfire Mitigation Measures</p>	Site Manager/HSE Advisor
Soil management				

Environmental Safeguards	Timing	Frequency	Mitigation Measure/Mechanism	Responsibility
7. An erosion and sediment control plan will be developed and implemented within a Construction Environmental Management Plan (CEMP)	Pre-disturbance / During construction	Development of plan: One-off, prior to disturbance. Implementation of plan: Continuous.	A site specific CPP Erosion and Sediment Control Plan (ESCP) is to be prepared for Stage 2b(ii). This ESCP must implemented prior to the commencement of construction. Erosion and sediment control measures to be inspected as part of weekly Construction Inspections and post rainfall events. Erosion and sediment control measures to be maintained as required.	Site Manager/HSE Advisor

Damage to native vegetation outside of impact zone

8. Stockpile and compound sites are to be located within the assessed disturbance footprint and preferentially according to the following criteria: At least 40 m away from the nearest waterway. In areas of low ecological conservation significance (i.e. previously disturbed land). On relatively level ground.	Pre-disturbance / During construction	Identification of sites: One-off, prior to disturbance. Use of sites: Continuous.	Stockpile areas to be selected in accordance with the requirements of the Blue Book and documented on the ESCP. Stockpiling and storage of materials and machinery will occur only on designated direct disturbance areas within the construction footprint. Stockpiling and storage of materials will avoid the dripline (extent of foliage cover) of any native trees.	Site Supervisor
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Environmental Safeguards	Timing	Frequency	Mitigation Measure/Mechanism	Responsibility
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Stockpiles shall be established and maintained in accordance with the ESCP.

9. The CEMP must ensure that stockpiling of materials and equipment and parking of vehicles does not occur outside disturbance footprint, and that native vegetation outside the footprint is not otherwise disturbed.

Pre-disturbance

Development of plan: One-off, prior to disturbance.

The ESCP and TMP shall clearly document areas for stockpiling and parking of vehicles. These details shall be communicated in the Stage 2b(ii) project induction.

Site Supervisor

/ During construction

Implementation of plan: Continuous

These areas shall be clearly demarcated on site within the Stage 2b(ii) construction footprint.

Introduction and spread of significant weeds and pathogens

10. Construction machinery (bulldozers, excavators, trucks, loaders and graders) must be clean and free from soil or weeds before entry to the work site.

Pre-disturbance

Continuous

All vehicles, plant and machinery entering and leaving sites with weed infestations must be cleaned and free of weeds and pathogens.

Site Manager/HSE Advisor/Site Supervisor

/ During construction

Particular attention should be paid to the radiator, wheel wells, tyres, bumpers and undercarriage on the exterior and the carpets, floor mats and seats within the cab.

All plant, equipment and vehicles are to be cleaned down prior to arrival at site. If during the course of an inspection weed / seed contaminants are

Environmental Safeguards	Timing	Frequency	Mitigation Measure/Mechanism	Responsibility
			<p>identified the equipment or plant will be prohibited from entering site.</p> <p>CPP Weed and Hygiene Inspection to be completed for all vehicles and plant entering the Stage2b(ii) construction footprint.</p>	
11. Weed-free fill only to be used for on-site earthwork, if required.	During construction	Continuous	<p>All imported material will be certified weed and pathogen free prior to arrival to site.</p> <p>Suppliers must provide suitable certificate and testing prior to arrival to site.</p>	Site Manager
12. Any herbicide use is to be in accordance with the requirements on the label. Any person carrying out herbicide application would be appropriately trained and competent in its use.	During construction	Continuous	<p>Herbicide application will only be administered by authorised personnel with ChemCert accreditation – AQF 3 in accordance with SafeWork requirements.</p> <p>Herbicides will only be applied in accordance label instructions for that product.</p> <p>A Herbicide Application Record will be completed.</p> <p>Only herbicides registered for use near water may be used near any waterways.</p>	Site Supervisor/HSE Advisor

Environmental Safeguards	Timing	Frequency	Mitigation Measure/Mechanism	Responsibility
Disturbance to fallen timber, dead wood, bush rock and anthropogenic habitat				
13. Any bush rock encountered on site is to be relocated to the edge of the disturbance area to enhance habitat. Where possible, dead wood and hollow logs should be relocated to the edge of the disturbance area to enhance habitat.	During construction	Continuous	During clearing bush rock, dead wood and hollow logs shall be segregated for relocation. During rehabilitation works including topsoiling and re-seeding bush rock, dead wood and hollow logs shall be relocated to the edge of the disturbance area.	Site Supervisor
14. If fauna is detected, work must be stopped immediately and the area left undisturbed until the individuals have dispersed or suitably qualified personnel are engaged to facilitate their removal.	During construction	Continuous	The Unplanned Threatened Flora and Fauna Species in Section 9.3 shall be strictly adhered to for all fauna encountered on site.	Site Supervisor
Additional impacts				
15. Emergency spill procedures are to be developed in order to prevent environmental damage associated with chemicals, including fuel and herbicides.	Pre-disturbance / During construction	Development of procedures: One- off, prior to disturbance. Implementation of plan: Continuous	The Spill Management Plan in Section 6.9 of the CEMP must be adhered to for all spills	Site Supervisor

7 Not Used

8 Compliance Management

8.1 Roles and Responsibilities

The Project Team's organisational structure and overall roles and responsibilities for Stage 2b(ii) are shown in Figure 8-1.

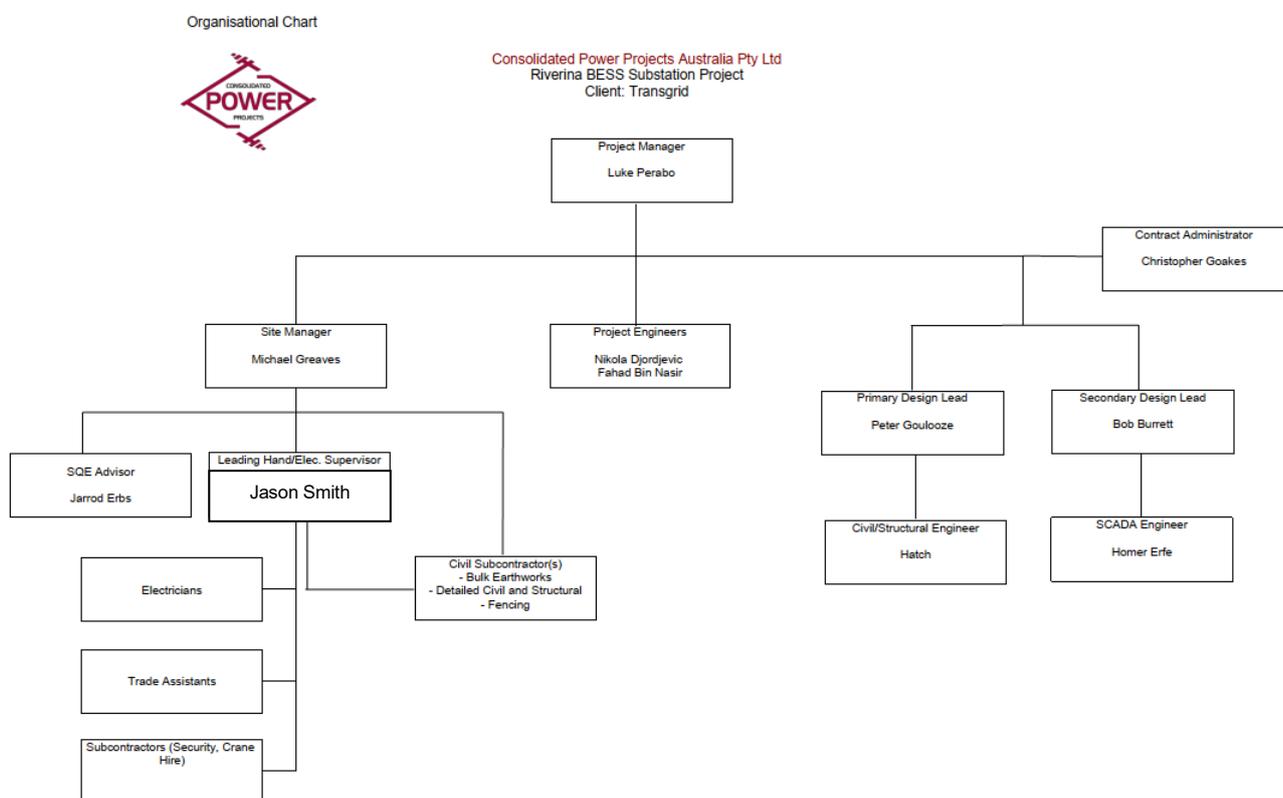


Figure 8-1: CPP Organisation Chart Stage 2b(ii)

Key responsibilities relating to managing biodiversity during construction are:

- CPP Project Manager is responsible for the development and maintenance of all management plans including the overarching environmental management strategy listed in the table of commitments (Section 4).
- The HSE Advisor manages the contracts with ecologists for environmental monitoring as directed by Development Consent (section 3.1.3).
- CPP Site Manager is responsible for ensuring groundworks occur onsite in accordance with the BMP.

