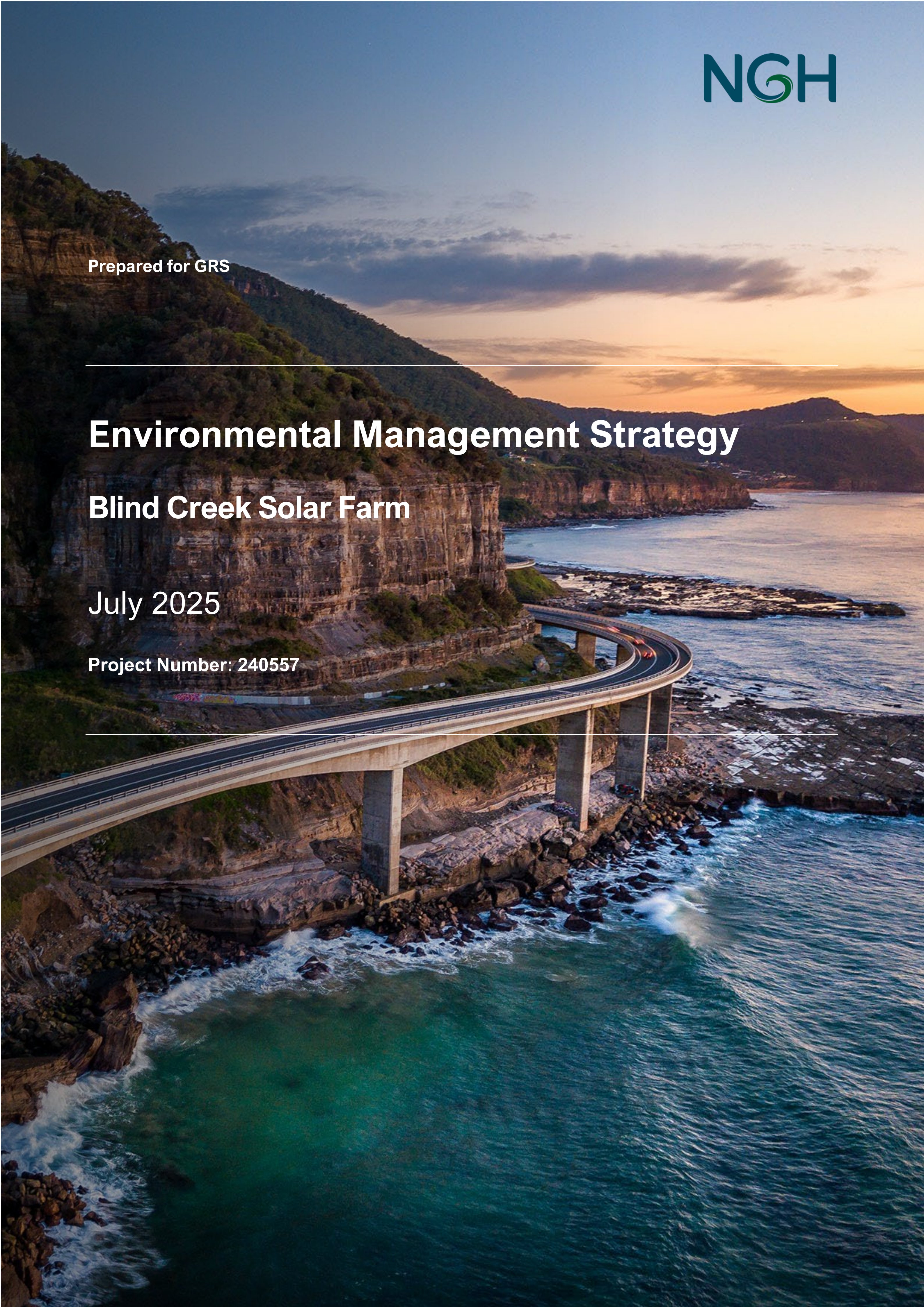

Prepared for GRS

Environmental Management Strategy

Blind Creek Solar Farm

July 2025

Project Number: 240557

Document verification

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We acknowledge the traditional owners of this land and pay our respect to Elders past, present and emerging. We recognise that the First Nations peoples of Australia have traditionally managed the resources of this land in a sustainable way, and that they are the original custodians of the Australian environment.

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Acronyms and abbreviations

AC	Alternating current
AES	Accommodation and Employment Strategy
APZ	Asset Protection Zone
BC Act	*Biodiversity Conservation Act 2016* (NSW)
BCS	Biodiversity, Conservation and Science Directorate
BCSF Pty Ltd	Blind Creek Solar Farm Pty Ltd
BESS	Battery Energy Storage System
Biosecurity Act	*Biosecurity Act 2015* (NSW)
BMP	Biodiversity Management Plan
CCTV	Closed-circuit television
CEMP	Construction Environmental Management Plan
CMS	Construction Method Statements
CoA	Conditions of Approval
Cwth	Commonwealth
DC	Direct current
DEMP	Decommissioning Environmental Management Plan
DPE	(Former) Department of Planning and Environment (NSW) (now DCCEEW and DPHI)
DPHI	Department of Planning, Housing and Infrastructure (NSW) (formerly DPE)
EEC	Endangered Ecological Communities
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	Environmental Planning and Assessment Regulation *2021*

EPA	Environment Protection Authority
EPC	Engineering, Procurement and Construction
ESCP	Erosion and Sediment Control Plan
ERP	Emergency Response Plan
EWMS	Environmental Work Method Statements
FM Act	*Fisheries Management Act 1994* (NSW)
FRNSW	Fire Rescue NSW
FSS	Fire Safety Study
FTE	Full time equivalent
GRS	Gransolar
Ha	Hectares
HMP	Heritage Management Plan
HSE	Health Safety Environment
km	kilometres
kV	Kilovolts
LGA	Local Government Area
m	metres
ML	Megalitre
MW	Megawatt
MWh	Megawatt hours
NSW	New South Wales
OI	Octopus Investments
O&M	Operation and Maintenance
OEMP	Operational Environmental Management Plan
PCUs	Power Conversion Units

PCT	Plant Community Type
POEO Act	*Protection of the Environment Operations Act 1997*
PV	Photovoltaic
QPRC	Queanbeyan Palerang Regional Council
RFS	Rural Fire Service
SAP	Sensitive Area Plans
SISD	Safe Intersection Sight Distance
SSD	State Significant Development
SWMP	Soil and Water Management Plan
SWMS	Safe Work Method Statements
TfNSW	Transport for NSW
TMP	Traffic Management Plan

1. Introduction

1.1. Background

Blind Creek Solar Farm Pty Ltd (BCSF Pty Ltd) (the Proponent) have approval for construction, operation and decommissioning of a 350 Megawatt (MW) alternating current (AC) / 420 MW direct current (DC), photovoltaic (PV) energy generation facility referred to Blind Creek Solar Farm (the Project). The Project is located 30 kilometres (km) northeast of Queanbeyan and 7 km north of Bungendore, New South Wales (NSW), on the shores of Lake George.

The Project was assessed in an Environmental Impact Statement (EIS) in accordance with Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and Schedule 2 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). It is considered State Significant Development (SSD).

In response to submissions made during exhibition of the EIS, a Submissions Report and Amendment Report was prepared by NGH (2022). The submissions resulted in changes to the EIS proposal and some changes in safeguards and management measures outlined in the EIS.

The Proponent received approval and Conditions of Approval (CoA) for the Project on 28 July 2023 from the Department of Planning and Environment (DPE), now referred to as Department of Planning, Housing and Infrastructure (DPHI).

The Environmental Assessment documents relevant to this Project include:

- The Project EIS (NGH, 2022b)
- The Project Submissions Report (NGH, 2022c)
- The Project Amendment Report (NGH, 2022a)
- Development Consent SSD 13166280 (determined 28 July 2023).

The environmental safeguards outlined in the Environmental Assessment documents have been incorporated into this document and associated sub-plans where relevant. The Project will be carried out generally in accordance with the EIS, the Conditions of Approval (CoA), development layout in Appendix 1 of the CoA and written directions by the Planning Secretary. The CoA and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). If there is any inconsistency between the documents the most recent document will prevail.

The BCSF Pty Ltd has engaged Gransolar (GRS) as the Engineering, Procurement and Construction (EPC) contractor to deliver the construction phase of the Project.

1.2. Purpose of this EMS

This Environmental Management Strategy (EMS) presents the framework for the environmental management for the Project. It has been prepared to outline and describe how BCSF and GRS will comply with the environmental assessment and approval during all stages of the Project.

The EMS has been prepared in accordance with:

- Environmental Assessment documents
- Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004)

- AS/NZS ISO 14001: 2016 Environmental Management systems
- Applicable Federal and State Legislation
- AS/NZS ISO 31000:2009 Risk management.

The purpose of this EMS is to provide a structured approach to the management of environmental issues during all stages of the Project. The EMS outlines the requirements, controls and management procedures that direct the Project team and provides an overall approach to the Project. The EMS provides requirements and directions regarding specific measures that contractors and suppliers need to adopt for their own work on the Project. Implementing this EMS effectively will ensure that the Project team will meet regulatory and policy requirements in a systematic manner and continually improve environmental performance.

This EMS:

- Describes the Project in detail including activities to be undertaken
- States obligations, objectives and targets for issues that are important to the environmental performance of the Project
- Identifies the approvals, licences and permits that relate to the Project
- Describes the strategic framework for environmental management of the Project
- Describes the environmental management related roles and responsibilities of personnel
- Outlines training and induction requirements for employees, contractors and sub-contractors, in relation to environmental and compliance obligations with applicable policies, approvals, licences, permits, consultation agreements and legislation
- Describes the procedures that will be implemented for community consultation and notification, and complaints management
- Includes protocols for managing and reporting incidents and non-compliances with applicable policies, approvals, licences, permits, consultation agreements and legislation
- Outlines a monitoring regime and inspection program to check the adequacy of controls as they are implemented during construction.

This EMS is the overarching document in the environmental management system for the Project that includes a number of management documents as described in Section 4.4 and will be implemented by the Applicant once approved by the Planning Secretary. It is applicable to all staff and sub-contractors associated with the Project.

This EMS will be reviewed and updated in accordance with Section 11.1. This includes review and update of the EMS prior to operation and decommissioning.

2. Project description

2.1. Project site and location

The Project is located within the Queanbeyan-Palerang Local Government Area (LGA), which has an area of 531,888 hectares (ha). The Queanbeyan-Palerang LGA is situated in the South Eastern and Tablelands region of NSW and has close economic and social ties to the ACT, which is located approximately 35 km southwest of the Project. Queanbeyan is the closest major regional centre to the Project (30 km northwest). The nearby town of Bungendore is 7 km south of the Project site. Lake George (known as Weereewa and Lake Ngungara to the Traditional Owners) is the most significant natural feature in the locality and is mapped as a wetland of National Significance. It is an ephemeral lake with its 20th century maximum extent being 21 km long, north to south, and 10 km wide, east to west. The lakebed is 674 m above sea level.

The Project is bounded by Lake George to the northwest, agriculture to the north and east and quarrying operations to the south of the site (Figure 2-1). Site access is via Tarago Road, at the interstation of a private road, known by the Landowners as Blind Creek Road. The Project would be connected to the national electricity grid via an existing 330kV transmission line which crosses the site.

The Project site is zoned RU1 Primary Production and C3 Environmental management under the Palerang Local Environmental Plan 2014. The Project is be located on the following tenures:

- Lot E DP 38379
- Lot 2 DP1154765
- Lot 1 DP237079
- Lot 1 DP1154765
- Lot 2, 3 and 4 DP 237079
- Lot 1 DP456698
- Lot 9 DP237079
- Lot 1 DP456698
- Lot 1 DP1154765.

The Project site typically slopes from east to west with elevations ranging from about 670 m Australian Height Datum (AHD) at Lake George to 720 m AHD. On its northern flank the Project site abuts a relatively steep terrain which rises to an elevation of about 870 m AHD.

The majority of the Project site consists of extensively cleared agricultural land, with a small area of remnant woodland vegetation in the eastern corner, that is associated with Plant Community Type (PCT) *1100 – Ribbon Gum – Snow Gum grassy forest on damp flats, eastern South Eastern Highlands Bioregion*. The development footprint avoids this PCT.

Several watercourses traverse the Project site including Butmarro Creek (also known as Deep Creek), Blind Creek (also known as Dry or Bridge Creek) and Wrights Creek. All three watercourses within the Development site are ephemeral and would only contain flowing water during and shortly after rainfall events. There is an unnamed wetland in the north of the Project site which is avoided by the development footprint. There are 5 dams and/or ephemeral wetlands within the Project site.

The Project site is in close proximity to Iberdrola Australia's operational Capital Wind and two industrial sites used for extractive activities:

- Bungendore Sands quarry located approximately 240 m southwest of the Project site (closest point); and
- Paragalli Sands quarry, located approximately 524 m east of the Project site (closest point).

Additionally, a small (private) airstrip is located within the Project site and is currently used by the associated landowner for recreation and aerial spraying of crops.

There are eight associated residential receivers (dwellings) and six non associated receivers within the 2 km buffer of the Project site, refer to Figure 2-2. There are an additional 23 non-associated receivers within 2 km of the study area. The closest non-associated residential receiver is 812 m south of the Blind Creek Road entrance to the Project site. The closest non-associated receiver to the infrastructure of the Blind Creek Solar Farm is approximately 1.4 km to the Battery Energy Storage system (BESS). Of the six non-associated receivers, two are sand quarries (R9 Bungendore sands and R106 Paragalli sands). Paragalli Sands is the closest non-associated receiver to the BESS.

A residential estate occurs nearby. The estate includes residences which are within 2.6 – 2.9 km from the development footprint. Of the 24 residences in the northern end of the Estate two have a potential view of the Project from the rear gardens. The other 22 residences' view is either blocked by topography or existing vegetation. Refer to Figure 2-2.

Figure 2-1 Site context and location of approved Blind Creek Solar Farm

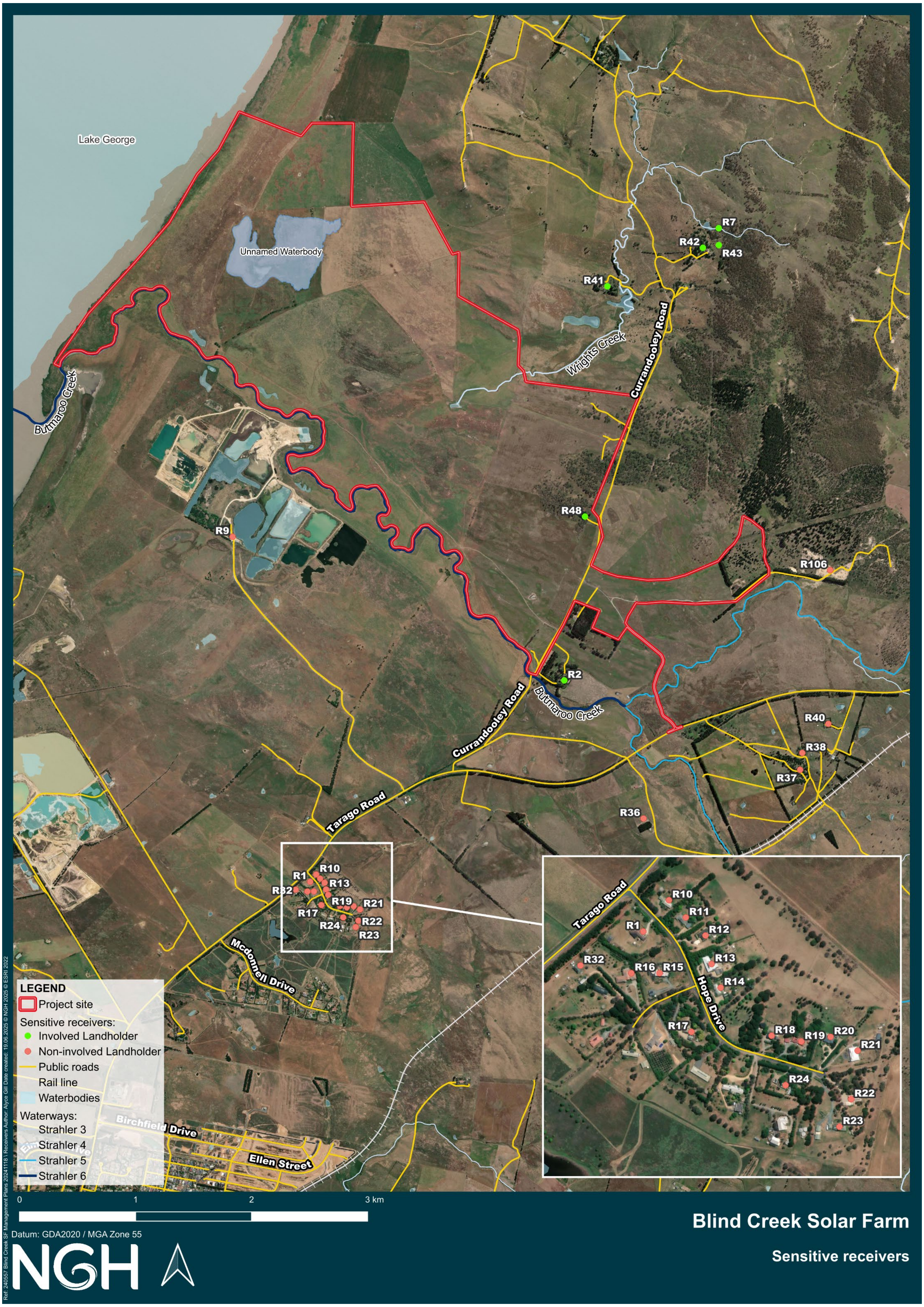

Figure 2-2 Nearby receivers

2.2. Scope of works

The Project will involve the construction and operation of a PV energy generation facility with an estimated capacity of up to 350 MWAC (420 MWDC). Of the 1,026ha Project site, the development footprint would be 682.5 ha which will be developed for the solar farm and associated infrastructure.