This includes but is not limited to disturbance in designated areas only, traffic management restricting movements off internal access tracks, topsoil storage and reuse, rehabilitation of disturbed works are carried out as soon as practicable.

- The CPP Site Manager who manages the Pre Clearing Assessment Survey and records a running total of vegetation clearing within the development site.
- The CPP Site Manager is responsible for supervising construction workers and will ensure they are sufficiently trained in the protection of biodiversity and minimising disturbance detailed below. The CPP Site Manager in conjunction with the HSE Advisor will oversee weed control and rehabilitation of the site.
- The CPP Site Manager is responsible for implementing the Traffic Management Plan, which includes controlling and recording heavy vehicle movements onsite. Workers involved in installing the BESS infrastructure will be trained and directed to limit vehicle movements.

The operation of the site will be performed by Tesla. Tesla shall propose an appropriate organisational structure for the operation of the facility prior to commencement of operations. A BMP for the operation stage of the BESS Stage of the Development will be provided prior to commencement of operations.

8.2 Training

All employees, contractors and staff working on site will undergo induction training covering all procedures and protocols included within this BMP. Site induction provides an introduction to the ground disturbance permit and vegetation clearing processes, traffic movement restrictions and hygiene, threatened fauna identification and handling and locations of environmentally sensitive areas. Further details regarding staff induction and training are outlined in the EMS.

Staff and contractors will attend pre-commencement meetings at the beginning of each shift, which will include the details of any urgent biodiversity matters such as any breached of protocols or procedures. Longer toolbox meetings will occur weekly where staff and contractors will be made aware of any less urgent biodiversity matters and reinforce training on implementing protocols and procedures.

8.3 Inspections and Monitoring

Inspections of sensitive areas and activities with the potential to impact biodiversity will occur weekly for the duration of construction. Monitoring and evaluation of success will include a reflection on the seasonal conditions for the previous period.

Monitoring during construction will be weekly inspections of high disturbance areas, groundcover, protected woodland areas and boundary fence lines. These weekly inspections will include:

- A review of any fauna killed or injured. Threatened fauna mortalities will be reported to OEH.
- Fauna relocations relating to vegetation clearing will be recorded.
- Areas of high and low threat exotic plants will be recorded.

Trigger points for corrective action include:

- Damaged exclusion fencing or signage.
- Any storage or infrastructure located underneath driplines of trees.
- Presence of injured or deceased fauna.
- Scours greater than 50 mm deep and 100 m long.
- Any new high threat exotic plant infestation
- Any increase in high threat exotic plant cover or abundance (number of plants) at recorded locations.
- Observed feral animals or observations from neighbours.

A monitoring program summary is provided in Table 8-1.

Biodiversity Management Plan

Riverina BESS Connection

CPP Project No: 12005

Table 8-1 Monitoring Program Summary – Minimum Requirements

BMP Section	Monitoring Action	Timing/ Frequency	Responsibility	Decision Trigger / Adaptive Response	Reporting
Pre-construction					
Section 9.2	Inspection of 'No go zone' marking and fencing including individual trees.	At commencement of Project	HSE Advisor and Site Manager	If fencing is damaged it is rectified.	On-site reporting.
Section 9.2	Survey before removal of non-native and non-hollow bearing tree vegetation.	Before clearing commences on-site	HSE Advisor and Site Manager	Engage a suitably qualified ecologist if native fauna is found	Pre Clearing Assessment Survey.
Section 9.2	Survey before removal of native and hollow bearing tree vegetation. Hollows to be re-checked prior to clearing.	Before clearing commences on-site	Suitably qualified ecologist	Implement fauna handling procedure if native fauna is found roosting in hollows.	Ecologist Report.
Section 9.2	Visual inspection of vegetation clearance activities.	Weekly	HSE Advisor and Site Manager	Clearing not aligned to survey, clearing to cease immediately.	On-site reporting. Pre Clearing Assessment Survey.

Biodiversity Management Plan

Riverina BESS Connection

CPP Project No: 12005

BMP Section	Monitoring Action	Timing/ Frequency	Responsibility	Decision Trigger / Adaptive Response	Reporting
Section 9.2	Issue Pre Clearing Assessment Survey.	Weekly during Construction.	HSE Advisor and Site Manager	Work will cease if not aligned to Pre Clearing Assessment Survey.	On-site reporting.
Section 9.5	Weed dilapidation survey to be completed prior to clearing	Before clearing commences on-site	Suitably qualified ecologist	Construction not to commence until dilapidation report is completed.	Ecologist Dilapidation Report.
During construction					
Section 9.2	Visual inspection of vegetation clearance activities.	Regularly – at least weekly.	HSE Advisor and Site Manager	If lack of exclusion fencing leads to damage to retained vegetation, stop work and report incident. Reinstate exclusion fencing as required. Incident to be detailed at staff and contractor pre- commencement meetings at the beginning of each shift	Project Manager to inform DPE of non-compliance within 7 days. Project Manager to inform BCS immediately of incidents causing harm to threatened species, or ecological communities.
Section 9.5	Maintain a log of salvaged animals and actions taken to relocate them.	As required	HSE Advisor and Site Manager	If threatened species are identified, then triggers a review and report.	On-site reporting.

Biodiversity Management Plan

Riverina BESS Connection

CPP Project No: 12005

BMP Section	Monitoring Action	Timing/ Frequency	Responsibility	Decision Trigger / Adaptive Response	Reporting
Section 9.5	Inspections for fauna where footings have been left overnight.	Daily as required.	HSE Advisor and Site Manager	No work to proceed until fauna removed from footings.	On-site reporting.
Section 9.8	Inspection of rehabilitation works during construction.	Weekly.	HSE Advisor and Site Manager	N/A	On-site reporting.
Section 9.8	Inspection to detect high and low threat exotic plant cover throughout site	Weekly (during construction) Monthly (over the first 12 months post construction)	HSE Advisor and Site Manager	Any new infestation Any increase in cover or abundance (number of plants) at recorded locations.	On-site reporting.
Operation – Not Used (Construction Plan Only)					

8.4 Auditing

The HSE Advisor will maintain a compliance register for the Project to ensure audits and reporting requirements are met within scope and within set timeframes. The compliance register will include a list of Development Consent conditions and biodiversity commitments identified the EIS, RTS, DP BAR, TG BDAR and this BESS BMP.

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this BMP and compliance with other relevant approvals, licenses and guidelines including:

- Independent Environmental Audit of the development of the battery storage facility to be conducted and carried out in accordance with the relevant *Independent Audit Post Approval Requirements* (DPE 2020).
 - Within 3 months of commencing construction, and
 - Within 3 months of commencement of operations.
- The Independent Environmental Audit must be reviewed and responded to; the Report and response must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection; and the Independent Audit Report and response to it is to be made publicly available within 60 days of submission to the Planning Secretary.

Corrective measures or actions to improve the environmental performance of the Project recommended by auditors will be reviewed by the senior management team and incorporated into strategies, plans or programs required under by the Development Consent.

The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.

Additional audit requirements are detailed in the CEMP.

8.5 Reporting

Reporting requirements and responsibilities are documented in detailed in the CEMP.

Documentation required under the Development Consent to be made available publicly will be done so in a timely manner in accordance with the requirements of the Development Consent.

CPP will document the outcomes of pre-construction surveys required by the Development Consent and RTS.

The Project Manager will inform DPE of any non-compliance incident within 7 days of occurrence.

Any additional mitigation or management measures relevant to biodiversity have been incorporated into Section 6 of this BMP as required.

Any independent environmental audit, and the Project response to the recommendations in/from any audit will be made publicly available on the internet. Any other biodiversity matter will also be made publicly available as required by DPE.

8.6 Review and Improvement

This BMP will be reviewed every three years, for as long as the BMP is relevant. Continuous improvement of this BMP will be achieved by the ongoing evaluation of performance against the BMP environmental policies, objectives and targets to identify opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets.