The Project includes the following main infrastructure components:

- Approximately 850,000 PV single axis tracking solar modules (mounted on pile-driven foundations)
- Approximately 93 inverters and transformers
- A BESS including nominally 300 MW / 486 Megawatt hours (MWh) of lithium-ion batteries with inverters
- An onsite 330 kilovolts (kV) substation connected to the existing 330 kV transmission line that passes through the site
- Underground cabling to connect solar modules, combiner boxes, Power Conversion Units (PCUs) and batteries, data services and communications
- Buildings to house a site office, switchgear, protection and control facilities, maintenance facilities, storage and staff amenities
- A communications tower for high reliability grid operations
- Internal tracks, new and upgraded sections totalling approximately 27 km
- Perimeter security fencing (if required), closed-circuit television (CCTV) and security lighting at the switching station, BESS and Operation and Maintenance (O&M) building area, only
- Stock fencing and water
- Visual amenity plantings in specific locations
- Site access intersection upgrades off Tarago Road.

During construction phase, temporary facilities would include a laydown area with secure compound, construction site offices and amenities, and car and bus parking areas for construction staff. The construction phase of the Project is expected to take approximately 18 to 24 months, and the Project would have an operational life of nominally 35 years or more.

The Project layout is provided in Figure 2-3. No native vegetation or fauna habitat will be cleared outside the approved disturbance footprint and there will be not impacts on any areas of Endangered Ecological Communities (EECs) during the construction, operations and decommissioning of the Project.

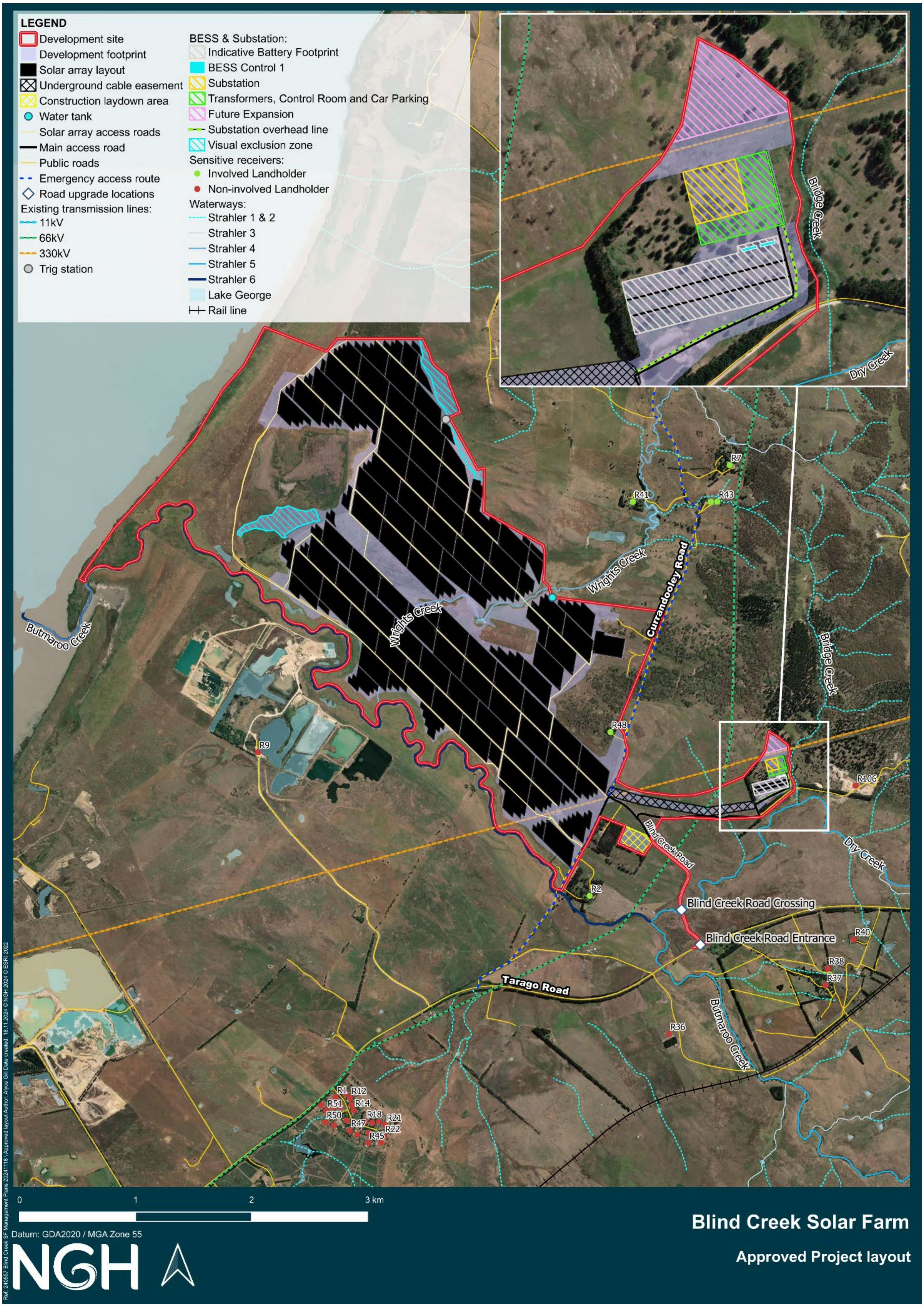

Figure 2-3 Approved Project layout

2.3. Project design and upgrades

As per Schedule 2 Condition A5 BCSF may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, BCSF must provide revised layout plans and Project details of the development to the Planning Secretary incorporating the proposed upgrades.

In accordance with Schedule 2 Condition A6, GRS must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.

2.4. Site access and road upgrades

In accordance with Schedule 2 Condition B3 of the CoA, all vehicles associated with the Project:

- Approaching from the north must travel to and from the site via the Braidwood Road, Wallace Street, Goulburn Street, Bungendore Road, Tarago Road
- Approaching from the south must travel to and from the site via Kings Highway, Molonglo Street and Tarago Road
- Approaching from the Bungendore Sewage Treatment Plant must travel to and from the site via Bungendore Road, Molonglo Street and Tarago Road.

All vehicles associated with the Project must enter and exit the site via the approved site access point off Tarago Road (refer to Figure 2-3). Other site access points may be used for emergency purposes only.

Unless the Planning Secretary agrees otherwise, prior to commencing construction, the following road upgrade treatments must be undertaken:

- Tarago Road at the site access point with Basic Left turn treatment to be sealed, designed and constructed for a 100 km/h speed environment with Safe Intersection Sight Distance (SISD)
- Extend the existing Basic Right turn treatment on Tarago Road at the site access point to comply with Figure A 28 of the *Austroads Guide to Road Design Part 4*.

Unless the relevant roads authority agrees otherwise, these upgrades must comply with the *Austroads Guide to Road Design* (as amended by TfNSW supplements) and be carried out to the satisfaction of the relevant roads authority.

2.5. Project activities and sequence

As per the definitions in the Project's Development Consent, the construction of the Blind Creek Solar Farm includes but not limited to carrying out of any earthworks on site and the construction of solar panels and any ancillary infrastructure, but excludes road upgrades or maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying. The Project activities and sequencing is provided in Table 2-1.

Table 2-1 Project activities and sequencing

Stage	Activities	Timing and staff requirements
Pre-construction	During pre-construction the following activities will be undertaken: • Undertake road dilapidation surveys for Wallace Street, Goulburn Street and Bungendore Road • Installation of site fencing • Heritage salvage in accordance with the Heritage Management Plan (HMP) • Geotechnical surveying • Soil surveys • Installation of safety markers along overhead powerlines • Implementation of the Landscaping Plan including ground preparation, weed control and planting of screening.	Approximately 6 months. Work will mostly be undertaken by contractors or specialists.
Construction Stage 1	Construction of the site access point and the road upgrades as described in Condition B5 of the Development Consent, and commencement of construction of the solar farm The main construction activities will include: • Construction of site access point on Tarago Road and Blind Creek Road • Site establishment and preparation for construction, ground preparation, levelling, construction of the internal track system, and preliminary civil works and drainage • Vegetation clearing • Laydown area preparation • Preparation of delivery station and inverter station. Continual implementation of the Landscaping Plan such as planting of screening.	It is anticipated that approximately 300 construction personnel will be required onsite during the peak construction period of approximately 18-24 months
Construction Stage 2	Continuation of on-site construction activities including transport of material using heavy vehicles requiring escort as described Condition B1 (a) (ii) of the Development Consent	

Stage	Activities	Timing and staff requirements

	The main construction activities will include:
	• Installation of steel post and framing system for the solar panels via ramming and auguring
	• Installation of PV panels and tracking modules
	• Construction of inverters and transformers
	• Construction of BESS
	• Construction of operation and maintenance building and switch room
	• Construction of the substation
	• Electrical works including:
	  ○ Solar cabling of aerials and conduits
	  ○ DC main cabling via direct burial,
	  ○ Medium voltage cabling from inverter station to delivery station through direct buried
	  ○ Module connection
	  ○ Connection of junction boxes-inverters-delivery station
	  ○ Connection to grid and finally testing and commissioning.
	• Testing/commissioning works including:
	  ○ Inter connection Substation works between GRS & Transgrid
	  ○ Site testing and commissioning of all equipment.
	• Removal of temporary construction facilities and rehabilitation of disturbed areas.
	
	This stage will involve the transport of oversize and overmass vehicles as per Condition B1 of the Development Consent	

Operation of the Solar Farm – Stage 3	Operation activities will include: • Routine visual inspections, general maintenance and cleaning operations of the solar arrays as required • Routine visual inspections, general maintenance, and cleaning operations of the substation • Routine visual inspections, general maintenance, and cleaning operations of the BESS • Vegetation management (in accordance with the Bushfire Emergency Management Plan and Landscape Management Plan). Groundcover	The solar farm will be monitored and operated by approximately 5 full time equivalent (FTE) and have a life expectancy of 35 years.

Stage	Activities	Timing and staff requirements
	vegetation will be maintained over the site to minimise erosion, dust, and weeds (subject to climatic conditions). Groundcover will be monitored and remediation (such as reseeding, soil protection or destocking) undertaken as required • Site security response (24 hr) if required • Site operational response (24 hr) if required • Replacement of equipment and infrastructure as required • Pest plant and animal control as required • Livestock movements and agricultural operations, such as fertiliser spreading.	
Decommissioning – Stage 4	At the end of its operational life, the solar farm will be decommissioned. Key elements of decommissioning will include: • The solar arrays will be removed, including the foundation posts. Materials will be sorted and packaged for removal from the site • Removal of all site amenities and equipment, including buildings, PCUs and all footings • Removal of all cabling, where practical. All low voltage cables would be removed. High voltage cabling, which is typically installed deeper than 500 mm below the ground, may be left in place • Some fencing would be removed. The removal of fences would be coordinated with the landowner and their preference • Rehabilitation of disturbed surfaces, in consultation with the landowner.	Approximately 9 months

2.6. Project program

An indicative timeline for the Project is outlined in Table 2-2. It is expected that the solar farm will be commissioned at the end of the construction period, which is anticipated to take 14-18 months.

Table 2-2 Indicative timeline

Phase	Approximate commencement	Approximate duration
Construction	Q3 2025	18-24 months
Operation	Q3 2027	35 years or more
Decommissioning	Q3 2062	9 months

2.7. Project hours

As per Condition B15 of the development consent and unless the Planning Secretary agrees otherwise, the road upgrades, construction, upgrading or decommissioning activities may only be undertaken between:

- 7.00 am - 6.00 pm Monday to Friday
- 8.00 am - 1.00 pm on Saturdays.
- At no time on Sundays or NSW Public Holidays.

The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:

- The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons
- Emergency work to avoid the loss of life, property and/or material harm to the environment.

3. Planning

3.1. Legal and other requirements

A register of legal and other requirements for the Project is contained in Appendix B. This register will be maintained as a checklist. This register will be reviewed at regular intervals e.g. during management reviews and updated with any applicable changes. Any changes made to the legal requirements register will be communicated by the GRS's Site Environmental Manager or delegate to the wider team where necessary through toolbox talks, specific training and other methods, detailed in Section 7 of this EMS.

3.2. Conditions of approval

The CoA relevant to this EMS are outlined in Table 3-1. The full list of CoA and mitigation measures from the Environmental Assessment documents are identified in Appendix A, along with where the conditions and measures have been addressed.

Table 3-1 Conditions of Approval relevant to this Plan

Condition	Requirement	Where addressed
PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING		
Environmental Management Strategy		
C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	
	(a) Provide the strategic framework for environmental management of the development;	This plan
	(b) Identify the statutory approvals that apply to the development;	Section 1.1 and 3.3 of this EMS
	(c) Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 4.8 of this EMS
	(d) Set out the procedures that would be implemented to: (i) Keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Section 4.2 and 8.2.2 of this EMS
	(ii) Receive, handle, respond to, and record complaints;	Section 8.3 of this EMS

Condition	Requirement	Where addressed
	(iii) Resolve any disputes that may arise;	Section 8.4 of this EMS
	(iv) Respond to any non-compliance;	Section 9.3 of this EMS
	(v) Respond to emergencies; and	Section 9.2 of this EMS
	(e) Include: (i) References to any strategies, plans and programs approved under the conditions of this consent; and	Section 4.4 of this EMS
	(ii) A clear plan depicting all the monitoring to be carried out in relation to the development including a table summarising all the monitoring and reporting obligations under the conditions of this consent.	Section 10.2 of this EMS
	Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	
Revision of Strategies, Plans and Programs		
C2	The Applicant must: (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 (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: (i) Submission of an incident report under condition C10 of Schedule 4; (ii) Submission of an audit report under condition C14 of Schedule 4; or (iii) Any modification to the conditions of this consent.	Section 11.1 of this EMS
Staging, combining and Updating Strategies, Plans or Programs		
C3	With the approval of the Planning Secretary, the Applicant may: (a) Prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is	Section 11.1 of this EMS

Condition	Requirement	Where addressed
	provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) Combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) Update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	
C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Section 11.1of this EMS
C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Section 11.1of this EMS
C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Section 11.1 of this EMS
Notifications		
Notification Of Department		
C7	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to	Section 8.2.1 of this EMS

Condition	Requirement	Where addressed
	commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	
Incident Notification		
C10	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 6.	Section 10.4.1 of this EMS
Non-Compliance Notification		
C11	The Department must be notified via the Major Projects website portal within seven days after the Applicant becomes aware of any non-compliance.	Section 10.4.2 of this EMS
C12	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.	Section 10.4.2 of this EMS
C13	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Section 10.4.2 of this EMS
Independent Environmental Audit		
C14	Independent Audits of the development 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 10.3.2 of this EMS
C15	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 10.3.2 of this EMS

Condition	Requirement	Where addressed
C16	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition C14 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant at the date upon which the audit must be commenced.	Section 10.3.2 of this EMS
C17	In accordance with the specific requirements in *the Independent Audit Post Approval Requirements* (2020), the Applicant must: (a) Review and respond to each Independent Audit Report prepared under condition C14 of Schedule 4 of this consent, or condition C16 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 10.3.2 of this EMS
C18	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 Independent Audit Post Approval Requirements (2020) unless otherwise agreed by the Planning Secretary.	Section 10.3.2 of this EMS
C19	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), 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 10.3.2 of this EMS
Access to Information		
C20	The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: i. the EIS ii. the final layout plans for the development iii. current statutory approvals for the development iv. approved strategies, plans or programs required under the conditions of this consent	Section 12.3 of this EMS

Condition	Requirement	Where addressed
	v. the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged vi. a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent vii. how complaints about he development can be made viii. any independent environmental audit, and the Applicant's response to the recommendations in any audit; and ix. any other matter required by the Planning Secretary; and (b) keep this information up to date.	

3.3. Approvals, permits, licensing and agreements

The Project requires the following permits and licences:

- Oversize Overmass Permit
  An oversize overmass permit will be required from the relevant road authority (Council and/or TfNSW) for any oversized vehicles
- *Roads Act 1993*, Section 138
  Any works to public or classified roads require consent under this act from the road authority. Queanbeyan-Palerang Regional Council is the roads authority for public roads with the LGA

If required, necessary water licences will be secured prior to commencement of construction.

Should any additional environmental or planning approvals, permits or licences be required the following procedure will be implemented:

- Approval, licence or permit need is identified, GRS Project Manager will notify BCSF (if applicable)
- GRS or BCSF Project Manager will identify impacts to the Project in relation to the approval (e.g., stop work)
- GRS or BCSF Project Manager will complete the necessary work to apply for the approval, licence or permit
- If changes are necessary to the EMS, the procedure in Section 11 will be followed.

4. Environmental Management System

4.1. Environmental Policy

Construction will be undertaken under GRS's Environmental Policy. This policy describes GRS's commitment to managing their environmental and community impact and deliver sustainable development and investment outcomes.

This policy will be displayed at the site office and communicated to staff and other interested parties via induction and ongoing awareness programs.

A copy of GRS's Environmental Policy is provided as Appendix C of this EMS.

4.2. Objectives and targets

As a means of assessing environmental performance over the life of the Project, environmental objectives and targets have been established. These objectives and targets have been developed with consideration of key issues identified through the environmental assessment and risk assessment process. The objectives and targets are consistent with the Project Environmental Policy and will assist in monitoring whether the commitments of the policy are being met.

The targets are incorporated into relevant environmental management sub-plans.

The performance of the Project against the objectives and targets will be documented in the Project compliance reports and at least on an annual basis as part of the management review.

Environmental objectives and targets for the Project are provided in Table 4-1.

Table 4-1 Environmental objectives and targets

Objective	Target	Measurement Tool
Construction of the Project in accordance with environmental approvals.	• Compliance with statutory approvals.	Audits, site inspections, construction compliance reporting, management review.
Construction of the Project in accordance with approved environmental management plans.	• Compliance with EMS and associated Sub-plans • Compliance with relevant environmental procedures.	Audits, site inspections, construction compliance reporting, management review.
Compliance with all legal requirements.	• No regulatory infringements (PINs or prosecutions) • No formal regulatory warning.	Audits, site inspections, construction compliance reporting, management review (construction and operation).

Objective	Target	Measurement Tool
Implement rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001.	• Address non-compliances and corrective actions within specific timeframes.	Audits, management review (complaints/corrective actions register).
Engage with the affected and broader community, minimise complaints and respond to any complaints within a suitable timeframe	• Disseminate regular Project updates and other information through the Project website and other tools identified in the Project's Community and Stakeholder Engagement Plan • Record and respond to complaints in accordance with timeframes specified in the Community and Stakeholder Engagement Plan.	Review complaints register, construction compliance report, audits
Continuously improve environmental performance.	• Develop and maintain a program of ongoing environmental training • Capture lessons learnt from environmental incidents to minimise repeat issues • Encourage and reward innovation and effort throughout the works force.	Construction compliance report, training, management review, construction and operational audits.

4.3. Environmental management system

The EMS provides the overall framework, system and procedures to ensure the potential for environmental impacts is minimised and legislative requirements are fulfilled for the Project. The system and procedures in this EMS have been developed with consideration of the environmental assessment documents and all relevant licences, permits and approvals for the Project. It identifies all requirements applicable to activities described in Section 2. This EMS establishes the system for implementation, monitoring and continuous improvement to minimise impacts from the Project on the environment.

4.4. Environmental management sub-plans and strategy

The EMS and sub-plan documents are prepared to identify requirements and processes applicable to specific impacts or aspects of the activities described in Section 2. They address the measures identified in the environmental assessment documentation and Project Approval.

The sub-plans for the Project, and their consultation approval requirements, are provided in Table 4-2.

Table 4-2 Environmental management plans, approval and consultation requirements

Plans to be developed and implemented	Comment	Consultation Requirements	Approval requirements
EMS	This Plan Includes waste and noise management.	-	To the satisfaction of the Planning Secretary
Traffic Management Plan (TMP; CoA B9, mitigation measure AT1 and L3)	-	Developed in consultation with Transport for NSW (TfNSW), Queanbeyan-Palerang Regional Council and Goulburn Mulwaree Council	To the satisfaction of the Planning Secretary
Landscaping Plan (CoA B11, mitigation measure V1)	Includes groundcover management plan	-	To the satisfaction of the Planning Secretary
Biodiversity Management Plan (BMP; CoA B14, mitigation measure B1)	Includes Vegetation Management Plan (mitigation measure B11) and Pest Action Management Plan (mitigation measure B15)	Developed in consultation with Biodiversity, Conservation and Science Directorate (BCS)	To the satisfaction of the Planning Secretary
Heritage Management Plan (HMP, CoA B21, mitigation measure AH1)	-	Developed in consultation with Aboriginal Stakeholders and Heritage NSW	To the satisfaction of the Planning Secretary
Soil and Water Management Plan (SWMP, CoA B25, mitigation measure S3 and W3)	Includes Erosion and Sediment Control Plan (ESCP, mitigation measure S3) and Spill and Contamination Response Plan (mitigation measure S5 and W1)	DPE Water	-
Fire Safety Study (FSS; CoA B26, mitigation measure BF15)	-	Consultation with Fire and Rescue NSW (FRNSW)	To the satisfaction of the FRNSW and Planning Secretary

Plans to be developed and implemented	Comment	Consultation Requirements	Approval requirements
Emergency Response Plan (ERP; CoA B29, mitigation measure BF13)	Includes Flood Response Plan (mitigation measure H2) and Business Floodsafe Plan (mitigation measure H5)	-	Provide a copy of the plan to the local Fire Control Centre and FRNSW
Accommodation and Employment Strategy (AES, CoA B32)	Includes Local Industry Participation Plan (mitigation measure S1)	Queanbeyan-Palerang Regional Council	To be provided to the Planning Secretary prior to construction
Bushfire Emergency Management and Operations Plan (mitigation measure BF2)	Includes Battery Fire Response Plan (mitigation measure PHA4)	Consultation with RFS and FRNSW	-
Erosion and Sediment Control Plan (ESCP; Mitigation measure S1)	Appendix of the SWMP	-	-
Construction Environmental Management Plan (CEMP)	-	-	-
Operational Environmental Management Plan (OEMP)	-	-	-
Decommissioning Environmental Management Plan (DEMP)	-	-	-

4.5. Consultation

Consultation has been completed in accordance with the requirements of the Project Approval as outlined in Table 4-2. Consultation summaries are included in the relevant plans detailing the consultation undertaken, the outcome of that consultation, as well as any matters resolved and unresolved.

BCSF will consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval. DPHI has been made aware of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.

4.6. Environmental Work Method Statements

Environmental work method statements (EWMS) will be prepared by GRS for all high risk environmental activities relevant to the Project. EWMS will be prepared prior to the commencement of relevant construction activities on site and will incorporate relevant mitigation measures and controls from management sub plans. EWMS will be prepared to identify risks, ensure sound environmental practices are implemented, and to minimise the risk of environmental incidents or system failures. EWMS are to be designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions.

EWMS will be developed for at least the following activities:

- Pre-construction activities including topsoil stripping and earthworks
- Activities that impact on environmentally sensitive areas (where required)
- Vegetation clearing and grubbing
- Working in or near waterways
- Dewatering
- Drainage works.

These activities may be incorporated into a singular EWMS, if determined appropriate by the Project Environment Manager. EWMS will be prepared by and/or in consultation with the person(s) conducting the high-risk environmental activity and will be signed off by the Project Environment Manager prior to the activity commencing

All Project personnel and sub-contractors undertaking a task governed by an EWMS must participate in training on the EWMS and acknowledge that they have read and understood their obligations prior to commencing work.

Regular monitoring, inspections and auditing against compliance with the EWMS will be undertaken by Project management, quality, and environmental personnel to ensure that all controls are being followed and that any non-compliances are recorded, and corrective actions implemented.

4.7. Sensitive area plans

To aid in the identification and protection of significant environmental features associated with the Project, a set of Sensitive Area Plans (SAPs) have been prepared. The SAPs are included in Appendix D. The sensitive area plans include information relating to (for example):

- Threatened ecological communities
- Watercourses
- Heritage items
- Sensitive receivers.

The SAPs are working documents and will be updated throughout the Project, as required.

4.8. Roles and responsibilities

The key environmental management roles and responsibilities for the construction phase of the Project are described below.

BCSF is the applicant and proponent for the Blind Creek Solar Farm. BCSF will engage contractors to undertake the construction activities. GRS has been engaged as the EPC contractor to undertake the construction activities (pre-construction and construction stages 1-4).

The GRS shall ensure specific responsibilities are communicated to all personnel via appropriate environmental management training (part of the initial safety and environment induction).

4.8.1. Environmental management team

BCSF and GRS's environmental management team is provided in Table 4-3.

Table 4-3 Environmental management team

Role	Responsibility
BCSF Project Manager	• Engaging with all relevant stakeholders and authorities to determine Project environmental requirements; and acquiring Project environmental approvals including relevant licensing and permits • Fulfilling the Proponent's obligations under the CoA for the Project works • Providing the contractor visibility and transparency to Project environmental requirements and commitments, to enable outcomes • Advising or enabling environmental requirements and considerations in a timely manner • Initiating and participating in Project meetings, workshops, and consultations to facilitate outcomes throughout the Project • Setting up and managing a Project complaint handling and resolution process, as detailed by the Project CoAs • Making Project approvals and environmental documents publicly accessible, as detailed by the Project CoAs • Regularly monitoring environmental performance and maintaining visibility on work sites for environmental compliance • Advising DPHI and Stakeholders on Project environmental performance • Duty to Notify and timely reporting of environmental incidents and non-compliances to the DPHI, and as otherwise required • Ensuring all Project activities are carried out in an environmentally responsible way, without environmental harm, and in compliance with the Project CoAs • Engaging a contract Superintendent that is familiar with the Projects environmental requirements and that in the event of contractual ambiguity or discrepancy an informed interpretation will be made.
GRS Project Manager	• Ensure all works comply with relevant regulatory and Project requirements

Role	Responsibility
	• Ensure the requirements of this EMS are fully implemented, and environmental requirements are not secondary to other construction requirements • Endorse and support the Project environmental policies, attached at Appendix C • Liaise with BCSF and Government authorities as required • Participate and provide guidance in the regular review of this EMS and supporting documentation • Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of this EMS • Ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements • Ensure that complaints are investigated to ensure effective resolution • Stop work immediately if an unacceptable impact on the environment is likely to occur.
GRS Construction Manager	• Plan construction works in a manner that avoids or minimises impact to environment • Ensure all requirements of this EMS are fully implemented • Ensure construction personnel manage construction works in accordance with statutory and approval requirements • Support the Site Environmental Manager in achieving the Project environmental objectives • Ensure environmental management procedures and protection measures are implemented • Ensure all Project personnel attend an environmental induction prior to commencing works • Liaise with BCSF and authorities as required • Stop activities where there is an actual or immediate risk of harm to the environment and advise the Site Environmental Manager.
GRS Superintendent	• Communicate with all personnel and sub-contractors regarding compliance with the EMS and site-specific environmental issues • Ensure the subcontractor documentation, plant and equipment has been approved prior to commencing on site. • Ensure all site workers attend an environmental induction prior to the commencement of works • Coordinate the implementation of the EMS • Coordinate the implementation and maintenance of pollution control measures • Identify resources required for implementation of the EMS • Support the Site Environmental Manager in achieving the Project environmental objectives, including on ground implementation of the EWMS

Role	Responsibility
	• Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Site Environmental Manager • Coordinate action in emergency situations and allocate required resources • Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and Site Environmental Manager.
GRS Site Environmental Manager	• Control field works and implement/maintain effective environmental controls • Ensure site activities comply with EWMS • Ensure all site workers are site inducted prior to commencement of works kept • Attend to any spills or environmental incidents that may occur on-site • Ensuring that the EWMS is established, implemented and maintained in compliance with all Environmental Assessment documents and approvals, including all sub-plans, procedures and supplementary EWMS, and upgrades to these documents (as needed) to remain current with the progress of the Work • Overall responsibility for the establishment, management, monitoring and maintenance of erosion and sediment controls within the site • Carrying out daily visual checks/assessments and perform inspections of the works weekly to ensure that environmental safeguards are being followed • Identifying where the implemented environmental measures are not meeting the targets set, and identifying areas where improvement can be achieved • Preparing reports outlining the works that have been undertaken and the achievements that have been met, as well as identifying those areas where improvements were made and detailing environmental performance. Environmental performance is to include all non-compliances with the requirements of any other environmental reporting requirements • Facilitating and developing the material for all environmental induction and toolbox talks for all site personnel • Specific authority to stop work on any activity where the Construction Environmental Manager deems it necessary to prevent environmental non-conformities, and notification to the relevant parties of any environmental incidents • Notify environmental incidents and reportable events immediately and submit reports.
GRS Health Safety Environment (HSE) Manager/Coordinator/ Officer	• Support the Site Environmental Manager on activities outlined above • Review the subcontractor documentation, plant and equipment has been approved prior to commencing on site.

Role	Responsibility
GRS Project/Site Engineers	• Provide input into the preparation of environmental planning documents as required • Ensure that instructions are issued and adequate information provided to employees that relate to environmental risks on-site • Ensure that the works are carried out in accordance with the requirements of the EMS and supporting documentation, including the implementation of all environmental controls • Identify any environmental risks • Identify resource needs for implementation of EMS requirements and related documents • Ensure that complaints are investigated to ensure effective resolution • Take action in the event of an emergency and allocate the required resources to minimise the environmental impact • Report any activity that has resulted, or has the potential to result, in an environmental incident or reportable event immediately to the Construction Manager and Site Environmental Manager.
GRS Supervisors	• Undertake any environmental duties as defined by the superintendent or Project/Site Engineer • Control field works and implement/maintain effective environmental controls • Where required, undertake environmental risk assessment of works prior to commencement • Ensure site activities comply with EWMS and relevant records are kept • Ensure all site workers are site inducted prior to commencement of works • Attend to any spills or environmental incidents that may occur on-site • Report any activity that has resulted, or has the potential to result, in an environmental incident or reportable event immediately to the Superintendent • Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and Site Environmental Manager.
Wider Project team (including subcontractors)	• Complying with the relevant requirements of the EMS, or other environmental management guidance as instructed by a member of the Project's management • Participating in the mandatory Project/site induction program • Reporting any environmental incidents to the site supervisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident • Undertaking remedial action as required to ensure environmental controls are maintained in good working order • Stopping activities where there is an actual or immediate risk of harm to the environment and advise the Project Manager, Construction Manager,

Role	Responsibility
	Superintendent or Site Environmental Manager.

4.8.2. Sub-contractors and sub-contractor management

Sub-contractors and their employees will be required to comply in full with the requirements of the EMS and relevant environmental requirements as it applies to site environmental management and control. Sub-contractors' personnel are considered equivalent to BCSF's Project personnel in all aspects of environmental management and control. Their responsibility in this respect mirrors those of BCSF's personnel.

In accordance with the Sub-contractor HSE Document Approval Process, Sub-contractors will be appointed and reviewed to determine suitability. Specifically, this process ensures that subcontractors' Safe Work Method Statements (SWMS) and EWMS have been assessed and are appropriate for the tasks being conducted.

The GRS Superintendent is responsible to ensure the subcontractor documentation, plant and equipment has been approved prior to commencing on site.

Sub-contractors working on the Project will be required to:

- Undertake environmental awareness training (refer to Section 7)
- Observe sub-contract and statutory requirements relating to environmental protection and other environmental legislation and to follow instructions issued by BCSF management and supervisory personnel
- Nominate site representatives to liaise with BCSF representatives with respect to, and take responsibility for, environmental requirements for the site activities
- Adhere to BCSF's environment management system as it applies to their operations on the site
- Undertake weekly environmental inspections of their work areas
- Co-operate fully with the site emergency incident procedures and consultative arrangements
- Follow procedures incorporated in the EMS.

All Subcontractors are monitored on site by the site supervisor and are required to work in accordance with their SWMS/EWMS at all times. All subcontractors are monitored on site for compliance in the same manner as BCSF employees. Monitoring will include but is not limited to:

- Undertaking daily checks of environmental controls in high-risk sites or in environmentally sensitive environments
- Documenting findings on daily checks and identifying mitigation measures
- Completing checklist as required.