9 Protocols and Procedures

9.1 Pre-Clearing Assessment Survey Process

The Pre-Clearing Assessment Survey process is integral to communicate the distinction between vegetation projection areas and the ground disturbance footprints which contractors will be working within. This process is also vital to enable the Contractor to track and control vegetation clearing prior to commencement of clearing activities.

The Pre-Clearing Assessment Survey process is managed by the CPP Site Manager and is summarised below;

- Contractors are informed within their contract and site induction that all ground disturbing activities require them to obtain a Pre-Clearing Assessment Survey prior to undertaking the work.
- The Pre-Clearing Assessment Survey form is available in hard copy at the site office and must be issued by the CPP Site Manager before the work is undertaken.
- The CPP Site Manager will compare the proposed ground disturbance area to the project footprint detailed in the current approved development design.
- The CPP Site Manager will visit the site if required and mark out vegetation projection areas and buffer zones if applicable.
- The CPP Site Manager will either issue the excavation permit corresponding to the relevant Pre-Clearing Assessment Survey or contact the contractor for further clarification.

- Once the excavation permit has been issued, the contractor may undertake ground works as per their contract.
- Once the work has been completed (date specified in the permit), the CPP Site Manager will inspect the site, request any additional clean up or remediation activities and sign-off that the conditions of the permit have been met.
- The CPP Site Manager will then record the disturbed area as part of a running total disturbed area for the project.

An example of the Pre-Clearing Assessment Survey form is provided in Figure 9-1 below.

Figure 9-1: Pre-Clearing Assessment Survey Form

Pre-Clearing Assessment Survey



Project Name		Project No.	
Project Manager		Site Manager	
Person Completing		Date	
Area of Project			

Identify what permits are required prior to clearing?			
Who is responsible for obtaining these permits?			
		<input type="checkbox"/> Client	<input type="checkbox"/> Principal Contractor
		<input type="checkbox"/> CPP	
Is permission required from landowners prior to clearing?			
		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Who obtains permission from the landowners?			
		<input type="checkbox"/> Client	<input type="checkbox"/> Principal Contractor
		<input type="checkbox"/> CPP	
List types of dominant vegetation	1.	2.	3.
	5.	6.	7.
	8.		
Will areas of dominant vegetation be impacted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Will loss of dominant vegetation be considered significant?
Identify on the following map areas of dominant vegetation			(If yes – contact the WHSE Manager)
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
Are there areas of significant vegetation in or surrounding the work area?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Will these areas of significant vegetation be affected by land disturbance? (If yes – contact the WHSE Manager)
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
If applicable list types of significant vegetation?	1.	2.	3.
	5.	6.	7.
	8.		
Are controls required to prevent impact to dominant vegetation or significant vegetation?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	If applicable what controls are required to prevent impact to vegetation?

Pre-Clearing Assessment Survey



1.
2.
3.
4.

<p>Are there areas of significant weed infestation in or surrounding the work area?</p> <p>If "Yes" list types and what controls are required?</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	Types
			Controls
<p>Are there areas of significant cultural heritage in or surrounding the work area?</p> <p>If "Yes" list types and what controls are required?</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	Types
			Controls

Pre-Clearing Assessment Survey



<p>Is there any fauna within the work area that may be impacted by land disturbance?</p> <p>If "Yes" list types and what controls are required?</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	Types
			Controls
<p>Are there areas of significant cultural heritage within the work area?</p> <p>If "Yes" list types and what controls are required?</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	Types
			Controls

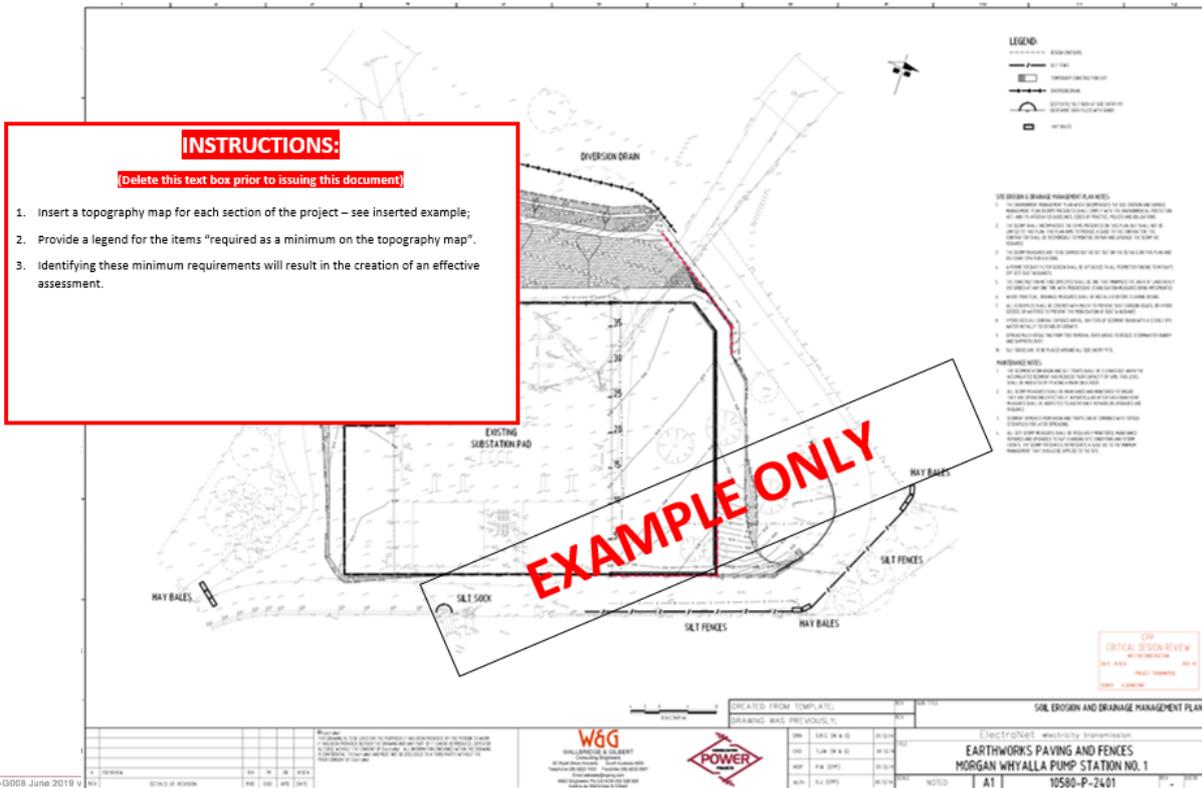
Pre-Clearing Assessment Survey



Pre-clearance assessment survey map (The following items are required as a minimum)			
<input type="checkbox"/> North point	<input type="checkbox"/> Existing Access Roads	<input type="checkbox"/> Laydown areas	<input type="checkbox"/> Retained vegetation & protected areas
<input type="checkbox"/> Existing Access Roads	<input type="checkbox"/> New temporary access roads	<p>INSTRUCTIONS:</p> <p>(Delete this text box prior to issuing this document)</p> <p>As these items are added to the site map, please check them off this list.</p>	
<input type="checkbox"/> Construction Activity Zone	<input type="checkbox"/> No Go Zones		
<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>		