Observations will be made by the Site Environmental Manager to assess the effectiveness of environmental protective measures being used onsite by the sub-contractor and to determine compliance with the requirements of the EMS.

Internal audits will also be conducted by BCSF to assess:

- Communication with sub-contractors
- Compliance with contractual requirements

- Knowledge of and compliance with the EMS
- Work procedures and environmental management controls on site.

5. Environmental risk assessment

The management of environmental impacts for the Project will follow a risk-based approach to determine the severity and likelihood of an activity's impact on the environment and to prioritise its significance. This process considers potential regulatory and legal risks also taking into consideration the concerns of community and other stakeholders.

Risk assessments are undertaken at various stages of the Project and documented in EWMS and other Project documents (e.g. SWMS). The objectives of these risk assessments are to:

- Identify activities, events or outcomes that have the potential to adversely affect the local environment and/or human health/property
- Qualitatively evaluate and categorise each risk item
- Assess whether risks can be managed by environmental protection measures
- Qualitatively evaluate residual risk with implementation of measures.

GRS will maintain the Project environmental risk register to address risks specific to the scope. Risks will be required to be reviewed on a regular basis and will also be reviewed in response to incidents, changes in legal requirements, change in Project scope, findings of inspections and audits and management reviews.

6. Environmental mitigation measures

All reasonable and feasible measures will be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, upgrading, commissioning, rehabilitation or decommissioning of the development. Project environmental mitigation measures are provided in Table 6-1 and relevant subplans.

Table 6-1 Project environmental mitigation measures

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
EMS1	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Induction materials Toolbox training material	All stages	BCSF Project Manager	COA A12 Good practice
EMS2	All mitigation measures outlined in this EMS and the environmental management plans listed in Section 4.4 will be implemented throughout the relevant stages of the Project.	Sub-plans	All stages	BCSF Project Manager	Good practice
EMS3	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure. The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.		Pre-construction	BCSF Project Manager	CoA C8

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
EMS4	Prior to commencing operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department via the Major Projects website and to Queanbeyan-Palerang Regional Council.		Pre-construction	BCSF Project Manager and GRS Project Manager	CoA C9
EMS5	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS and must not impact areas of EEC during the construction, operations and decommissioning of the project.		Pre-Construction	BCSF Project Manager	CoA B13
EMS6	Permit and licences outlined in Section 3.3 of this EMS will be acquired where required.		Pre-construction Construction	BCSF Project Manager GRS Project Manager	Good practice
EMS7	All plant and equipment used on site, or in connection with the development, must be: • Maintained in a proper and efficient condition; and • Operated in a proper and efficient manner.		All stages	GRS Supervisor Operator	CoA A9 N4
EMS8	Unless BCSF and the applicable authority agree otherwise, BCSF must: • Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and		All stages	BCSF Project Manager	CoA A8

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
	• Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. Note: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.				
Noise and vibration					
EMS9	Noise generated by any construction, upgrading or decommissioning activities will be minimised on site in accordance with best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009) or its latest version;	Interim Construction Noise Guideline (DECC, 2009)	All stages	GRS Site Environmental Manager	CoA B16
EMS10	All staff onsite shall be informed of how to operate plant and equipment in a quiet and efficient manner (i.e. no unnecessary idling, daily machinery pre-start checks to ensure proper mechanical working order)		All stages	GRS Project Manager	N1
EMS11	Use less noisy plant and equipment where feasible and reasonable.		All stages	GRS Supervisor Operator	N1
EMS12	Use and maintain ‘noise control’ or ‘silencing’ kits fitted to machines to ensure they perform as intended.		All stages	GRS Supervisor Operator	N1

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
EMS13	Strategically position plant on site to reduce the emission of noise to the surrounding neighbourhood and to site personnel.		All stages	GRS Supervisor Operator	N1
EMS14	Avoid any unnecessary noise when carrying out manual operations and when operating plant.		All stages	GRS Supervisor Operator	N1
EMS15	Any equipment not in use for extended periods during construction work will be switched off		Construction	GRS Supervisor Operator	N1
EMS16	Noise and vibration complaints that arise from construction activities will be dealt with in accordance with the Project's Complaints Procedure. Each complaint will be investigated and noise monitoring undertaken to confirm exceedances. Where exceedances are confirmed appropriate noise amelioration measures in consultation with a noise consultant will be put in place to mitigate future occurrences.	Section 8.3 of this EMS	Construction	GRS Project Manager	N1
EMS17	During construction the surrounding receivers and community will be kept informed on the Project's progress and how they can make a compliant.		Construction	BCSF Project Manager	Best practice
EMS18	Potential noise impacts to associated receivers R2 and R48, will be managed in consultation with the homeowner and may include the following:		Construction	GRS Project Manager	N2

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
	• Time restrictions and/or providing periods of respite for residents, where feasible and reasonable e.g., between 10am and 3pm (with one-hour break for lunch between 12pm and 1pm). • Allowing the construction activities to proceed, despite the noise exceedance, may be the preferred method in order to complete the works expeditiously, with noise exceedances occurring over only two to three days. • These residents will be consulted to determine appropriate respite periods and will be notified of the potential noise impact during this time period so that they can organise their day around the noisy period.				
EMS19	Noise generated by the operation of the development during the night will not exceed 35 dB(A) LAeq, 15min in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.		Operation	BCSF Project Manager	CoA B16
Waste management					
EMS20	Resource management hierarchy principles are to be followed: • Avoid unnecessary resource consumption as a priority. • Avoidance is followed by resource recovery (including reuse of materials, reprocessing, and recycling and energy recovery). • Disposal is undertaken as a last resort (in accordance with the *Waste Avoidance & Resource Recovery Act 2001*).		All stages	GRS Site Environmental Manager	CoA B31

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
EMS21	No waste is to be received onsite or disposed onsite.		All stages	GRS Site Environmental Manager BCSF Project Manager	CoA B31
EMS22	Working areas are to be maintained, kept free of rubbish and cleaned up at the end of each working day.		Construction	GRS Site Environmental Manager	Best practice
EMS23	Excavated material will be reused on-site for fill where practicable.		Construction	GRS Supervisor	Best practice
EMS24	Identification of opportunities to avoid, reuse and recycle, in accordance with the waste hierarchy		All stages	GRS Site Environmental Manager BCSF Project Manager	R1
EMS25	Provision for recycling management on-site, supplying appropriate bins or skips, engaging with licensed recycling contractors; implementation of monitoring and reporting systems, and disposal of waste at facilities permitted to accept the waste.		All stages	GRS Site Environmental Manager	R1

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
				BCSF Project Manager	
EMS26	Tracking of all waste leaving the site		All stages	GRS Site Environmental Manager BCSF Project Manager	R1
EMS27	Waste receptacles and site amenities will be inspected as part of the weekly environmental inspection to ensure waste is appropriately being disposed of, there is adequate capacity in bins onsite and no litter is present around the site.		Construction	GRS Site Environmental Manager	Best practice
EMS28	Disposal of waste at facilities permitted to accept the waste.		Construction	GRS Site Environmental Manager	R1
EMS29	Ensure waste is contained in bins or waste areas in high winds or rain events.		Construction	GRS Site Environmental Manager	Best practice
EMS30	Provision of toilet facilities for on-site workers and identify that sullage would be disposed of (i.e., pump out to local sewage treatment plant.		Construction	GRS Site Environmental Manager	R1

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
EMS31	A septic system would be installed and operated according to the Queanbeyan Palerang Regional Council regulations.		Construction	GRS Supervisor	R2
EMS32	If concrete washout is required onsite, a dedicated concrete washout facility will be provided during construction so that run-off from the washing of concrete machinery and equipment can be collected and disposed of at an appropriate waste facility.		Construction	GRS Site Environmental Manager	Best practice
EMS33	All waste is to be classified in accordance with the EPA's Waste Classification Guidelines 2014. All waste is to be stored and handled onsite in accordance with its classification.	EPA's Waste Classification Guidelines 2014	Construction	GRS Site Environmental Manager	CoA B31
EMS34	All waste removed from site will be recorded in the Waste Register.	Waste register (	Construction	GRS Site Environmental Manager	R1
EMS35	Waste leaving site is to be covered.		Construction	GRS Supervisor	R1
EMS36	Once the works have been completed, all waste material is to be removed from site, recycled or disposed of at a licenced facility. Waste is not to be buried on site.		Construction	GRS Site Environmental Manager	CoA B31 R1

7. Training, awareness and competency

To ensure that this EMS is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this EMS. BCSF also must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the CoA relevant to activities they carry out in respect of the development.

The Site Environmental Manager will coordinate the environmental training in conjunction with other training and development activities (e.g. safety).

7.1. Environmental induction

Prior to working on site, all personnel and sub-contractors will undertake an environmental induction as part of the site induction. This is done to ensure all personnel involved in the Project are aware of the requirements of the EMS and to ensure the implementation of environmental management measures.

Short-term visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.

The Project Manager is responsible to ensure that all employees and contractor employees attend an induction prior to starting work.

All staff attending site will be required to attend a health and safety, quality and environment induction prior to starting work on the Project. The environment section covers core issues which may include (but not limited to):

- Relevant details of the EMS including purpose and objectives
- Requirements of due diligence and duty of care
- Conditions of environmental licences, permits and approvals
- Potential environmental emergencies on site and the emergency response procedures
- Reporting and notification requirements for pollution and other environmental incidents or reportable events, including identification of contaminated land and damage and maintenance to environmental controls
- High risk activities and associated environmental safeguards
- Controls when working in or near environmentally sensitive areas
- Specific environmental management requirements and responsibilities
- Mitigation measures for the control of environmental issues
- Incident response and reporting requirements
- The existence of EWMS for high-risk activities
- Information relating to the location of environmental constraints
- Site specific issues including:
    - Site flagging protocol
    - Erosion and sediment controls, water quality controls and sediment basin management
    - Management of contaminated material
    - Groundwater and surface water management and controls
    - Obligations under the *Biosecurity Act 2015* to prevent the spread of weeds during construction

- Responsibilities under the following legislation and permits:
  - *National Parks and Wildlife Act 1974*, including the need to cease. work immediately and report any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations
  - *Protection of the Environment Operations Act 1997*
- Noise, vibration and air quality management controls
- Requirement to maintain surrounding property access for residences, business owners, and their visitors, and to minimise disruptions to these properties for the duration of construction
- Waste minimisation and disposal protocols
- Boundaries for vegetation clearing, fauna and fauna habitat management, including awareness of threatened fauna species and fauna rescue
- Incident management processes
- Environmental emergencies including pollution incidents, floods and bushfires.

- Key environmental issues
- Site-specific training will be provided to personnel engaged in activities or areas of higher risk, including but not limited to:
  - Working in and near waterways
  - Construction noise management.

The site induction will also include communications training including:

- How to respond to community queries
- Aware and abide by the requirements for the release of information.

A record of all environment inductions will be maintained and kept on-site in hard copy or in database. The Site Environmental Manager may authorise amendments to the induction at any time. Possible reasons for changes to the induction may be Project modifications, legislative changes or amendments to this EMS or related documentation.

An induction register is kept within the Online Risk and Compliance Platform (Hammertech).

7.2. Toolbox talks, training and awareness

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all aspects of construction including environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction.

Relevant environmental issues include (but are not limited to):

- Erosion and sedimentation controls
- Working hours
- Emergency and spill response
- Weed management
- Water management
- Construction noise management
- Working in or near waterways
- Dust control
- Vegetation trimming and clearing

- Waste storage and segregation
- Management of identified heritage items.

Toolbox talk attendance is mandatory, and attendees of toolbox talks are required to acknowledge upon signing into site, with records maintained in Hammertech.

As required, targeted environmental training will be provided for nominated personnel.

All environmental monitoring and testing are to be conducted by persons who are appropriately qualified and trained.

7.3. Environmental awareness training

Staff and sub-contractors working on site will be provided with environmental training that will be incorporated into 'toolboxes' and inductions. Formal qualifications for specialist staff may be required in relation to activities such as animal handling and the design of erosion and sedimentation control plans. The aim will be to achieve a level of awareness and competence appropriate to their assigned activities.

Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.

This training will generally be prepared and delivered by the Site Environmental Manager or any HSE Member. The target groups and suggested topics for this training are detailed in Table 7-1.

Another way to inform construction personnel will be through the development and distribution of awareness notes throughout daily pre-start meeting. These may typically take the form of a poster, booklet, or similar and will be distributed to engineers, leading hands, foreman and others with a responsibility for managing specific work locations or activities. This documentation will be used to inform the broader workforce through either daily pre-start meeting (see section below) or provision in worker crib sheds/break facilities.

Refresher environmental awareness training will be undertaken as required, but not less than 6 monthly intervals, based on environmental risks and turnover of personnel. Refresher environmental awareness training will be recorded on Hammertech other Electronic Document Management System (e.g. SharePoint).

A training register is kept on site as part of Project Quality System to demonstrate compliance with EMS and sub plans activity training records.

Table 7-1 Example environmental training schedule

Training	Senior Managers	Superintendents	Engineers	Environmental Staff	Leading Hands	Sub-Contractors	Administrative Staff
Project Inductions	✓	✓	✓	✓	✓	✓	✓
Biodiversity Awareness (Induction and Toolbox talks)	✓	✓	✓	✓	✓	✓	
Heritage Awareness (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓	
Noise, Dust, Erosion & Sediment Control (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓	
Spill Response (Induction and toolbox talks)	✓	✓	✓	✓	✓		
Erosion and sedimentation controls (including leachate drainage	✓	✓	✓	✓	✓	✓	
Emergency procedures	✓	✓	✓	✓	✓	✓	✓

7.4. Daily pre-start meetings

The pre-start meeting is a tool for informing the workforce of the day’s activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day’s work.

The Supervisor/HSE member will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Daily pre-start meetings are generally succinct in nature and take about 10–15 minutes.

The environmental component of pre-starts will be determined by relevant supervisor and environmental personnel and will include any environmental issues that could potentially be impacted by, or impact on, the day’s activities. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained via Hammertech.

Pre-start topics, dates delivered, and a register of attendees will be recorded and kept in Hammertech as part of Project Quality System to demonstrate compliance with EMS activities.

8. Communication

8.1. Internal communication

Clear lines of communication through all levels and functions (e.g. management, staff and sub-contractors), is key to minimise environmental impacts and achieving continual improvements in environmental performance.

The methods of communication on site will include:

- Pre-start meetings
- Inductions
- Toolbox talks
- Alerts, bulletins and / or initiatives
- EWMS.

The Site Environmental Manager will meet as part of Project meetings to discuss any issues with environmental management onsite, any amendments to plans that may be required or any new/ changes to Project activities.

Regular environmental inspections will be scheduled with the Site Environmental Manager and relevant Project staff. The purpose of these inspections will be to communicate ongoing environmental performance and to identify any issues to be addressed.

In addition, the Site Environmental Manager will participate in toolbox talks as per Project basis. This forum will provide an opportunity for the environment team members to communicate on environmental performance, to advise on any upcoming sensitive environmental matters for future work areas and receive feedback from onsite personnel.

Further internal communication regarding environmental issues and aspects will be through awareness training as described in Section 7.3 of the EMS.

8.2. External communication

8.2.1. Agencies and authorities

The BCSF Project Manager has the responsibility to report on the ongoing environmental performance of the Project to DPHI and any other relevant authorities. The GRS Project Manager will report regularly to BCSF Project Manager on progress and any key environmental matters. BCSF Project Manager will report to DPHI through the monitoring and reporting requirements listed in Section 10.4.

The GRS Project Manager, and the Site Environmental Manager are the two 24-hour contacts. They have the authority to halt the progress of the works if necessary. They are the key emergency response personnel during an environmental site emergency.

The Site Environmental Manager is the authorised contact person for communications with BCSF, DPHI, EPA and any other relevant authorities on environmental matters. BCSF Project Manager will be included in all correspondence with any regulatory Authorities, unless agreed otherwise.

Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, BCSF Project Manager must notify DPHI in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the DPHI in writing prior to commencing the relevant stage, and clearly identify the development that will be carried out during the relevant stage.

It is noted, that BCSF Project Manager must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:

- Any strategies, plans or correspondence that are submitted in accordance with this consent
- Any reports, reviews or audits commissioned by the Department regarding compliance with this consent
- The implementation of any actions or measures contained in these documents.

8.2.2. Community and stakeholders

A Community and Stakeholder Engagement Plan has been developed to provide an approach to stakeholder and community communications for the Project. The plan identifies opportunities for providing information and consulting with the community and stakeholders during the Project. The plan contains:

- Identification of community stakeholders that are likely to be affected by the Project
- Issues and risks related to the engagement of each stakeholder group
- A consultation strategy for each stakeholder group
- A set of activities against the project development timeline to facilitate consultation.

The plan will continue to be implemented during construction. BCSF will provide regular updates about the progress of the project via the project website and newsletters.

The Communications Manager of BCSF Stakeholder Engagement Manager will be responsible for management of the Community Contacts Database. Details regarding the specific requirements for maintaining this database and reporting will be included in the Community and Stakeholder Engagement Plan.

GRS Project Manager is required to consult and notify neighbours of the Blind Creek Solar Farm about any major deliveries which may require traffic control and disruption to access at least seven days before delivery. The notification will provide details of:

- The Project
- The construction period and construction hours
- Delivery traffic control and disruptions
- Contact information for Project management staff
- Complaint and incident reporting
- How to obtain further information.

Any concerns raised by residents are to be addressed in accordance with the complaints procedure as outlined below.

8.3. Complaint procedure

External complaints are defined as complaints received from parties outside of the normal lines of communication and are formal specific concerns about the Project.

On receiving a complaint, the GRS Project Manager or delegate will promptly conduct a review to determine the appropriate response and whether issues relating to the complaint could be avoided or minimised. Records of all complaints received and documents as per the Community and Stakeholder Engagement Plan and may include the following details:

- Date and time of the complaint
- Method by which the complaint was made
- Any personal details of the complainant
- The nature of the complaint
- Action taken in relation to the complaint and any follow up
- Any monitoring to confirm that the complaint has been satisfactorily resolved
- If no action taken, reasons why.

Attempts will be made to resolve all complaints in accordance with the Community and Stakeholder Engagement Plan and this EMS. All complaints will be acknowledged within two hours. An initial response to complaints will be provided within 24 hours of a complaint being received. A further detailed response, including steps taken to resolve the issue(s) that lead to the complaint, will be provided within 10 days. All complaints will be closed off in the stakeholder database. At all times the stakeholder will be kept informed of when they will receive a response.

The GRS Project Manager or delegate will apply an adaptive approach to ensure that corrective actions are applied in consultation with the appropriate construction staff to allow modifications and improvements in the management of any environmental issues resulting in community complaints.

Within one working day of receiving a complaint a written report will be provided to BCSF; this will outline the complaint and action taken to remedy the problem. A final report which will include proposed measures to prevent reoccurrence will be submitted to BCSF within five working days

8.4. Dispute resolution

Disputes are broader disagreements between parties that generally include multiple concerns. Any disputes that may arise during the Project, will be handled by the GRS Project Manager or delegate in accordance with the complaint procedure outlined in Section 8.3. As part of the compliant procedure, disputes will involve further consultation and negotiation with the parties involved and if required mediation to assist with finding a resolution.

9. Incidents and emergencies

9.1. Emergency contact details

Emergency contact details for key GRS Project personnel and emergency services are listed in Table 9-1.

Table 9-1 Emergency contact details for the Project

Name / organisation	Contact
David Tullis / GRS Project Manager	0429 420 038
Sergio Martin Sanchez / GRS Construction Manager	0428 971 331
Site Environmental Manager	TBC
Emergency (Police, Fire, Ambulance)	000
NSW SES	132 500
NSW Fire and Rescue - Queanbeyan	02 6229 6728
Queanbeyan- District Hospital and Health Service	(02) 61507000
RSPCA NSW	1300 278 358
WIRES NSW	1300 094 737
Queanbeyan-Palerang Regional Council	1300 735 025

9.2. Emergency and incident preparedness

The following plans relating to emergency and incident response have been prepared for the Project:

- Emergency Response Plan
- Business Floodsafe Plan
- Soil and Water Management Plan - Spill Response Procedure.

During the course of the Project, the following preventative strategies will be implemented onsite:

- Regular inspections of active work sites
- Completion of Environmental Inspection Checklist (weekly)

- Issue and quick close-out of non-compliance notices (as required)
- Prompt maintenance and repairs
- Ongoing environmental training
- Access for emergency services vehicles will be maintained throughout the site at all times
- Environmental audits of worksites, subcontractors and general compliance.

Spill kits will be available at the main site office and where liquid substances are to be stored. Spill kits and other emergency supplies (e.g. silt fences, pumps) will also be located at site compounds, machinery park up areas and on refuelling vehicles.

Consulting with emergency services and NSW Police as required throughout construction to ensure that any potential impacts to emergency services are identified and appropriately managed.

An up-to-date list of emergency response personnel and relevant organisations (emergency services, EPA, etc.) will be maintained at the main office and site compounds.

All staff will be trained on what to do and how to respond to an emergency onsite during the site induction and throughout the life of the Project via ongoing safety training and toolboxes.

Environmental incidents

An Environmental Incident is defined as a set of circumstances that causes or threatens to cause material harm to the environment. Material Harm to the environment is harm that:

- Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).

Various environmental incidents may have the potential to occur on site, which may include but not be limited to the following:

- Spills of fuels, oils, chemicals and other hazardous materials
- Unauthorised discharge from sediment basins or other containment devices
- Unauthorised clearing or clearing beyond the extent of the Project boundary or premises
- Inadequate installation of temporary erosion and sediment controls and subsequent failure to prevent sediment laden run off from leaving the site
- Unauthorised damage or interference to threatened species, threatened ecological communities or critical habitat
- Unauthorised harm or desecration to Aboriginal objects and Aboriginal places
- Unauthorised damage or destruction to any State or locally significant relic or Heritage item
- Unauthorised dredging or reclamation works within a watercourse
- Potential contamination of waterways or land
- Accidental starting of a fire or a fire breaking out of containment
- Any potential breach of legislation, including a potential breach of a condition of: An environment protection licence, approval, or any agency permit condition
- Works done that are not covered by the Project approval, or not found to be consistent with the approval, or done without a modification of the approval

- Works undertaken that are not in accordance with the Environmental Assessment documents
- Unauthorised dumping of waste.

Should an incident occur, the Superintendent/Supervisor will ensure that work ceases in that area and that the site is not disturbed until the appropriate level of investigation is conducted to ensure that any potential evidence is preserved.

9.3. Non-compliance, corrective and preventive actions

A non-compliance is an occurrence, set of circumstances or developments that is a breach of the CoA but it not an incident.

Any member of the Project team may raise a non-compliance or improvement opportunity. Environmental non- compliance ‘s might include:

- Failing to comply with the environmental regulations or license/ permit conditions
- A serious breach of EMS requirements
- Carrying out an unsafe work practice that has the potential to cause harm to the environment (i.e. near misses)
- Activities that have caused actual harm to the environment not permitted by the Project or covered in the environmental assessment documentation
- Deficiencies or concerns raised by client representatives and/or by state and local authorities or agencies.

For each non- compliance identified a corrective/preventative action (PCAR or actions) must be implemented. In addition, any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, audit findings or other reviews. Improvement opportunities may also result in the implementation of corrective/preventative actions.

Corrective/preventative actions and improvement opportunities will be entered into Hammertech and include detail of the issue, action required and timing and responsibilities. The record will be updated with date of close out and any necessary notes. The database will be reviewed regularly to ensure actions are closed out as required.

Non-conforming activities may be stopped, if necessary, by the Site Environmental Manager following consultation with the Construction Manager or delegate. The works will not commence until a corrective/preventative action has been closed out.

10. Inspections, monitoring and auditing

10.1. Environmental inspections

Throughout the Project, the Site Environmental Manager will be responsible for carrying out weekly environmental inspections and rainfall inspections as required using GRS standard templates, refer to Table 10-1.

The sub-contractors will attend inspections in relevant areas as required. The Site Environmental Manager will attend debriefing session following inspections.

All deficiencies must be promptly issued to the applicable parties, actioned, verified and closed out within an appropriate time frame based on the risk score associated with each deficiency. Actions listed will be identified and an appropriate time frame to close out will take into consideration risks (e.g. location, weather).

Other environmental specialists may be engaged to enter site for the purposes of surveillance or inspection, to liaison with Project personnel, and to attend site meetings to discuss aspects of the work.

Table 10-1 Inspection schedule

Activity	Frequency	Responsibility	Record
Environmental site inspection	Weekly	Site Environmental Manager	Environmental inspection – Weekly (GRS template)
Pre-rainfall inspection	Prior to the start of a forecast >10mm rainfall event during work hours	Site Environmental Manager	Pre-rainfall event inspection (GRS template)
Post-rainfall inspection	Within 24 hours of a >10mm rainfall event occurring	Site Environmental Manager	Post-rainfall event inspection (GRS template)

10.2. Environmental monitoring

The objective of the monitoring and reporting will be to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this EMS, and to address specific requirements. The monitoring requirements for required aspects are included in the relevant environmental management sub plans.

Table 10-2 Summary of monitoring requirements

Aspect	Addressed	Monitoring parameters	Frequency	Reporting
Heritage	HMP	Monitoring the performance of mitigation measures in the HMP Protection (fencing and signage) of heritage items not approved to be impacted No work continuing if heritage is found Heritage management measures fully implemented and no heritage incidents.	Weekly during construction Annually post construction At completion of works	Environmental inspection Post works report
Aboriginal heritage salvaged items	HMP	Monitoring of salvaged items	Post salvage to outline the effectiveness of the program, Fortnightly to inspect items are still protected during construction 6 monthly post construction	Salvage report Environmental inspection
Traffic	TMP	Monitoring of vehicle movements and deliveries including heavy vehicles and over-dimensional	Daily	Security Recording sheets/Coordination meeting (SIM-OPS)
		Monitoring of weather and onsite conditions	Daily	Daily pre-start
		Monitoring the number of incidents, accidents and near misses	Daily	Monthly reports
		Spot check of routes taken at site entry and adjoining local roads and monitoring any feedback from the Community, Council and TfNSW	Regular	Recording sheets Incident reports
		Monitoring of local road conditions for damage and site	Daily	Visual checks/Inspection

Aspect	Addressed	Monitoring parameters	Frequency	Reporting
		exit points for dirt transferred to public roads.		sheets
		Monitoring of integrity and effectiveness of drains	Weekly	Inspection sheets
		Monitoring the performance and effectiveness of traffic controls and mitigation measures in the TMP	Weekly	Inspection sheets
Biodiversity	BMP	Monitoring the performance of mitigation measures in the BMP and strategies	Refer to the BMP monitoring program	Environmental inspection
Landscaping	LP	Monitoring the performance of plantings, screening and mitigation measures in the LP.	Refer to the LP monitoring program	Environmental inspection
Noise & Vibration	EMS	Attended noise or vibration monitoring	In response to a compliant or an identified concern of potential exceedance. During approved out of hours work	Noise or vibration report/recording forms
		Monitoring the performance of mitigation measures in the NVMP	Weekly	Environmental inspection
Soil and water	SWMP ESCP	Regular visual monitoring for the following: Any visible signs of erosion Drainage and erosion & sediment controls are in place and in good working order Soil stockpiles and excavations are being protected Sediment has been removed following large storm events and controls maintained	Weekly	Environmental inspection

Aspect	Addressed	Monitoring parameters	Frequency	Reporting
		For indications of sediment-laden waters, waste waters or pollution (e.g., grease/oil, effluent) due to a spill or that have left site		
Air Quality	SWMP ESCP	Visual exhaust from machinery, Observation of odours	Weekly	Environmental inspection
		Visible dust in air	Daily – implement mitigation as required (cease dust generating activities and water down surfaces)	Site supervisor diary Environmental inspection
Waste	EMS	Waste tracking for materials taken to a licenced facility	When waste taken offsite. Waste Register to be updated regularly.	Project data record
			When waste taken offsite to a waste facility.	Waste dockets
			When EPA ‘Trackable’ waste taken offsite.	Transportation dockets
		Inspections for litter, materials management, unauthorised disposal of construction waste streams and adequacy of capacity of waste receptacles	Weekly	Environmental Inspection
Accommodation and Employment	AES	Communicate and provide accountability for the objectives of the accommodation strategy Communicate and provide accountability for the objectives of the employment strategy Build community trust and engagement with Blind Creek	When enquiries and complaints are received Monthly Project meetings Quarterly to external parties during construction Annually to external	Complaints register Monthly reports Monitoring reports

Aspect	Addressed	Monitoring parameters	Frequency	Reporting
		Solar Farm Gather and integrate learnings for application to this and future projects Establish and maintain a complaint and feedback system.	parties during operations	

10.3. Auditing

10.3.1. Internal audits

Internal audits are to be carried out within three (3) months of commencing work onsite and then at least every six (6) months after that (refer to Table 10-3) during construction. These audits will be risk-based and verify that the work under the contract complies with the EMS, sub-plans and approval requirements. More frequent auditing may occur if environmental checks indicate major deficiencies with environmental management of the site.

Internal audits will be conducted in accordance with ISO AS/NZS19011:2019 - Guidelines for Quality and/or Environmental Management Systems Auditing, however where a specific issue arises internally, this will not necessarily follow this standard.

An audit checklist will be developed and amended as necessary to reflect changes to this EMS, subsequent approvals and changes to Acts, regulations or guidelines.

10.3.2. Independent environmental audits

External auditing will be undertaken by an independent environment auditor in accordance with ISO AS/NZS19011:2019 - Guidelines for Quality and/or Environmental Management Systems Auditing.

In accordance with Condition C14-19 of the Development Consent, Independent Audits of the Project must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:

- Within 3 months of commencing construction
- Within 3 months of commencement of operations.

The proposed independent auditor for the Project must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above upon giving at least 4 weeks' notice to BCSF of the date upon which the audit must be commenced.

In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), BCSF must:

- Review and respond to each Independent Audit Report prepared under Condition C14 of Schedule 2 of this consent, or Condition 16 of Schedule 2 where notice is given by the Planning Secretary
- Submit the response to the Planning Secretary
- 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.

Independent Audit Reports and BCSF'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 Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.

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.

Table 10-3 presents auditing requirements that are applicable to the Project.

Table 10-3 Audit summary table

No.	Audit	Requirement	Timing	Responsibility	Recipient
1	Internal Audit.	Verify compliance with legal requirements, specifications and construction documentation.	The first audit within 3 months of commencement of construction and then at six monthly intervals thereafter. The final submitted within five working days of construction contract completion date.	GRS Site Environmental Manager	GRS/BCSF
2	Independent environmental audit	Verify compliance with approval and legal requirements, construction documentation and any other commitments.	Within 3 months of commencing construction; and Within 3 months of commencement of operations.	BCSF	GRS/DPHI

10.4. Reporting

Table 10-4 sets out the general reporting requirements applicable to the Project, timing of the reporting, who is responsible for managing preparation of the reports, and the intended recipient(s).

Additional reporting may be necessary as the works progress. In such a circumstance, Table 10-4 will be amended to reflect these changes.

Table 10-4 General reporting requirements

No.	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report. Formalised in meeting minutes with client.	For incorporation in Project Monthly Reports including environmental statistics (i.e. incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance, key environmental issues, environmental controls implemented, details of any non-compliances and actions undertaken to address the non-compliance, and any predicted environmental impacts for the following month.	Monthly	GRS Project Manager, Site Environmental Manager	BCSF
2	GRS Environmental inspection report	Response to matter raised from BCSF site inspections.	Monthly or as needed	Site Environmental Manager	GRS

10.4.1. Incident reporting

All workers (employees and contractors) are responsible for ensuring timely and effective initial internal reporting of Incidents that they are involved with or witness.

GRS are to be informed of any environmental incidents immediately (or soon thereafter) verbally and within 24 hours in writing. Incident reports will include lessons learnt from each environmental incident occurring. Including lessons learnt from each environmental incident and proposed measures to prevent the occurrence of a similar incident. All efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident.

BCSF will be responsible to notify any agencies of any incidents on site (i.e. EPA). Within 7 days of the date of the incident, GRS must provide BCSF a detailed report on the incident, and such further reports as may be requested.

Where an incident involves an Aboriginal site, relevant authorities such Heritage NSW and Registered Aboriginal Parties will be notified, and their input sought in closing out the incident.

Incident reporting in accordance with the conditions

The GRS will immediately notify BCSF of an incident which arises through the Infrastructure Approval. In accordance with Condition C10 of the Development Consent, the Planning Secretary must be notified in writing via the Major Projects website immediately of BCSF becoming aware of an incident.

Written notification of an incident must:

- Identify the development including development name and application number

- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident).

As per Appendix 6 of the Development Consent, within 7 days after the applicant becomes aware of an incident, the Applicant must provide the Planning Secretary via the Major Projects website with written incident notification that:

- Identify the development and application number
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
- Identifies how the incident was detected
- Identifies when the Applicant became aware of the incident
- Identifies any actual or potential non-compliance with conditions of consent
- Describe what immediate steps were taken in relation to the incident
- Identifies further action(s) that will be taken in relation to the incident
- Identifies a Project contact for further communication regarding the incident.