<p>The following general procedures will be considered by the Site Manager;</p> <ol style="list-style-type: none"> a) Machinery and vehicles are to remain on existing access tracks to minimize disturbance to any existing ground cover. Any ground cover disturbed as a result of the works is to be restored to former condition on project completion. b) Native fauna will not be intentionally disturbed and the advice of the client's Environmental Representative sought if the likelihood of such disturbance arises; c) All personnel entering the site will be made aware during site induction training about the presence of potential threatened species and endangered ecological communities; d) If during the course of the project CPP personnel become aware of the presence of threatened species, populations or endangered ecological communities or their habitats, that were not identified and assessed in the REF (if applicable) and which are likely to be affected by the activity the following will steps will be followed; <ul style="list-style-type: none"> • Immediately cease work likely to affect the threatened species, populations or endangered ecological communities or their habitats; • Inform the relevant statutory authority as soon as practicable by phone, electronically or in writing; • Do not recommence work likely to affect the threatened species, populations or endangered ecological communities or their habitats until receiving written advice from the relevant authority; 	<ol style="list-style-type: none"> e) Any deep excavations (greater than 1.5 metres deep) left open at night will have a ramp/opening installed to allow access for any fauna to escape or will be or will be completely covered, with cover being secured, therefore not requiring ramps.
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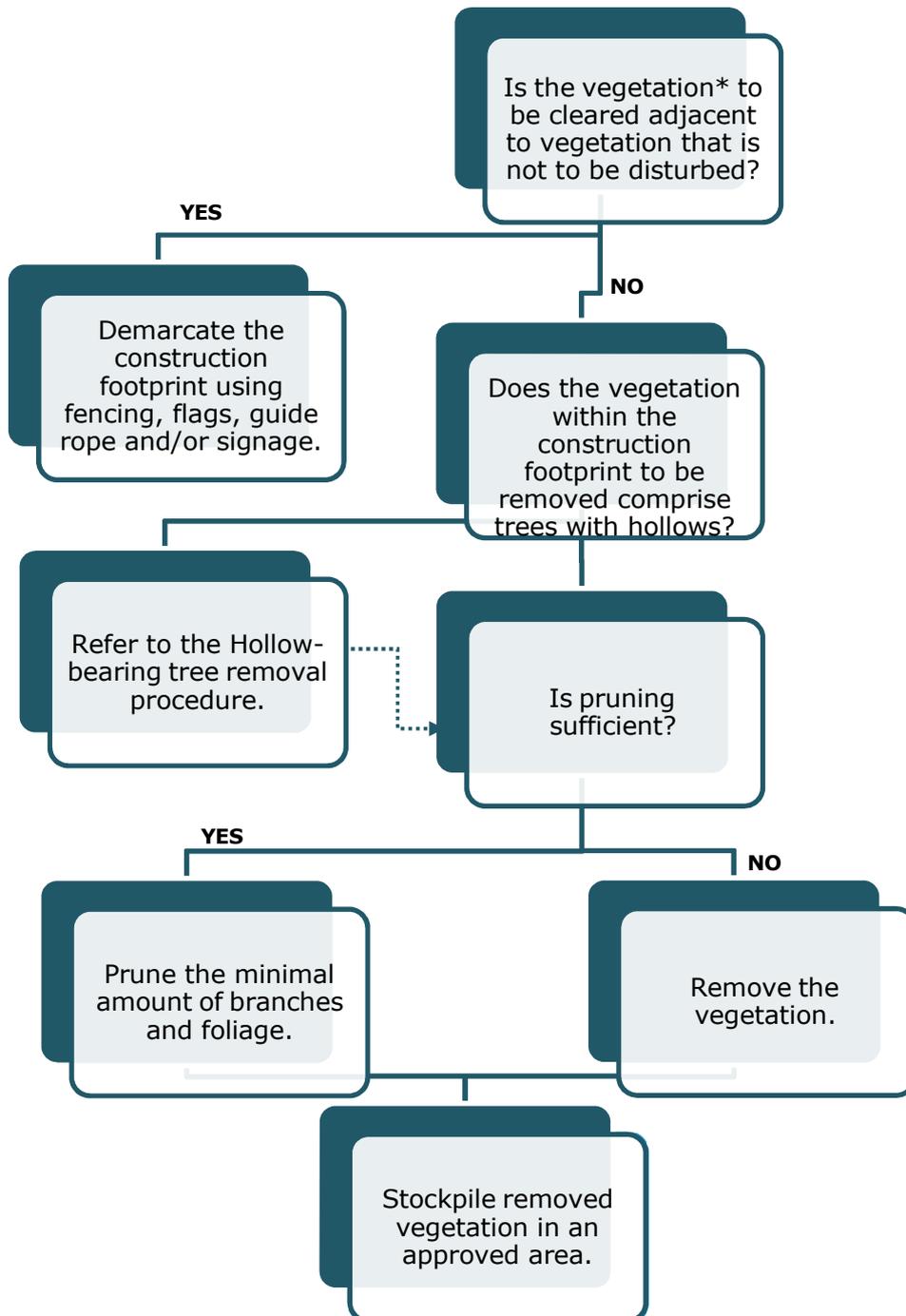
Pre-Clearing Assessment Survey



9.2 Vegetation Clearance Procedure

When undertaking vegetation clearing, the following process shown in Figure 9-2 must be followed to minimise the area of disturbance and the amount of vegetation to be cleared.

Figure 9-2: Vegetation Clearance Procedure



9.2.1 'No go zones'

'No go zones' are defined as any native vegetation outside the approved clearing area, i.e. outside the construction footprint'.

'No go zones' will be protected by exclusion fencing and signage (e.g. Figure 9-3 and Figure 9-4) to ensure that this vegetation is not impacted accidentally.



Figure 9-3: Example of 'No go zone' signage



Figure 9-4: Example of 'No go zone' fencing/flagging

Areas outside of the construction footprint detailed in Figure 9-5 will be established as 'No go zones'.