Even if BCSF fails to give immediate notification the above notification is required to be completed.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the BCSF must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

The incident report must include:

- A summary of the incident
- Outcomes of an incident investigation, including identification of the cause of the incident
- Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence, including the period for implementing any corrective and/or preventative actions; and
- Details of any communication with other stakeholders regarding the incident.

GRS will submit additional information and reports relating to the incident, as required by the Planning Secretary. Non-compliances will be reported in accordance with Section 10.4.2 of this EMS.

All written requirements of the Planning Secretary or relevant public authority, which may be given at any point in time, to address the cause or impact of an incident must be complied with, within any timeframe specified by the Planning Secretary or relevant public authority.

Incident reporting in accordance with the POEO Act

BCSF will notify the EPA of any environmental incidents or pollution incidents on or around the site via the EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the *Protection of the Environment Operations Act 1997* (NSW) (POEO Act). The circumstances where this will take place include:

a) If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial
b) If actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds $10,000 (Material Harm).

Pollution incidents posing material harm to the environment shall be notified by BCSF to each 'relevant authority' as defined in Section 148 (8) of the POEO Act. 'Relevant authority' means:

- NSW EPA as the appropriate regulatory authority (ARA) on **131 555 or (02) 9995 5555.**
- Safe Work NSW (formerly WorkCover) on **13 10 50.**
- Fire and Rescue NSW on **000** or for Mobiles Only **112.**

10.4.2. Non-compliance reporting

BCSF will notify the Department within seven days of becoming aware of a non-compliance. The notification will be in writing and submitted via the NSW planning portal (Major Projects). In accordance with Condition C12 of the Development Consent, the notification will:

- Identify the development (including the development application number and name)
- Set out the condition of this consent that the development is non-compliant with
- Provide justification for why the development is non-compliant
- Provide the reasons for the non-compliance (if known)
- Describe what actions have been undertaken, or will be undertaken, and when, to address the non-compliance.

In accordance with Condition C13 of Schedule 2, a non-compliance that has been notified as an incident does not need to also be notified as a non-compliance.

11. Review and improvement

11.1. Revision

A document review process ensures that environmental documentation including this EMS is updated as appropriate for the specific works that are occurring on-site. Reviews of the EMS may be triggered by:

- Independent Environmental Audit
- Internal audits
- Additional environmental aspects and risks
- Environmental near misses and incidents
- Project stage change between construction, operation, and decommissioning.

Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the GRS Project Manager or delegate to prepare the revised documents.

In accordance with Condition C2 of Schedule 2 of the Development Consent, this EMS will be reviewed and revised (if necessary) within one (1) month (unless otherwise agreed with the Planning Secretary) of:

- The submission of an incident report under Condition C10 of Schedule 2
- The submission of an audit report under Condition C14 of Schedule 2
- Any modification to the conditions of this consent.

The GRS Project Manager or delegate must review, and if necessary, revise the strategies, plans, and programs required under the Development Consent to the satisfaction of the Planning Secretary.

Where this review leads to revisions in any such document, then within four weeks of the review, the revised document will be submitted to the Planning Secretary for review and approval, unless otherwise agreed with the Planning Secretary.

In accordance with Condition C3 of Schedule 2, with the approval of the Planning Secretary, the Applicant may:

- Prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program)
- Combine any strategy, plan or program required by the Project consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined)
- Update any strategy, plan or program required by the Project consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).

As per Conditions C4, C5 and C6 of Schedule 2, if the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in the Project consent. If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program. If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of the Project consent if those requirements are not applicable to the particular stage.

Only the GRS Project Manager, or delegate, has the authority to change any of the environmental management documentation.

Should the EMS or management plans not require review or revision under Condition C2, then they will be reviewed at least annually by GRS Project Manager.

The approved EMS will be held in the site office and be available upon request.

11.2. Continual improvement

Continual improvement of this Strategy will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying 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-compliance and deficiencies
- Develop and implement a methodology of corrective and preventative action to address any non-compliance and deficiencies
- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets.

12. Documentation

12.1. Environmental records

The Site Environmental Manager is responsible for maintaining all environmental management documents as current at the point of use. Types of records include:

- All monitoring, inspection and compliance reports/records
- Correspondence with public authorities
- Induction and training records
- Reports on environmental incidents, other environmental incidents non-compliances, complaints and follow-up action
- Environmental events and Investigation reports, and trends
- Environmental monitoring data (where applicable)
- Waste quantity reports and regulated waste documentation where required
- Weed Hygiene Checklists.

All environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements.

12.2. Document control

BCSF/GRS will coordinate the preparation, review and distribution, as appropriate, of the environmental management plans as well as the conditions of approval, and environmental assessment documents. During the Project, the environmental documents will be stored at the main site compound or database.

BCSF/GRS will implement a document control procedure to control the flow of documents within and between stakeholders and sub-contractors.

The procedure will also ensure that documentation is:

- Developed, reviewed and approved prior to issue
- Issued for use
- Controlled and stored for the legally required timeframe
- Removed from use when superseded or obsolete
- Archived.

A register and distribution list will identify the current revision of particular documents or data.

12.3. Access to information

As per Condition C20 of the Development Consent, BCSF must make the following information publicly available on its website as relevant to the stage of the development and keep this information up to date:

- 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 consent
- The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged
- A comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of the consent
- How complaints about the development can be made
- Any independent environmental audit, and BCSF's response to the recommendations in any audit
- Any other matter required by the Planning Secretary.

13. References

NGH. (2022a). Amendment Report – Blind Creek Solar Farm. NGH Pty Ltd.

NGH. (2022b). Environmental Impact Statement - Blind Creek Solar Farm. NGH Pty Ltd.

NGH. (2022c). Response to Submissions - Blind Creek Solar Farm. NGH Pty Ltd.

Appendix A Project Conditions of Approval

Condition No.	Condition	Where addressed?
Schedule 2 Part A Administrative Conditions		
Obligation to minimise harm to the environment		
A1	In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, upgrading, commissioning, rehabilitation or decommissioning of the development.	EMS and subplans
Terms of consent		
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 1	Section 1.1 of this EMS
A3	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: (a) any strategies, plans or correspondence that are submitted in accordance with this consent; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents.	Section 8.2.1 of this EMS
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Section 1.1 of this EMS
Upgrading of solar and ancillary infrastructure		
A5	The Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.	Section 2.3 of this EMS
Structural Adequacy		
A6	The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the *Building Code of Australia*. *Notes:* *- Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development.* *- Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.*	Section 2.3 of this EMS

Condition No.	Condition	Where addressed?
Demolition		
A7	The Applicant must ensure that all demolition work on site is carried out in accordance with *Australian Standard AS 2601-2001*: The Demolition of Structures, or its latest version.	Noted – No demolition proposed
Protection of public infrastructure		
A8	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. *Note: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.*	Section 6 of this EMS
Operation of plant and equipment		
A9	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Section 6 of this EMS SWMP
Subdivision		
A10	The Applicant may subdivide land comprising the site for the purposes of carrying out the development as generally identified in Appendix 3 and in accordance with the requirements of the EP&A Act, EP&A Regulation and the *Conveyancing Act 1919* (NSW). *Notes:* *Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision. Division 6.4 of Part 6 of the EP&A Act sets out the application requirements for subdivision certificates.*	No subdivision required.
Applicability of guidelines		
A11	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Noted
Compliance		
A12	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Section 6 and 7 of this EMS
Evidence of Consultation		

Condition No.	Condition	Where addressed?
A13	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Section 4.5 of this EMS
Part B – Environmental Conditions		
Transport		
Heavy Vehicle Restriction		
B1	The Applicant must ensure that the: (a) development does not generate more than: (i) 35 heavy vehicle movements a day during construction, upgrading and decommissioning; (ii) 22 movements of heavy vehicles requiring escort during construction, upgrading and decommissioning; and (b) length of any vehicles (excluding heavy vehicles requiring escort) used for the development does not exceed 26 metres, unless the Planning Secretary agrees otherwise	TMP
B2	The Applicant must keep accurate records of the number of heavy vehicles, and heavy vehicles requiring escort, entering or leaving the site each day for the duration of the project.	TMP
Access Route		
B3	All vehicles associated with the development: (a) approaching from the north must travel to and from the site via the Braidwood Road, Wallace Street, Goulburn Street, Bungendore Road, Tarago Road; (b) approaching from the south must travel to and from the site via Kings Highway, Molonglo Street and Tarago Road; (c) approaching from the Bungendore Sewage Treatment Plant must travel to and from the site via Bungendore Road, Molonglo Street and Tarago Road; and (d) enter the site via the approved site access point off Tarago Road, as identified in the figure in Appendix 1. *Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.*	Section 2.4 of this EMS TMP
Site Access		
B4	All vehicles associated with the development must enter and exit the site via the approved site access point off Tarago Road, as identified in Appendix 1. *Note: Other site access points may be used for emergency purposes.*	Section 2.4 of this EMS TMP
Road Upgrades		
B5	Unless the Planning Secretary agrees otherwise, prior to commencing construction, the Applicant must complete the following road upgrade treatments:	Section 2.4 of this EMS

Condition No.	Condition	Where addressed?
	(a) Tarago Road at the site access point with Basic Left turn treatment to be sealed, designed and constructed for a 100 km/h speed environment with Safe Intersection Sight Distance (SISD); and (b) extend the existing Basic Right turn treatment on Tarago Road at the site access point to comply with Figure A 28 of *the Austroads Guide to Road Design Part 4*. Unless the relevant roads authority agrees otherwise, these upgrades must comply with the *Austroads Guide to Road Design* (as amended by TfNSW supplements) and be carried out to the satisfaction of the relevant roads authority.	TMP
B6	At least three months prior to commencing construction, unless Queanbeyan-Palerang Regional Council agrees otherwise in writing, the Applicant must provide a minimum monetary contribution of $500,000 to Queanbeyan-Palerang Regional Council for road upgrade works to Tarago Road between Chainage 00 and Chainage 14,350. The contribution must be indexed with the Construction Industry Index	TMP
Road maintenance		
B7	The Applicant must: (a) undertake an independent dilapidation survey to assess the: (i) existing condition of Wallace Street, Goulburn Steet, Bungendore Road on the transport route within the Goulburn Mulwaree Local Government Area prior to construction, upgrading or decommissioning activities; and (ii) condition of Wallace Street, Goulburn Steet, Bungendore Road on the transport route within the Goulburn Mulwaree Local Government Area following construction, upgrading or decommissioning activities; (b) repair of roads identified in condition B7(a) if dilapidation surveys identify development-related damage to the road during construction, upgrading or decommissioning works in consultation with the relevant road authority, to the satisfaction of the Planning Secretary. If there is a dispute about road repair between the applicant and the relevant roads authority, then either party may refer the matter to the Planning Secretary for resolution.	TMP
Operating Conditions		
B8	The Applicant must ensure: (a) the internal roads are constructed as all-weather roads; (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.	TMP
Traffic Management Plan		
B9	Prior to commencing the road upgrades identified in condition B5 of this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW, Queanbeyan-Palerang Regional Council and Goulburn Mulwaree Council and to the satisfaction of the Planning Secretary. This plan must include: (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition B5 of this consent; (c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:	TMP

Condition No.	Condition	Where addressed?
	(i) details of the dilapidation surveys required by condition B7 of this consent; (ii) temporary traffic controls, including detours and signage; (iii) notifying the local community about project-related traffic impacts; (iv) procedures for receiving and addressing complaints from the community about development related traffic; (v) minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network; (vi) minimising potential cumulative traffic impacts with other projects in the area during construction, upgrading or decommissioning works (vii) minimising dirt tracked onto the public road network from development-related traffic; (viii) encouraging car-pooling or ride sharing by employees; (ix) scheduling of heavy vehicle movements to minimise convoy length or platoons, and to minimise conflict with light vehicles; (x) responding to local climate conditions that may affect road safety such as fog, dust, wet weather; (xi) responding to any emergency repair or maintenance requirements; and (xii) a traffic management system for managing heavy vehicles requiring escort; (d) a driver's code of conduct that addresses: (i) driver fatigue; (ii) procedures to ensure that drivers adhere to the designated transport routes and speed limits; and (iii) procedures to ensure that drivers implement safe driving practices; and (e) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan. (f) a flood response plan detailing procedures and options for safe access to and from site in the event of flooding. Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.	
Landscaping		
Vegetation buffer		
B10	The Applicant must establish and maintain a vegetation buffer (landscape screening) as per the draft landscape plan in Appendix 5. The landscape screening must: (a) be planted prior to commencing operation; (b) minimise views of the development from the north, south and west; (c) be comprised of species that are endemic to the area; (d) designed and maintained in accordance with RFS's Planning for Bushfire Protection 2019 (or equivalent); and (e) be properly maintained with appropriate weed management, unless the Planning Secretary agrees otherwise.	LP
Landscaping Plan		
B11	Prior to commencing the development, the Applicant must prepare a detailed Landscaping Plan for the development to the satisfaction of the Planning Secretary. This plan must include: (a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition B10 (a) – (e) above; (b) a program to monitor and report on the effectiveness of these measures; (c) details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions; and Following the Planning Secretary's approval, the Applicant must implement the	LP

Condition No.	Condition	Where addressed?
	Landscaping Plan.	
Land Management		
B12	The Applicant must maintain the agricultural land capability of the site, including: (a) establishing the ground cover of the site within 3 months following the completion of any construction or upgrading; (b) properly maintaining the ground cover with appropriate perennial species and weed management; and (c) maintaining grazing within the development footprint, where practicable, unless the Planning Secretary agrees otherwise.	LP
Biodiversity		
Vegetation Clearance		
B13	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS and must not impact areas of EEC during the construction, operations and decommissioning of the project.	Section 2.2 of this EMS BMP
Biodiversity Management Plan		
B14	Prior to carrying out any development that could directly or indirectly impact the biodiversity values, 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) be prepared in accordance with the Biodiversity Development Assessment Report (dated 23 September 2022); (b) include a description of the measures that would be implemented for: (i) establishing a minimum of 33.86 hectares of suitable breeding habitat for the White-fronted Chat; (ii) protecting vegetation and fauna habitat outside the approved disturbance areas; (iii) avoiding areas of EEC; (iv) enabling the movement of native fauna into and out of the development site; (v) managing the remnant vegetation and fauna habitat on site; (vi) minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; (vii) minimising the impacts to fauna on site and implementing fauna management protocols; (viii) avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; (ix) rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site's ecology and conditions; (x) 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 (xi) controlling weeds, feral pests and pathogens; (c) include a program to monitor and report on the effectiveness of mitigation measures and report to BCS following each annual reporting window; (d) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site; and (e) include details of who would be responsible for monitoring, reviewing and implementing the plan.	BMP

Condition No.	Condition	Where addressed?
	Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.	
Amenity		
Construction, Upgrading and Decommissioning Hours		
B15	Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between: (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and (c) at no time on Sundays and NSW public holidays. The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary: • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; and • emergency work to avoid the loss of life, property and/or material harm to the environment.	Section 2.7 of this EMS
Noise		
B16	The Applicant must: (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the *Interim Construction Noise Guideline* (DECC, 2009) or its latest version; and (b) ensure that the noise generated by the operation of the development during the night does not exceed 35 dB(A) LAeq, 15min to be determined in accordance with the procedures in the *NSW Noise Policy for Industry* (EPA, 2017) at any non-associated residence.	Section 6 of this EMS
Dust		
B17	The Applicant must minimise the dust generated by the development.	SWMP
Visual		
B18	The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	LP
Lighting		
B19	The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: (i) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; and (iii) complies with *Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting*, or its latest version.	LP
Heritage		

Condition No.	Condition	Where addressed?
Protection of Heritage items		
B20	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 4 or any Aboriginal heritage items located outside the approved development footprint. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 4, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Heritage Management Plan required in condition B21.	HMP
Heritage Management Plan		
B21	Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary in writing; (b) be prepared in consultation with Aboriginal Stakeholders and Heritage NSW; (c) include a description of the measures that would be implemented for: (i) protecting the Aboriginal heritage items identified in Table 1 in Appendix 4 or items located outside of the approved development footprint, including fencing off the Aboriginal heritage items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 4; (ii) salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 4; (iii) a contingency plan and reporting procedure if: (iv) previously unidentified heritage items are found; or (v) Aboriginal skeletal material is discovered (vi) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; (vii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.	HMP
Soil and Water		
Water Supply		
B22	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. *Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain any necessary water licences for the development.*	SWMP
Water Pollution		
B23	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	SWMP
Operating Conditions		
B24	The Applicant must: (a) minimise any soil erosion and control sediment generation;	SWMP

Condition No.	Condition	Where addressed?
	(b) ensure any solar panels and ancillary infrastructure and any other land disturbance associated with the construction, upgrading or decommissioning of the development have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the *Managing Urban Stormwater: Soils and Construction* (Landcom, 2004) manual, or its latest version; (c) ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site; (d) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and (e) ensure all works are undertaken with the following, unless DPE Water agrees otherwise: (i) *Guidelines for Controlled Activities on Waterfront Land* (NRAR, 2018), or its latest version; (ii) *Policy and Guidelines for Fish Habitat Conservation and Management* (2013), or its latest version; and (iii) *DPI Fisheries Policy and Guidelines for Fish Friendly Water Crossings* (2004) and *Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings* (2004).	
Soil and Water Management Plan		
B25	Prior to commencing construction, the Applicant must prepare a Soil and Water Management Plan for the development in consultation with DPE Water. This plan must: (a) be prepared by suitably qualified and experienced persons; (b) include a description of the measures that would be implemented to ensure that the objectives of condition B24 (a) – (e) above are achieved; (c) include a program to monitor and report on the effectiveness of these measures; and (d) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. Prior to commencing construction, the Applicant must implement the Soil and Water Management Plan.	SWMP
Hazards		
Fire Safety Study		
B26	Prior to commencing construction of the battery storage facility, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary in writing. The study must: (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; (b) describe the final design of the battery storage; (c) include reasonable worst-case fire scenario to and from the battery storage and the associated fire management; and (d) identify measures to eliminate the expansion of any fire incident including: (i) adequate fire safety systems and appropriate water supply; (ii) separation and / or compartmentalisation of battery units; and (iii) strategies and incident control measures specific to the battery storage design. Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study. *Note: 'to the satisfaction of FRNSW' above means confirmation in writing from FRNSW that the Study meets the requirements of FRNSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline.*	FSS
Storage and Handling of Dangerous Materials		

Condition No.	Condition	Where addressed?
B27	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Handbook* if the chemicals are liquids. In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.	SWMP
Operating Conditions		
B28	The Applicant must: (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development: (i) complies with the relevant asset protection requirements in the RFS's *Planning for Bushfire Protection 2019* (or equivalent) and Standards for Asset Protection Zones; and (ii) is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank, fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection; (c) ensure that the development, including battery storage area: (i) includes a 10 metre defendable space around the perimeter that permits unobstructed vehicle access assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (ii) is managed as an asset protection zone (including the defendable space); (d) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (e) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.	BFMP
Emergency Plan		
B29	Prior to commencing commissioning, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, and provide a copy of the plan to the local Fire Control Centre and FRNSW. The plan must: (a) be prepared in accordance with the findings of the Fire Safety Study required under Condition B26 of Schedule 2; (b) be consistent with Department's Hazardous Industry Planning Advisory Paper No. 1, '*Emergency Planning*' and RFS's *Planning for Bushfire Protection 2019* (or equivalent); (c) include details on how the battery storage and sub-systems can be safely isolated in an emergency; (d) include fire emergency management planning, including: (i) details of the location, management and maintenance of the Asset Protection Zone; (ii) a list of works that must not be carried out during a total fire ban; (iii) details of how RFS would be notified, and procedures that would be implemented in the event that: ▪ there is a fire on-site or in the vicinity of the site; ▪ there are any activities on site that would have the potential to ignite surrounding vegetation; or ▪ there are any proposed activities to be carried out during a bushfire danger period; (e) detail specific response measures in the case of flood to ensure site safety; (f) describe the specific emergency exit routes to be used in the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriageway); and (g) include an Emergency Services Information Package in accordance with	ERP

Condition No.	Condition	Where addressed?
	Emergency services information package and *tactical fire plan* (FRNSW, 2019), to the satisfaction of FRNSW and RFS.	
B30	The Applicant must: (a) implement the Emergency Plan and Emergency Services Information Package for the duration of the development; and (b) following commencement of commissioning of the battery storage, keep a copy of the Emergency Plan and Emergency Services Information Package on-site in a prominent position adjacent to the site entry points at all times.	ERP
Waste		
B31	The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's *Waste Classification Guidelines 2014* (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.	Section 6
Accommodation And Employment Strategy		
B32	Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Queanbeyan-Palerang Regional Council. This strategy must: (a) propose measures to ensure there is sufficient accommodation for the workforce associated with the development; (b) consider the cumulative impacts associated with other State significant development projects in the area; (c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and (d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction, and implement the plan throughout construction.	AES
Decommissioning And Rehabilitation		
B33	Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 1. *Table 1: Rehabilitation Objectives* **Feature** / **Objective** Site: • 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 and ancillary infrastructure: • To be decommissioned and removed, unless the Planning Secretary agrees otherwise Land use: • Restore land capability to pre-existing productive	NA – Decommissioning

Condition No.	Condition	Where addressed?
	<table><tr><td></td><td>capacity</td></tr><tr><td>Community</td><td>• Ensure public safety at all times.</td></tr></table>	
Part C Environmental Management, Reporting And Auditing		
Environmental Management		
Environmental Management Strategy		
C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (c) provide the strategic framework for environmental management of the development; (d) identify the statutory approvals that apply to the development; (e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (f) set out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and (g) include: (iv) references to any strategies, plans and programs approved under the conditions of this consent; and (v) a clear plan depicting all the monitoring to be carried out in relation to the development including a table summarising all the monitoring and reporting obligations under the conditions of this consent. Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	This Plan
Revision of Strategies, Plans and Programs		
C2	The Applicant must: (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 (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: (i) submission of an incident report under condition C10 of Schedule 4; (ii) submission of an audit report under condition C14 of Schedule 4; or (iii) any modification to the conditions of this consent.	Section 11.1 of this EMS Note; condition is incorrect and should refer to C10 of Schedule *2* and C14 of Schedule *2*

Condition No.	Condition	Where addressed?
Staging, Combining and Updating Strategies, Plans or Programs		
C3	With the approval of the Planning Secretary, the development may be staged and the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	Section 11.2 of this EMS
C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Section 11.2 of this EMS
C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Section 11.2 of this EMS
C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Section 11.2 of this EMS
Notifications		
Notification Of Department		
C7	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	Section 8.2.1 of this EMS
Final Layout Plans		
C8	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure. The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.	Final layout plans
Work as Executed Plans		
C9	Prior to commencing operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development showing comparison to the final layout plans to the Department via the Major Projects website and Queanbeyan-Palerang Regional Council.	Executed Plans
Incident Notification		

Condition No.	Condition	Where addressed?
C10	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 6.	Section 10.4.1 of this EMS
Non-Compliance Notification		
C11	The Department must be notified via the Major Projects website portal within seven days after the Applicant becomes aware of any non-compliance.	Section 10.4.1 of this EMS
C12	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.	Section 10.4.1 of this EMS
C13	A non-compliance which has been notified as an incident does not need to also be notified as a non- compliance	Section 10.4.1 of this EMS
Independent Environmental Audit		
C14	Independent Audits of the development 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 10.3.2 of this EMS
C15	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 10.3.2 of this EMS
C16	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition C14 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant at the date upon which the audit must be commenced.	Section 10.3.2 of this EMS
C17	In accordance with the specific requirements in *the Independent Audit Post Approval Requirements* (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C14 of Schedule 4 of this consent, or condition C16 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 10.3.2 of this EMS
C18	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 *Independent Audit Post Approval Requirements* (2020) unless otherwise agreed by the Planning Secretary	Section 10.3.2 of this EMS
C19	Notwithstanding the requirements of the *Independent Audit Post Approval Requirements* (2020), 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 10.3.2 of this EMS

Condition No.	Condition	Where addressed?
Access To Information		
C20	The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent; (v) the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; (vi) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; (vii) how complaints about the development can be made; (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (ix) any other matter required by the Planning Secretary; and (b) keep this information up to date	Section 12.3 of this EMS

Appendix B Environmental Legislation Register

Act	Activity / aspect	Requirement	Reference	Applicability
General				
Protection of the Environment Operations Act 1997.	Harming the environment.	Do not risk harming the environment by wilfully or negligently: disposing of waste unlawfully causing any substance to leak, spill or otherwise escape (whether or not from a container); or emitting an ozone depleting substance. The works do not trigger the requirement of Environmental Protection Licence under schedule 1.	S115 S116 S117	Yes
Protection of the Environment Operations Act 1997.	Notification of Pollution incidents.	Notify the EPA, NSW Ministry of Health via local Public Health Unit, Safe Work NSW, Local authority and Fire and Rescue NSW immediately of pollution incidents where material harm to the environment is caused or threatened.	S148	Yes
Dangerous Goods (Road and Rail Transport) Act 2008.	Hazards and risks.	Ensure that dangerous goods are transported in a safe manner.	S9	Yes
Pesticides Act 1999.	Hazards and risks.	Use pesticides in an environmentally sensitive manner. Do not use an unregistered pesticide without a permit. Read the label or permit for the pesticide. Use registered pesticides in accordance with instructions on the label. Do not use any restricted pesticide unless authorised by a certificate of competency or a pesticide control order under the Act. Compliance with pesticide codes of practice is required.	S12 S13 S14 S15 S17	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
National Greenhouse and Energy Reporting Act, 2007 and Regulations 2008.	Greenhouse gas emissions.	Accounting and reporting of greenhouse gases produced, and energy consumed during construction. Applicability dependent on thresholds.	-	No Due to the relatively low scale of the project and the estimated energy consumption and emissions associated with diesel use, the thresholds for mandatory reporting under the National Greenhouse and Energy Reporting (NGER) Act 2007 are not expected to be triggered.
Privacy and Personal Information Protection Act 1998 (NSW).	Community Liaison.	Legislation relevant to community liaison.	-	Yes
Environmental Planning and Assessment Act 1979.	All	Comply with approved conditions.	Part 4, s4.10	Yes
Water				
Water Management Act 2000. With the exception of	Water access and use.	Do not take water from a water source (a lake, river or estuary or place where water occurs naturally on or below the surface of the ground and includes coastal waters) without an access licence. Do not use of water on land (unless supplied by a water utility,	S56 S60A	The EIS identify that controlled activity approvals are not required as most

Act	Activity / aspect	Requirement	Reference	Applicability
controlled activity approvals, the *Water Management Act 2000* (WM Act) only applies in relation to those water sources covered by operational water sharing plans – these areas cover most of the State's major regulated river systems.		irrigation corporation etc. or in accordance with basic landholder rights) without a water use approval.	S89 S 89 S91A	Projects are exempt as the work is being undertaken by or on behalf of a public authority.
Protection of the Environment Operations Act 1997.	Water pollution	Do not cause water pollution.	S120 S122	Yes
Noise				
Protection of the Environment Operations Act 1997.	Plant maintenance and operation.	Do not operate plant if it emits noise caused by poor maintenance or operation.	S139	Yes
Protection of the Environment Operations Act 1997.	Materials management.	Do not cause noise by failing to properly and efficiently deal with materials.	S140	Yes
Contaminated soil				
Protection of the Environment Operations Act 1997.	Land pollution.	Do not cause or permit land pollution other than under authority of a licence or regulation (However it is not a land pollution offence to place virgin excavated natural material or lawful pesticides and fertilisers on land, or by placing matter on land that has been notified to the EPA as an unlicensed landfill and which is operated in accordance with the regulations.)	S142A – S142E	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
Contaminated Land Management Act 1997.	Reporting contamination.	Notify the EPA if contaminants exceed thresholds contained in guidelines or the regulations where contamination has entered or will foreseeably enter neighbouring land, the atmosphere, groundwater or surface water. Contaminants in soil are equal to or exceed guideline levels with respect to the current or approved use of the land. Contamination meets other criteria that may be prescribed by the regulations.	S60	Yes
Biodiversity				
Biosecurity Act 2015.	Weed, pest and disease control.	The duty to prevent, eliminate and minimise biosecurity risks posed by biosecurity matters as defined by the Act.	s22 Schedule 1	Yes
Biosecurity Regulation 2017.	Pests and diseases.	Notify the presence any pest or disease listed in Schedule 1 of the Biosecurity Regulation 2014, within 1 working day after suspecting or becoming aware of the pest or disease.	cl. 7, Schedule 1	Yes
Biodiversity Conservation Act 2016.	Threatened flora and fauna.	Do not harm any animal that is; of a threatened species, that is part of a threatened ecological community or is a protected animal, unless authorised under other legislation (e.g. planning approval). Do not damage habitat of a threatened species or ecological community unless authorised under other legislation (e.g. planning approval). Do not damage declared areas of outstanding biodiversity value unless authorised under other legislation (e.g. planning approval). Do not pick a plant that is; of a threatened species, that is part of a threatened ecological community or is a protected plant, unless authorised under other legislation (e.g. planning approval).	S2.1-2.4 S2.8	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
Fisheries Management Act 1994.	Mangroves, seagrasses and marine vegetation.	Do not harm any mangroves, seagrasses or other marine vegetation on public water land protected by the regulations without a permit.	S205	No
Fisheries Management Act 1994.	Fish passage.	Do not block fish passage without a permit.	S219	No, Project is exempt
Environment Protection Biodiversity Conservation Act 1999 (Commonwealth).	Flora and fauna conservation.	Comply with the terms of any EPBC Act approval for the Project.	N/A	Not applicable to this Project as EPBC Approval not required to be obtained.
Waste				
Protection of the Environment Operations Act 1997.	Littering.	Do not litter in a public place or an open private place. Do not litter from a vehicle. Only deposit advertising material in receptacles provided for mail or newspapers or under the door of the premises. Do not deposit advertising material on or in vehicles.	Part 5.6A	Yes
Protection of the Environment Operations Act 1997.	Waste and transportation.	Do not undertake a scheduled waste activity unless in accordance with an environment protection licence. Refer also to the Resource Recovery Exemptions.	Part 3.2 Schedule 1	Yes
		Only transport waste to a facility that can lawfully accept the waste within 150 km from Project.	S143	Yes
		Do not dispose of waste in a manner that harms or is likely to harm the environment.	S115	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
Protection of the Environment Operations (Waste) Regulation 2014.	Waste and transportation.	Comply with general requirements for the transport of waste. For example, any vehicle used by the person to transport waste must be kept in a clean condition and be maintained so as to prevent spillage of waste. For some wastes only licensed transporters can be used.	Regulation cl.49	Yes
	Comply with record keeping requirements in relation to the transport of certain types of waste.	Regulation Part 3.	Yes	Comply with record keeping requirements in relation to the transport of certain types of waste.
Heritage				
Heritage Act 1977.	Heritage.	Do not undertake an activity that will affect a place, building, work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.	S56-57	Yes
		Do not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or Do not disturb or excavate land on where a relic has been discovered or exposed unless an excavation permit in place.	S139	No
		Notify the heritage Council on discovery of a relic.	S146	Yes
		Give the Heritage Council at least 14 days' notice before removing or demolishing any item listed in a section 170 register.	S170A	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
National Parks and Wildlife Act 1974.	Aboriginal places and objects.	Do not harm or desecrate an Aboriginal object or Aboriginal place without consent.	S86 S90	Yes
	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	S89A	Yes	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth).	Protection of areas and objects.	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	S20	Yes
	Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.		S22	Yes Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.

Appendix C GRS Environmental Policy

GRANSOLAR GROUP

ENVIRONMENTAL AND ENERGY MANAGEMENT POLICY

DOC Nº: GGR-HS-POL-0001
REVISION: A2
DATE: 17/12/2024

PUBLIC

Title	Environmental and Energy Management Policy
Scope of application	All companies in the Gransolar Group, as well as other companies with effective control
Category	Policy
Elaborated by	HSE and CSR Department
Date of approval	17/12/2024
Approved by	Board of Directors of Gransolar Group, S.L.
Version substituted	Environmental Policy V1 (13/03/2024) Energy Management Policy V1 (24/07/2024) Environmental and Health and Safety Policy PVH V1 (13/12/2023)
New version	A2
Use	PUBLIC

Revision history

Revision	Date (dd-mm-aa)	Elaborated by	Changes made	Reviewed by
V1	13/03/2024 24/07/2024 13/12/2023	HSE and CSR department	Issued for information and update	Board of Directors of Gransolar Group, S.L.
A2	17/12/2024	HSE and CSR department	Policy unification	Governance Dpt.

Approvals

This document has been approved by

Name	Version
BoD (13/03/2024 - 24/07/2024-13/12/2023)	V1
BoD (17/12/2024)	A2

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1. Introduction 3
2. Aim & Purpose 3
3. Application scope 4
4. General Principles 4
5. Flow chart and Responsible Parties 5
6. Communication and Awareness-raising 5
7. Review and update process 5

*The Board of Directors of **Gransolar Group, S.L.** (hereinafter, **'Gransolar'**), as part of its general and non-delegable power to develop and approve the general policies and strategies of the company, has approved this Policy (hereinafter, the **'Policy'**).*

1. Introduction

At Gransolar we see policies and procedures as fundamental within our organization, as they ensure compliance with rules and regulations, provide clear guidance on how to carry out different tasks and simplify internal processes.