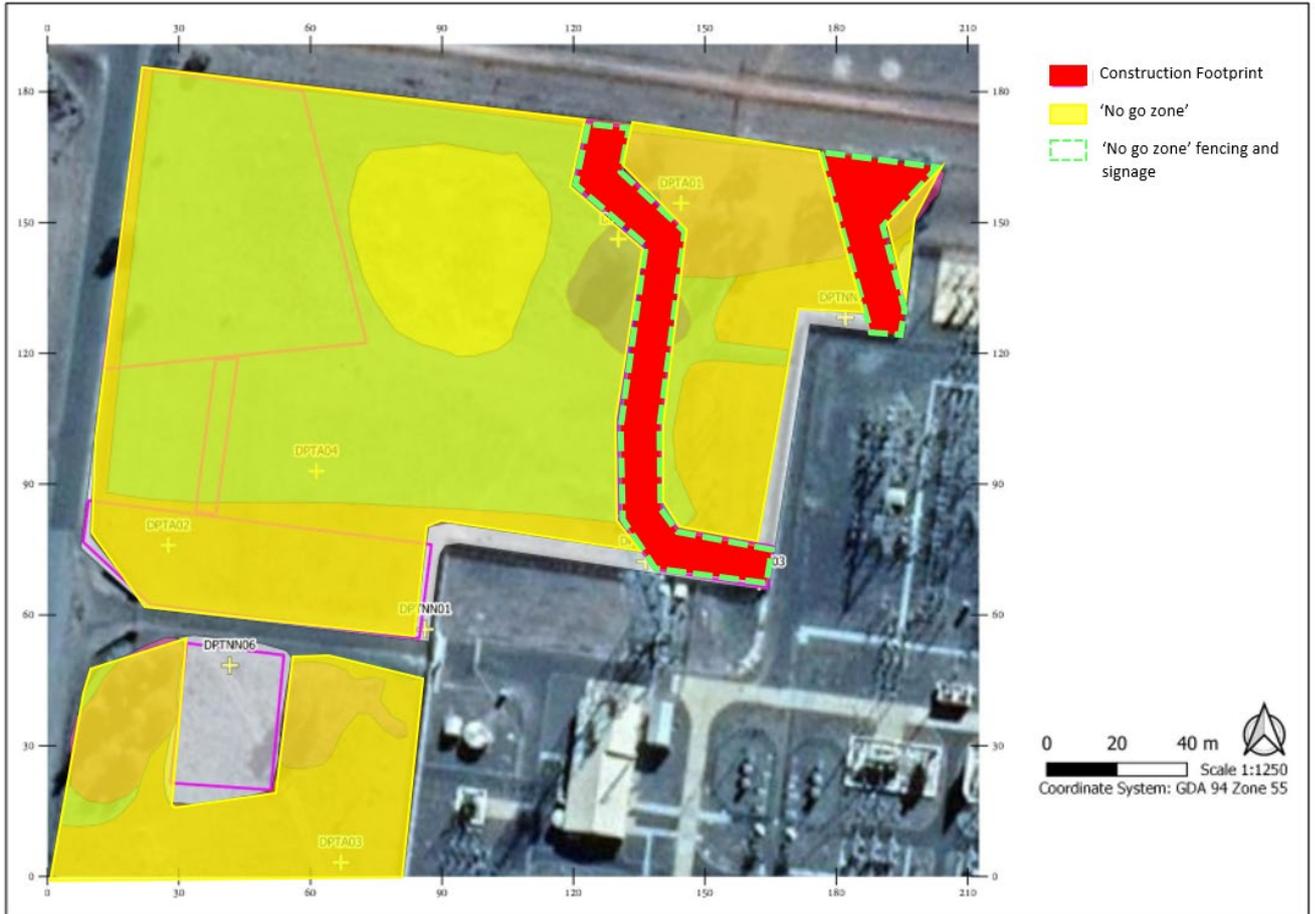


Figure 9-5: 'No go zone' Fencing and Signage Location

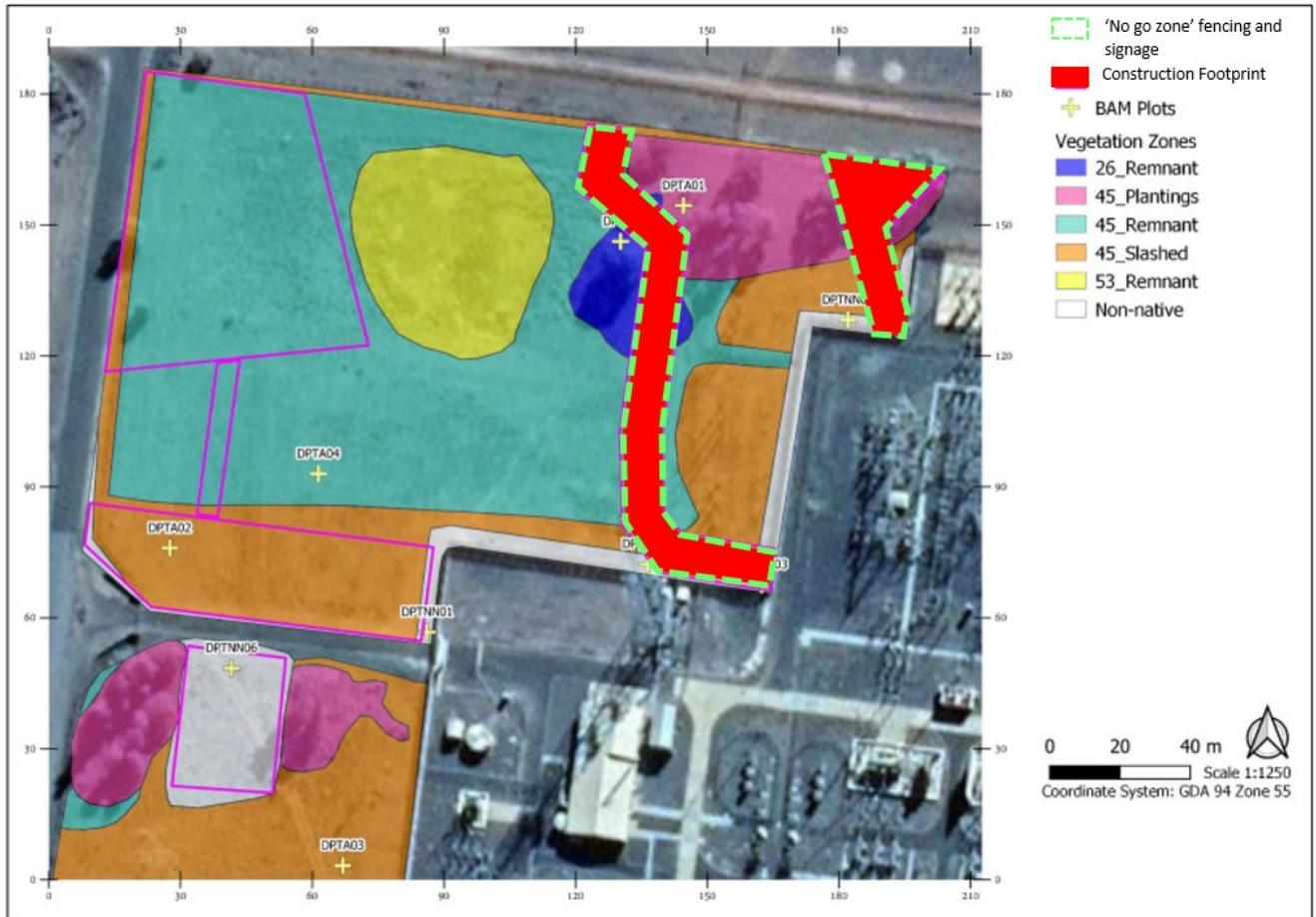


Figure 9-6: Vegetation Zones surrounding 'No go zone' Fencing and Signage Location as mapped in the Transgrid Substation Connection Biodiversity Development Assessment Report (V3.1, September 2022 (TG BDAR))

9.2.2 Lopping, Pruning and Trimming Procedure

Heavy machinery should not be used for pruning or trimming. Appropriate tools to use are loppers, chain saws and vehicle mounted saws.

Tree limbs are to be removed using the three cut method as shown below in Figure 9-7.

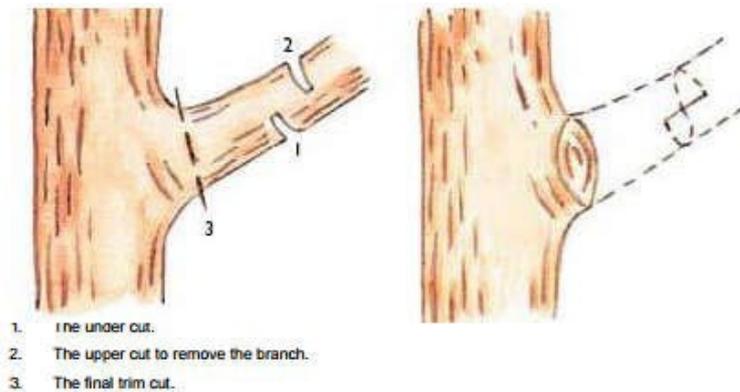


Figure 9-7: Tree cutting method

9.2.3 Hollow-bearing Tree Removal

Removal of hollow-bearing trees are not permitted. Where additional impacts to trees are proposed consult the CPP Project Manager for further advice.

9.2.4 Removal of Trees (and threatened species habitat) Outside the Approved Clearing Limits

The approved clearing limit is the line between the vegetation to be removed and the vegetation (and threatened species habitat) to be retained. It will be shown on all design plans as required. Removal of trees (and threatened species habitat) outside the approved clearing limits is not permitted. Where additional impacts to trees are proposed consult the CPP Project Manager for further advice.

9.2.5 Not Used

9.2.6 Re-use of Bush Rock

Any bush rock encountered on site is to be relocated to the edge of the disturbance area to enhance habitat. Where possible, dead wood and hollow logs should be relocated to the edge of the disturbance area to enhance habitat.

9.3 Unplanned Threatened Flora and Fauna Species Finds Procedure

The procedure in Figure 9-8 shall be used for unplanned threatened flora and fauna species finds.

As a general principle, any native animals found with the construction area should be avoided. Flora and fauna should only be handled by a qualified ecologist or wildlife carer with relevant skills and experience (e.g. snake handling), and only when absolutely necessary.

Any onsite protected fauna injured during a construction activity should be captured and a registered wildlife handler or veterinarian contacted and documented on a threatened species register (Table 9-1). Similarly, any disturbed threatened flora shall be assessed by a qualified ecologist and a suitable action plan derived by the ecologist.

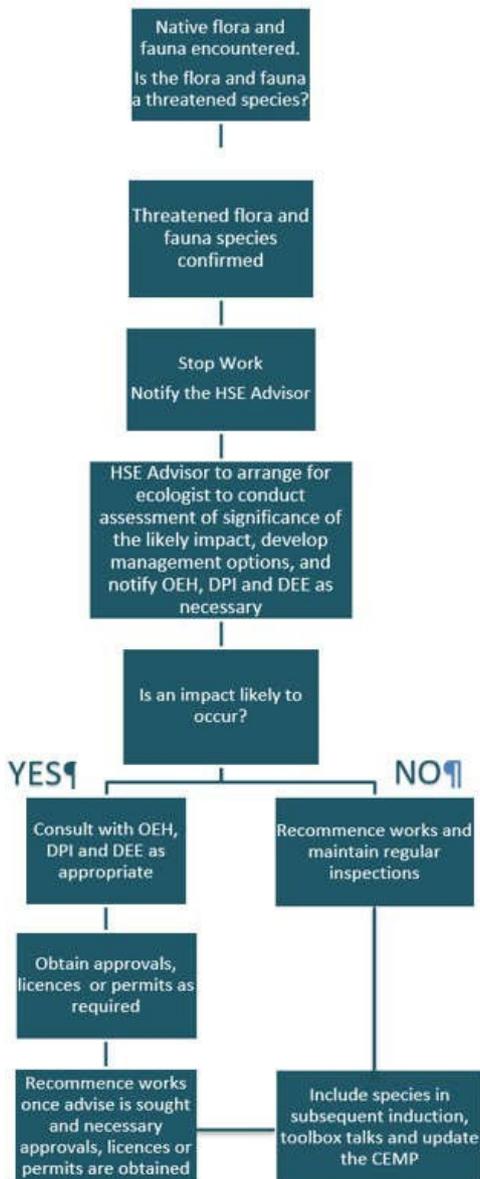


Figure 9-8: Threatened flora and fauna encounter procedure

Step 1

Remove any threat to the fauna that could cause or exacerbate an injury.

Step 2

Use appropriate equipment to capture the fauna. This may include:

9.4 Not Used

9.5 Pest and Weed Management Protocol

The Project Manager will initiate collaboration with adjoining landholders to control animal pests and exotic plant species that may traverse property boundaries. These initial communications will inform collaborative past and weed management measures into and during operation.

9.5.1 Animal Pest Management Procedure

Due to perimeter fencing around the entire Development limiting entry to the site by large mammal pests such as feral cats, foxes and rabbits, it is anticipated that most pest control activities will be limited to the control of small mammals such as rodents and invertebrates. Larger pest animals may however be present at the site early in during the construction phase and may enter the site periodically through the access off Donald Ross Drive.

9.5.1.1 Fox pest control (NSW Department of Primary Industries)

Reducing the impact of the red fox relies on a mixture of control techniques comprising poison baiting, shooting, trapping, fencing and guard animals. All these techniques have a short-term effect on local fox numbers. No single control method will be successful on its own and when foxes are removed from an area, reinvasion or immigration from existing untreated areas generally occurs within 2 to 6 weeks.

Control methods can be accessed from <http://www.dpi.nsw.gov.au/biosecurity/vertebrate-pests/pest-animals-in-nsw/foxes/fox-control>

9.5.1.2 Rabbit pest control

The European rabbit is declared a noxious animal in NSW. Landholders are obliged to control rabbit populations on their land. The aim of control is to reduce the impact of rabbits on farm enterprises and the natural environment. The success of rabbit control should be determined more by how many rabbits remain than by how many rabbits have been removed. Rabbits have the ability to rapidly re-invade and recolonise areas following control, so control programs should involve as large a number of properties as possible. Set clear, attainable objectives for control work, taking account of available financial and physical resources.

Two broad rabbit control strategies are applied to rural land in NSW: the combination of poisons and harbour destruction in eastern areas with cooler climates, and extensive harbour destruction where ground conditions are suitable in western areas. There are three Stages of rabbit control:

- Stage 1- Initial reduction.
- Stage 2- Follow up control.
- Stage 3 Advanced control.

Control methods include:

- Monitoring of population density prior to deciding a control method.
- Poisons.
- Harbour destruction.
- Fumigation.
- Shooting.
- Trapping.

Further details regarding control methods can be accessed from:

<http://www.dpi.nsw.gov.au/biosecurity/vertebrate-pests/pest-animals-in-nsw/rabbits/rabbit-control>.

9.5.1.3 Feral cat control

Feral cat control can be achieved by applying fox control techniques. Further information can be accessed from: <http://www.environment.gov.au/biodiversity/threatened/publications/factsheet-tackling-feral-cats>.

9.5.1.4 Pesticide application record

Pesticide application will only be administered by authorised personnel with ChemCert accreditation – AQF 3 in accordance with SafeWork requirements.

Pesticides will only be applied in accordance with label instructions for that product.

A Pesticide Application Record (Figure 9-9) will be completed and public notifications made in accordance with relevant legislation, where pesticides are to be used in areas that could be accessed by members of the public.

Only pesticides registered for use near water may be used near any waterways.

Pesticide Application Record Sheet



Industry &
Investment

Location, Applicator, Date of Application

Property/Holding: (residential address)				Date:										
Applicator's Full Name:			Owner (if not applicator):											
Address:			Address:											
		Phone:		Phone:										
Mobile:	Fax:	Email:	Mobile:	Fax:	Email:									
Sensitive Areas (including distances, buffers):			Comments (including risk control measures for sensitive areas):											
<table border="1" style="margin: auto;"> <tr><td></td><td>N</td><td></td></tr> <tr><td>W</td><td>Treated Area</td><td>E</td></tr> <tr><td></td><td>S</td><td></td></tr> </table>				N		W	Treated Area	E		S				
	N													
W	Treated Area	E												
	S													

Host/Pest

Paddock Number/Name:	Paddock Area:	Order of Paddocks Sprayed:
Crop/Situation:	Type of Animals:	
Crop/Pasture Variety:	Age/Growth Stage:	
Growth Stage:	Mob/Paddock/Sheed:	
Pest/Disease/Weed:	Animals — Number Treated:	
Pest Density/Incidence: Heavy <input type="checkbox"/> Medium <input type="checkbox"/> Light <input type="checkbox"/>		

Application Data

Full Label Product Name:		Rate/Dose:	Water Rate L/ha:
Permit No.:	Expiry Date:	Additives/Wetters:	
Total L or kg:	WHP:	ESI*:	Date Suitable for Sale:
Equipment Type:	Nozzle Type:	Nozzle Angle:	Pressure:
Date Last Calibrated:	Water Quality (pH or description):		

Weather

Showers <input type="checkbox"/> Overcast <input type="checkbox"/> Light Cloud <input type="checkbox"/> Clear Sky <input type="checkbox"/>					
Rainfall (24 hours before and after)					
Before:	mm	During:	mm	After:	mm
Time (show time in this column)	Temperature °C	Relative Humidity (%)	Wind Speed	Direction	Variability (e.g. gusting)
Start					
Finish					
Comments:					

* When using herbicides in mixtures with fungicides and insecticides, an ESI may apply to the non-herbicide component of the mixture.

Figure 9-9: Pesticide Application Record sheet

9.5.2 Weed Management Procedure

High threat exotic plant cover in this BMP are defined under the Biodiversity Assessment Method 2020 (BAM 2020) as “plant cover composed of vascular plants not native to Australia that if not controlled will invade and outcompete native plant species. Also referred to as high threat weeds.” Low threat exotic plant cover is defined in this BMP as all other exotic plants cover that does not typically outcompete native plant species.

According to the TG BDAR, 20 species of exotic plant (including three listed as High-threat Exotic species) were recorded within the BESS Stage 2b(ii) Development area. Of those exotic plants, no Weeds of National Significance or Priority Weeds for the region were recorded during the assessment.

Three of the recorded exotic species are listed as High Threat Exotic (HTE) species under the BAM:

- Khaki Weed (*Alternanthera pungens*) – see *Figure 9-10*



Figure 9-10: Khaki Weed (Alternanthera pungens)

- Paspalum (*Paspalum dilatatum*) – see *Figure 9-11*



Figure 9-11: *Paspalum* (*Paspalum dilatatum*)

- Bathurst Burr (*Xanthium spinosum*) – see Figure 9-12



Figure 9-12: *Bathurst Burr* (*Xanthium spinosum*)

The location of plots within the vicinity of the BESS Stage 2b(ii) works are detailed in the Figure 9-13.