At Gransolar we base our management on excellence, responding to the needs of our stakeholders, contributing value to society, and seeking social, economic and environmental sustainability. As Participating Members of the United Nations Global Compact, we promote the Sustainable Development Goals, assuming our role as an agent of change in terms of sustainability. Furthermore, Gransolar defends the recognition of Human Rights, adopting a defensive position in the face of possible violations in the territories where we operate, extending our Whistleblowing Channel to all our Stakeholders, updated in accordance with Directive EU 2019/1937 and Law 02/2023, in order to adopt standards of anonymity and confidentiality.

Furthermore, Gransolar is committed to the highest standards of transparency and accountability, following a zero-tolerance policy towards any conduct contrary to what is set out in our Corporate Policies and extending these commitments to all our stakeholders. This commitment, integrated in all its internal rules, is based on a corporate culture firmly rooted in the sustainability of the business model and extends to all the Group's operations and value chain.

Gransolar is convinced of its role as a leading agent of change. This is why we have adopted an 'early adopter' culture in relation to the new regulations recently approved by the EU, as well as the indications, guidelines, and recommendations of recognized international bodies.

2. Aim & Purpose

Gransolar is committed to protecting the environment, promoting energy efficiency, the responsible use of resources, and applying the principles of the circular economy in the design, procurement, use of raw materials, manufacturing of equipment, and the construction and management of its projects, as well as in the management of generated waste, pollution prevention, and the conservation of the natural environment and biodiversity.

Gransolar recognizes that the environment is everyone's responsibility and is committed to working with all its staff to ensure the management and protection of the environment in all its activities.

3. Application scope

This policy applies to all companies, workplaces, and business units of Gransolar, regardless of their geographical location or activity.

Senior Management formally adopts its commitment to the principles developed in this Policy, which concerns all employees and the different levels of the Group, including the dissemination of this policy to the stakeholders and contractors who carry out activities for the organization.

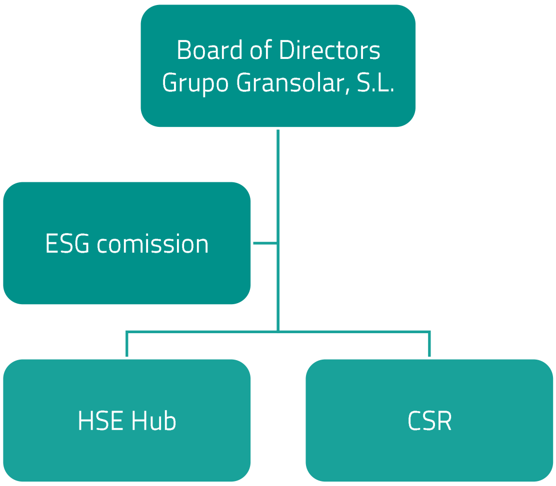
4. General Principles

Gransolar Group is committed to:

- Complying with or exceeding environmental and energy legislation and other requirements, such as those of clients and other stakeholders, approved codes of practice, industry standards, and/or guidelines.
- Leading environmental programs from the Board of Directors, with the management team of each business line being responsible for their implementation within their scope of action.
- Integrating the principles of environmental protection and conservation, and efficient energy management into Gransolar' s key processes at all levels and operations.
- Promoting energy efficiency in our processes and projects, as well as offering our clients accessible, innovative, and sustainable solutions, products, and energy, thus contributing to the reduction of the carbon footprint.
- Driving the sustainable management of different energy sources, advancing the use of energy from renewable sources, and preventing actions that may generate negative energy impacts in Gransolar' s activities.
- Promoting efficiency and excellence in internal management with the implementation of an environmental management system that integrates economic, technical, social, energy, and environmental aspects, with a permanent search for continuous improvement.
- Promoting a collaborative and proactive approach to environmental management and energy efficiency that involves the commitment of all employees, suppliers, and other stakeholders to prevent possible incidents that may impact the environment.
- Ensuring that sufficient resources are available for the company to achieve its environmental and energy objectives and goals, and that this policy is implemented.
- Promoting the acquisition of energy-efficient products and services and supporting design activities that consider the improvement of energy performance.
- Fostering the application of circular economic principles by optimizing natural resources and raw materials, minimizing waste generation, and managing waste in a way that prioritizes reuse or recycling.
- Protecting and conserving biodiversity in such a way that minimizes environmental impacts on ecosystems that may be affected by our operations.

- Identifying opportunities for continuous improvement of Gransolar' s Environmental Management System by using appropriate objectives and indicators to periodically measure and control risks and their performance.

5. Flow chart and Responsible Parties



6. Communication and Awareness-raising

This Policy will be published on the Gransolar Intranet and on the various websites of the Group's companies, so that it can be known and consulted by all staff and the company's various stakeholders.

7. Review and update process

The HSE and CSR Area, together with the ESG Committee, will periodically review and update the content of this Policy within a period not exceeding three years, and will propose to the Board of Directors any modifications that contribute to its development and continuous improvement.

GRANSOLAR GROUP

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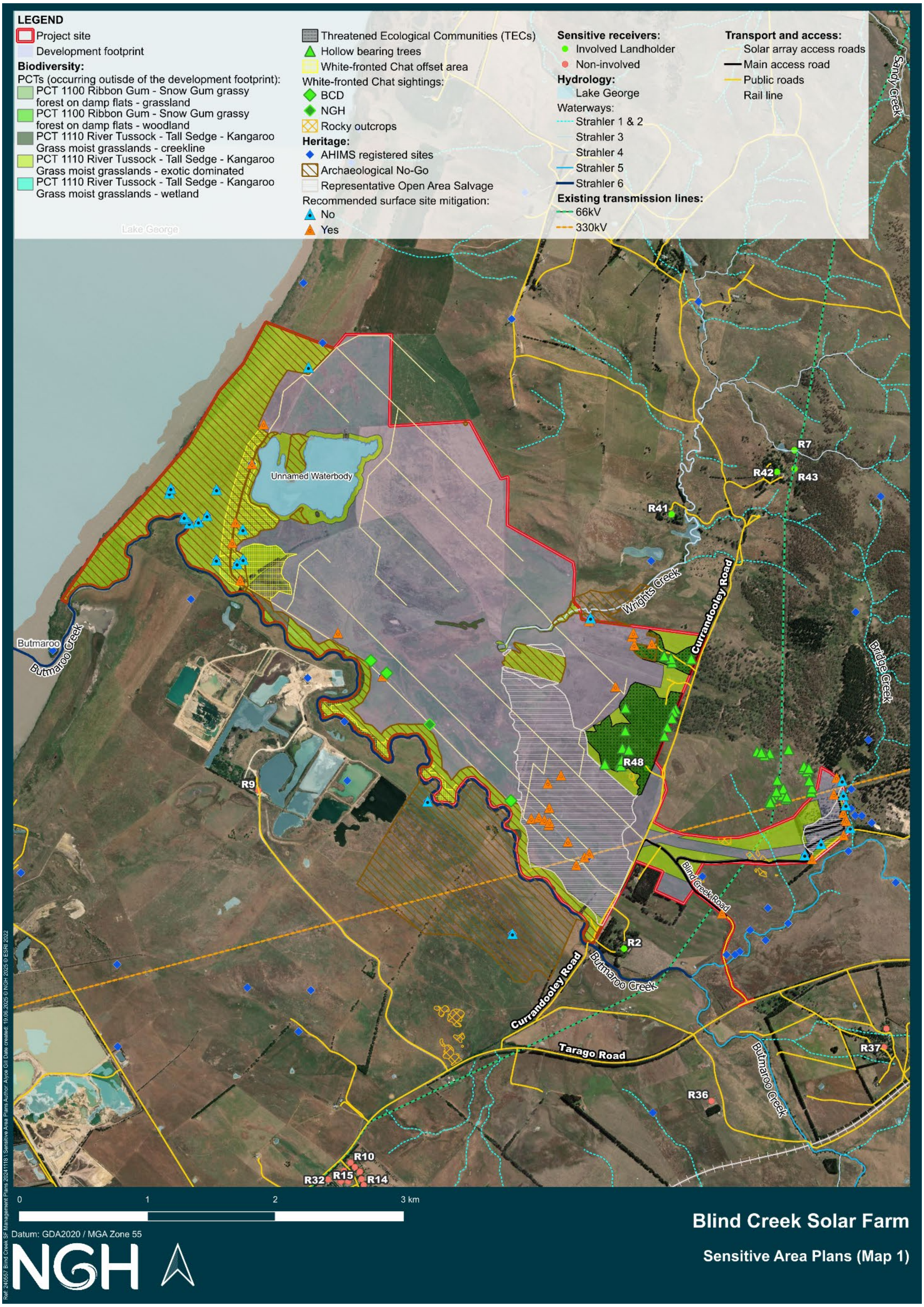
Appendix D Sensitive Area Plans


LEGEND
Project site
Development footprint
Biodiversity:
PCTs (occurring outisde of the development footprint):
PCT 1100 Ribbon Gum - Snow Gum grassy forest on damp flats - grassland
PCT 1100 Ribbon Gum - Snow Gum grassy forest on damp flats - woodland
PCT 1110 River Tussock - Tall Sedge - Kangaroo Grass moist grasslands - creekline
PCT 1110 River Tussock - Tall Sedge - Kangaroo Grass moist grasslands - exotic dominated
PCT 1110 River Tussock - Tall Sedge - Kangaroo Grass moist grasslands - wetland
Threatened Ecological Communities (TECs)
Hollow bearing trees
White-fronted Chat offset area
White-fronted Chat sightings:
BCD
NGH
Rocky outcrops
Heritage:
AHIMS registered sites
Archaeological No-Go
Representative Open Area Salvage
Recommended surface site mitigation:
No
Yes
Sensitive receivers:
Involved Landholder
Non-involved
Hydrology:
Lake George
Waterways:
Strahler 1 & 2
Strahler 3
Strahler 4
Strahler 5
Strahler 6
Existing transmission lines:
66kV
330kV
Transport and access:
Solar array access roads
Main access road
Public roads
Rail line
Sandy Creek
Unnamed Waterbody
Wrights Creek
Currandooley Road
Butmaroo
Butmaroo Creek
Bridge Creek
Blind Creek Road
Tarago Road
R2
R7
R9
R10
R14
R15
R32
R36
R37
R41
R42
R43
R48
0
1
2
3 km
Datum: GDA2020 / MGA Zone 55
NGH
Blind Creek Solar Farm
Sensitive Area Plans (Map 1)


LEGEND
Project site
Development footprint
Biodiversity:
PCTs (occurring outisde of the development footprint):
PCT 1110 River Tussock - Tall Sedge - Kangaroo Grass moist grasslands - creekline
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Recommended surface site mitigation:
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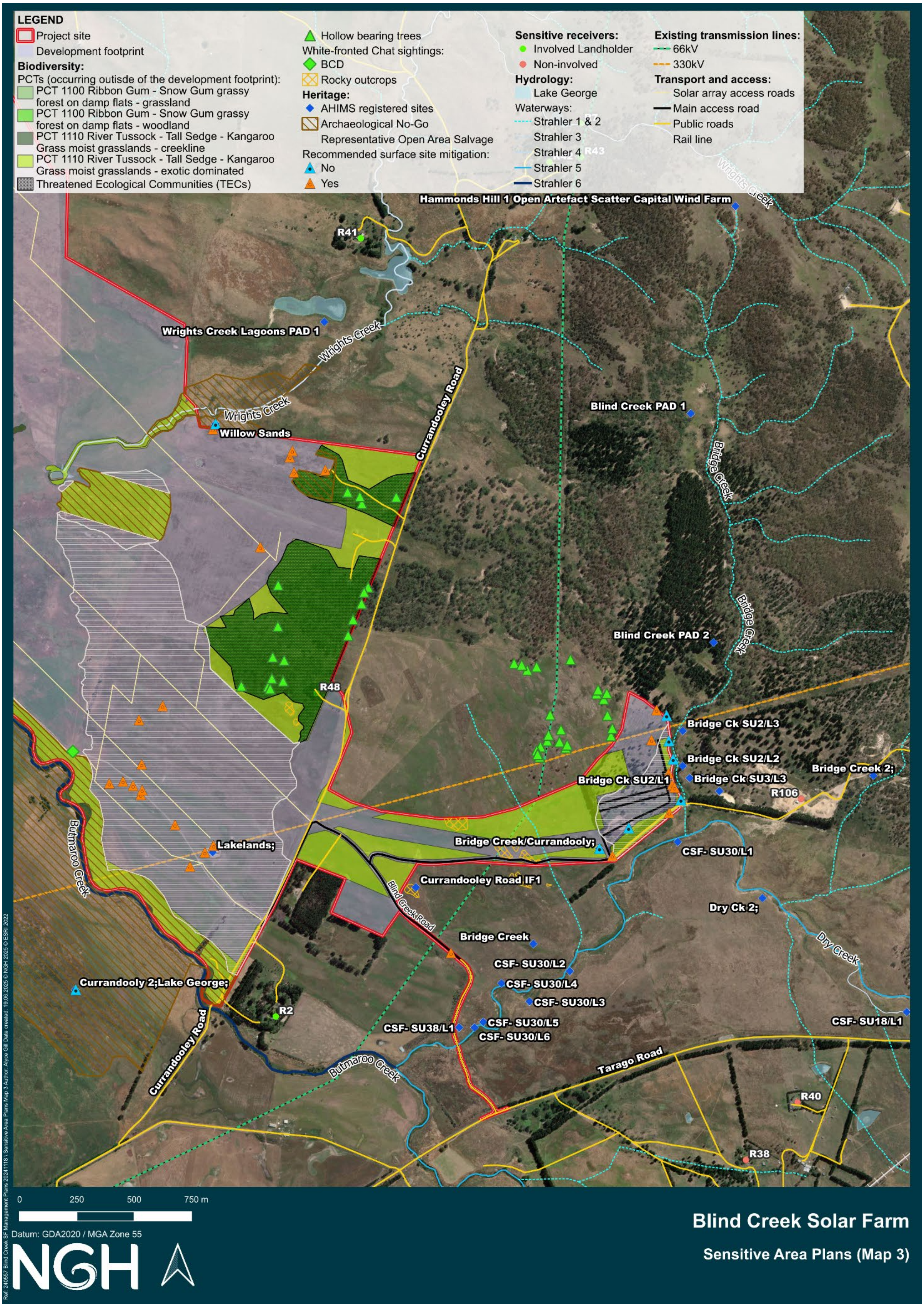
Sensitive receivers:
Non-involved
Hydrology:
Lake George
Waterways:
Strahler 1 & 2
Strahler 4
Strahler 6
Transport and access:
Solar array access roads
Public roads
CWF2-S-06
Lake George
CWF-AD-4
CWF2-IF-05
CWF2-IF-07
Unnamed Waterbody
CWF2-S-04
CWF2-IF-02
CWF2-IF-04
CWF2-S-05
CWF2-IF-01
CWF2-S-03
CWF2-S-02
Butmaroo Creek
CWF2-S-01
CWF2-IF-08
CWF2-IF-03
Butmaroo Creek
Wood Duck PAD 1
Butmaroo
South Red Hill Strandline PAD1
Butmaroo Creek
Bungendore Sands;
West Creek Dairy PAD 1
Grantham Park 2
Grantham Park 1
Grantham Park 3
R9
0
250
500
750 m
Datum: GDA2020 / MGA Zone 55
NGH
Blind Creek Solar Farm
Sensitive Area Plans (Map 2)


LEGEND
Project site
Development footprint
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BCD
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Strahler 4
Strahler 5
Strahler 6
Existing transmission lines:
66kV
330kV
Transport and access:
Solar array access roads
Main access road
Public roads
Rail line
Hammonds Hill 1 Open Artefact Scatter Capital Wind Farm
R41
Wrights Creek Lagoons PAD 1
Wrights Creek
Currandooley Road
Willow Sands
Blind Creek PAD 1
Bridge Creek
Blind Creek PAD 2
R48
Bridge Ck SU2/L3
Bridge Ck SU2/L2
Bridge Creek 2;
Bridge Ck SU3/L3
Bridge Ck SU2/L1
R106
Butmaroo Creek
Lakelands;
Bridge Creek/Currandooly;
CSF- SU30/L1
Currandooley Road IF1
Blind Creek Road
Dry Ck 2;
Dry Creek
Bridge Creek
CSF- SU30/L2
Currandooly 2;Lake George;
CSF- SU30/L4
CSF- SU30/L3
R2
CSF- SU38/L1
CSF- SU30/L5
CSF- SU30/L6
CSF- SU18/L1
Tarago Road
R40
R38
0 250 500 750 m
Datum: GDA2020 / MGA Zone 55
NGH
Blind Creek Solar Farm
Sensitive Area Plans (Map 3)

NGH

NGH Pty Ltd

NSW • ACT • QLD • VIC

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