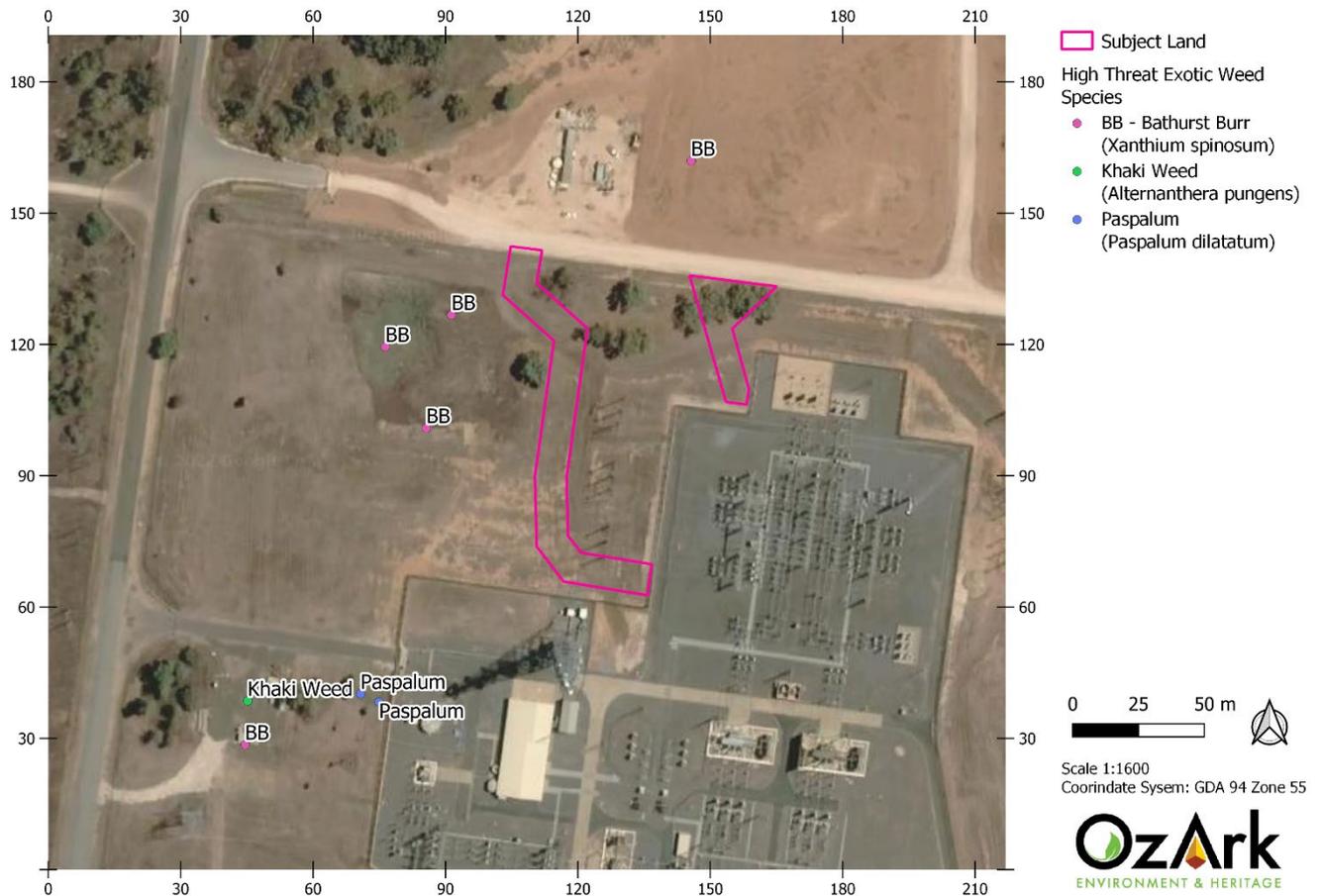


Figure 9-13: High Threat Exotic Weed Species Plots

There may be some potential for activities during the BESS Stage 2b(ii) of the Development to spread weeds through the movements of heavy machinery and light vehicles, though movements are heavily restricted to a small and defined construction footprint. Should weeds be detected during construction of the BESS Stage 2b(ii) of the Development the Weed Management Procedure will be implemented.

A detailed weed management procedure is provided in Section 9.5.2.3.

9.5.2.1 Invasive weeds

The BMP lists the implementation of weed control measures to ensure invasive weed problems are not exacerbated. Weeds will be classified with reference to NSW WeedWise profiles. Once weeds are identified within the construction area, they should be marked up on relevant drawings.

9.5.2.2 Weed inspection

The HSE Advisor will inspect the project area for weeds as required:

- Prior to clearing and grubbing. A *Pre-Clearance Assessment Survey* will be utilised to document this assessment. A Weed Dilapidation Report shall be completed by qualified ecologist prior to commencement of construction.
- Weekly during construction to identify high and low threat exotic plants before they go to flower and seed.
- Monthly over the first 12 months post construction (to be managed by the O&M contractor).
- When a potential weed infestation has been identified.

Exotic plant cover will be mapped with GPS following inspections including noting the specie(s) degree of infestation and capturing an image for monitoring purposes.

9.5.2.3 Weed Management

The Project / Site Manager will ensure that the below mitigation strategies are implemented in Table 9-2.

Table 9-2: Weed Management Procedure

No.	Control measure	Responsibility	Timing
Pre-clearance			
1	Ensure weeds are positively identified and clearly demarcated in the field.	Supervisor/Environmental Advisor	Prior to clearing
2	Identified stockpile locations for weeds, non-weed vegetation, weed topsoil, and weed-free topsoil.	Supervisor/Environmental Advisor	Prior to clearing
4	Complete Pre-clearance Checklist and Dilapidation Report	Supervisor/Environmental Advisor	Prior to clearing
5	Clearing and stripping should be avoided in wet and windy condition	Supervisor/Environmental Advisor	Prior to clearing
6	Control access and egress onto sites, set-up inspection areas at allocated entry/egress points as required.	Supervisor/Environmental Advisor	Prior to clearing
7	Ensure vehicles, machinery, equipment and footwear are cleaned and free of mud, soil and plant material.	All	Prior to clearing

No.	Control measure	Responsibility	Timing
8	Set up “No Go Zones”	Supervisor/Environmental Advisor	Prior to clearing
9	If identified weeds need to be eradicated, this should be done by an approved weed contractor Only employees or contractors holding current licenses/approvals shall apply herbicides and pesticides	Supervisor/Environmental Advisor	Prior to clearing
10	Herbicide and pesticides must be applied based on the manufacturer’s recommendation and label specifications at the most appropriate time of year for that weed species	Supervisor/Environmental Advisor	Prior to clearing
During Clearing			
11	Clear non weed-infested/non disease areas first. Clear weed-infested/ non disease areas last	All Personnel	During clearing
12	Watch for new plants and control HTE’s as soon as it appears. Minimise soil disturbance when clearing.	All Personnel	During clearing
13	Ensure that all vehicle and equipment movement is kept within designated disturbance areas. Do not enter ‘No-go’ zones	All Personnel	During clearing
14	Undertake visual inspections to confirm that vehicles, plant and equipment and footwear are free of clods of soil, slurry (water and soil mixture) and plant material.	All Personnel	During/post clearing
15	Excavated topsoil material that is likely to be infested with weeds/seeds is to be removed from the site and disposed of at an appropriately licensed waste disposal facility	All Personnel	During/post clearing
16	All imported material will be certified weed and pathogen free	All Personnel	During/post clearing
Training			
17	Employees and subcontractors must trained in the identification of weeds specifically the HTE’s relevant to their work sites and appropriate clean down procedures	Environmental Advisor	Ongoing
18	Raise awareness of the importance of controlling weeds and their role in preventing its spread.	Environmental Advisor	Ongoing
Clean Down Requirements			

No.	Control measure	Responsibility	Timing
19	<p>All vehicles, plant and machinery entering and leaving sites with weed infestations must be cleaned and free of weeds and pathogens</p> <p>Particular attention should be paid to the radiator, wheel wells, tyres, bumpers and undercarriage on the exterior and the carpets, floor mats and seats within the cab.</p>	All Personnel	Post clearing
20	Complete Weed/disease Inspection and clean down checklist	All Personnel	Post clearing
Visual Inspection			
21	<p>A visual inspection of vehicles, plant and equipment shall be undertaken and shall include the following;</p> <p>The radiator, wheel wells, tyres, bumpers and undercarriage on the exterior and the carpets, floor mats and seats within the cab</p> <p>A wash down bay will not be available on site. All plant, equipment and vehicles are to be cleaned down prior to arrival at site. If during the course of an inspection weed / seed contaminants are identified the equipment or plant will be prohibited from entering site.</p>	All Personnel	Ongoing
Weed Surveys			
22	Survey of disturbed areas for weed coverage will be conducted weekly during construction and monthly for 12 months post construction.	Supervisor/Environmental Advisor	Ongoing
Records			
23	<p>Records shall be kept and maintained for the following;</p> <ul style="list-style-type: none"> Any pesticides/herbicides used Vehicle Clean Down Checklists Properties with significant weed infestations and/or plant/animal diseases Any requirements of landowners regarding access or weed/disease control techniques 	Supervisor/Environmental Advisor	Ongoing

9.5.2.4 Weed treatment

A general guide to weed control and management is presented above. More detailed information, including herbicide types and application rates, can be sought from the project Ecologist or from the WeedWise website (<http://weeds.dpi.nsw.gov.au/>).

9.5.2.5 Herbicide application record

Herbicide application will only be administered by authorised personnel with ChemCert accreditation – AQF 3 in accordance with SafeWork requirements.

Herbicides will only be applied in accordance label instructions for that product.

A Herbicide Application Record (Figure 9-14) will be completed and public notifications made in accordance with relevant legislation, where herbicides are to be used in areas that could be accessed by members of the public.

Only herbicides registered for use near water may be used near any waterways.



Location, Applicator, Date of Application

Property/Holding: (residential address)				Date:										
Applicator's Full Name:			Owner (if not applicator):											
Address:			Address:											
Phone:			Phone:											
Mobile:	Fax:	Email:	Mobile:	Fax:	Email:									
Sensitive Areas (including distances, buffers):			Comments (including risk control measures for sensitive areas):											
<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <td>N</td> <td></td> </tr> <tr> <td>W</td> <td>Treated Area</td> <td>E</td> </tr> <tr> <td></td> <td>S</td> <td></td> </tr> </table>				N		W	Treated Area	E		S				
	N													
W	Treated Area	E												
	S													

Host/Pest

Paddock Number/Name:	Paddock Area:	Order of Paddocks Sprayed:
Crop/Situation:	Type of Animals:	
Crop/Pasture Variety:	Age/Growth Stage:	
Growth Stage:	Mob/Paddock/Shed:	
Pest/Disease/Weed:	Animals — Number Treated:	
	Pest Density/Incidence: Heavy <input type="checkbox"/> Medium <input type="checkbox"/> Light <input type="checkbox"/>	

Application Data

Full Label Product Name:		Rate/Dose:	Water Rate L/ha:
Permit No.:	Expiry Date:	Additives/Wetters:	
Total L or kg:	WHP:	ESI*:	Date Suitable for Sale:
Equipment Type:	Nozzle Type:	Nozzle Angle:	Pressure:
Date Last Calibrated:	Water Quality (pH or description):		

Weather

Showers <input type="checkbox"/> Overcast <input type="checkbox"/> Light Cloud <input type="checkbox"/> Clear Sky <input type="checkbox"/>					
Rainfall (24 hours before and after)					
Before:	mm	During:	mm	After:	mm
Time (show time in this column)	Temperature °C	Relative Humidity (%)	Wind Speed	Direction	Variability (e.g. gusting)
Start					
Finish					
Comments:					

*When using herbicides in mixtures with fungicides and insecticides, an ESI may apply to the non-herbicide component of the mixture.

Figure 9-14: Herbicide application record sheet

9.5.2.6 Follow-up inspection

The HSE Advisor will ensure that a follow-up inspection is undertaken of identified exotic plant cover to ensure treatment was successful.

Where high threat exotic plants cannot be effectively destroyed prior to topsoil stripping, weed contaminated topsoil will be isolated and disposed of at an approved offsite licensed facility as directed by the HSE Advisor.

9.5.2.7 Ongoing management & monitoring

Monitoring of exotic plant cover will occur as part of the routine weekly inspections during construction to determine effectiveness of management controls. The presence of any exotic plant cover and the necessary management actions will be noted on the regular CPP Environmental Inspection Checklist (refer to CEMP).

9.6 Traffic Management Procedure

9.6.1 Vehicle, Plant & Equipment Movement

All plant and vehicles entering the development site will arrive on site clean and free from mud, weeds etc. Prior to departure from site all soil and organic matter from tyres and undercarriages must be removed.

All mobile plant required will be inspected prior to entering and leaving site using this project using the CPP Mobile Plant Inspection Form shown in Figure 9-15 and documented on the vehicle hygiene register (Figure 9-16).

Figure 9-15 Mobile plant inspection form

Mobile Plant Inspection



Project Name:		Project No.:		Date of Inspection:	Click or tap to enter a date.
Name:		Signature:		Service Records Available:	
Plant Type:		Plant Make:		Registration Number:	
Company:		Plant No.:		Date Last Serviced:	Click or tap to enter a date.

Condition Codes: A = Acceptable, R = Repairs Required, D = Defective, N = Not Applicable

NOTE: Checked Items Found to be Defective (D) Are NOT to be Operated Until Rectified and Permission is Given by Site Manager
Items Marked with (*) are Minimum Requirements

Items	A	R	D	N	Comments	Items	A	R	D	N	Comments
Safety						General					
Fire Extinguisher *						Tyre / Track Conditions					
Service Brakes *						Attachments Secure					
Park Brake *						Hydraulic Leaks					
Seat Belts and Seat *						Oil Leaks					
Reverse Alarm *						Coolant Leaks					
Beacon *						Broken / Damaged Parts					
Horn *						ROPS Fitted					
Risk Assessment *						FOPS Fitted					
Pre-Start Book *						Damage to Cabin					

Mobile Plant Inspection



Items	A	R	D	N	Comments	Items	A	R	D	N	Comments
Safety						General					
SOP / Operators Manual *						Rubbish In Cabin					
Lights *						Windows Clean					
Machine Guards *						Lockable Reservoir Caps					
Wipers *						Vandal Covers					
UHF Radio fitted						Controls / Switches					
E Stop						Hoses / Fittings					
First Aid Kit						Electrical Test / Tag					
Fit for Purpose						Rigging Equipment Tagged					
SWL Displayed						Maintenance Sticker Visible					
Load Chart Fitted						Maintenance in date					
Quick Hitch											

Mobile Plant Inspection



WEED & SEED HYGIENE CERTIFICATE				
Condition Codes: A = Acceptable, C = Contaminated, N = Not Applicable				
NOTE: Mobile Plant Found to be Contaminated (C) Is NOT Approved to be unloaded on site, Mobile Plant Not Permitted on site until Issue Rectified and Permission is Given by Site Manager				
Check the following areas for any sign of weeds, seed or propagules	A	C	N	Comments
Earthmoving Equipment				
Hollow Section Chassis Channels				
Turret Pivot Area				
Channels for Hydraulic Hoses				
Counterweight Void Spaces				
Engine Bay Floor				
Fan Shroud and Radiator Core				
Air Filters				
Toolbox				
Arms / Booms				
Bucket Blade				
Rear Blade				
Tracks / Tyres				
Cars, Trucks and 4WD				
Interior of Vehicle				
Tray				
Engine Bay				
Underside of Vehicle				
Toolbox / Storage Compartments				
Wheel Arches				
Verification	Yes	No		
Is Wash Down Required				
Was Vehicle Washed Down – If Yes include date in comments				

Table 9-3 Vehicle clean down matrix

		Dense infestations – contact with weeds unavoidable	Large number of scattered plants or clumps of weeds that can be driven or walked around – contact probable	Small patches of weeds or individual plants – easily avoided – contact with weeds feasible
Operator Actions	RISK	HIGH	MEDIUM	LOW
Drove off-road through vegetation, worked in muddy/ wet conditions / worked among plants where seeds visibly present	HIGH	FULL CLEAN	FULL CLEAN	WASH DOWN
Drove on un-improved roads, pulled onto shoulder, had contact with vegetation either on-foot or with vehicle	MED	FULL CLEAN	WASH DOWN	WASH DOWN
Travelled on improved roads only, did not walk off designated path	LOW	VISUAL INSPECTION	VISUAL INSPECTION	VISUAL INSPECTION

The following techniques should be performed at a designated vehicle clean down station prior to entering a protected site for the first time or when moving from one infested area to another. Cleaning only to occur in Approved Wash/brush down areas close to infected areas to reduce spreading infected material.

9.7 Not Used

9.8 Rehabilitation Protocol

Areas temporarily disturbed for the BESS Stage 2b(ii) will need to be rehabilitated and revegetated as soon as practicable. The aim of the rehabilitation and revegetation is to stabilise the disturbed area and to return it to a condition that is similar to its pre-disturbance state.

9.8.1 Topsoiling

At commencement of construction works topsoil will be stripped from the area. This topsoil will be replaced with site won topsoil on all areas from where it has been removed. If additional topsoil is required, any imported materials such as straw, mulch, topsoil or gravel must be certified free of weeds and pathogens. Prior to the application of topsoil, compacted areas will be tined or ripped to a depth of 150 mm to loosen the surface. Over the tined surfaces will be placed at least 100mm of topsoil. Ensure the topsoil is free of large rocks and sticks. Harrow the topsoil prior to sowing seed if the surface has set hard following rain.

Due to the climatic conditions (evaporation rates) native grassland establishment is best attempted over late autumn, winter or early spring. Wet summers are also able to maintain established perennial pasture growth in summer active species. Summer rainfall is less reliable than summer evaporation and as such revegetation is also less reliable. As such rehabilitation and revegetation should commence in late summer/early autumn as temperatures decrease and evaporation rates fall.

9.8.2 Not Used

9.8.3 Grass sowing rate

The recommended seeding rate and mix will be proposed by a suitably trained contractor. Care should be taken to ensure sufficient plant densities.

Binders and fertiliser must not be used within or adjacent to native vegetation.

Re-seeding in areas that were previously, or are adjacent to, native vegetation (including areas without trees) must be with native species that are part of the mapped plant community type (PCT).