

**Whitehaven
Solar Farm Project**

Environmental Impact Statement



WHITEHAVEN COAL

EXECUTIVE SUMMARY

This document is an Environmental Risk Assessment (ERA) prepared for the Whitehaven Solar Farm Project (the Project), located adjacent to the existing Narrabri Mine.

The Project would involve approximately 26 megawatts (MW) direct current or 20 MW alternating current of solar electricity generation. The Project would provide behind-the-meter electricity supply to the Narrabri Mine via the existing 66 kilovolt electricity transmission line.

The ERA identifies environmental issues and ranks these issues in consideration of control measures. The most significant environmental risks identified by this ERA includes the following environmental aspects:

- Water Resources.
- Aboriginal Cultural Heritage.
- Biodiversity.

These issues will be covered in detail in the specialist assessment reports to be appended to the Project Environmental Impact Statement, including:

- Appendix A Biodiversity Development Assessment Report.
- Appendix B Aboriginal Cultural Heritage Assessment.
- Appendix C Agricultural Impact Assessment.
- Appendix D Landscape and Visual Assessment.
- Appendix E Road Transport Assessment.
- Appendix F Glint and Glare Assessment.
- Appendix G Water Resources Assessment.
- Appendix H Land Contamination Assessment.
- Appendix I Social Impact Assessment.
- Appendix J Noise Impact Assessment.
- Appendix K ERA.

The review team risk ranked the key environmental issues and concluded that risks are 'As Low as Reasonably Practical', or lower.

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1 INTRODUCTION

This document is an Environmental Risk Assessment (ERA) prepared for the Whitehaven Solar Farm Project (the Project), a proposed solar farm which would include approximately 26 megawatts (MW) direct current (DC) or 20 MW alternating current (AC) of solar electricity generation and the construction of a 10 Megawatt Hour DC Battery Energy Storage System (BESS).

The Project is located approximately 25 kilometres (km) south-east of Narrabri and approximately 60 km north-west of Gunnedah, within the Narrabri Shire Council Local Government Area, in the New England North West region of New South Wales (NSW) (Figure 1).

The Project is proposed by Whitehaven Energy Pty Ltd (Whitehaven Energy), a wholly owned subsidiary of Whitehaven Coal Limited (Whitehaven Coal).

The Project would be located adjacent to the existing Narrabri Mine which is operated by Narrabri Coal Operations Pty Ltd (NCOPL), on behalf of the Narrabri Mine Joint Venture. The Project would provide behind-the-meter electricity supply to the Narrabri Mine via the existing 66 kilovolt (kV) electricity transmission line (ETL).

At the Narrabri Mine, NCOPL is currently receiving carbon neutral energy from sources outside of the Mine site. The Project would provide lower cost renewable energy to the Narrabri Mine and hence would facilitate electricity production resulting in minimal greenhouse gas emissions.

1.1 OBJECTIVE AND SCOPE

The objective of this ERA is to conduct a risk assessment consistent with the Project Secretary's Environmental Assessment Requirements (SEARs), which require:

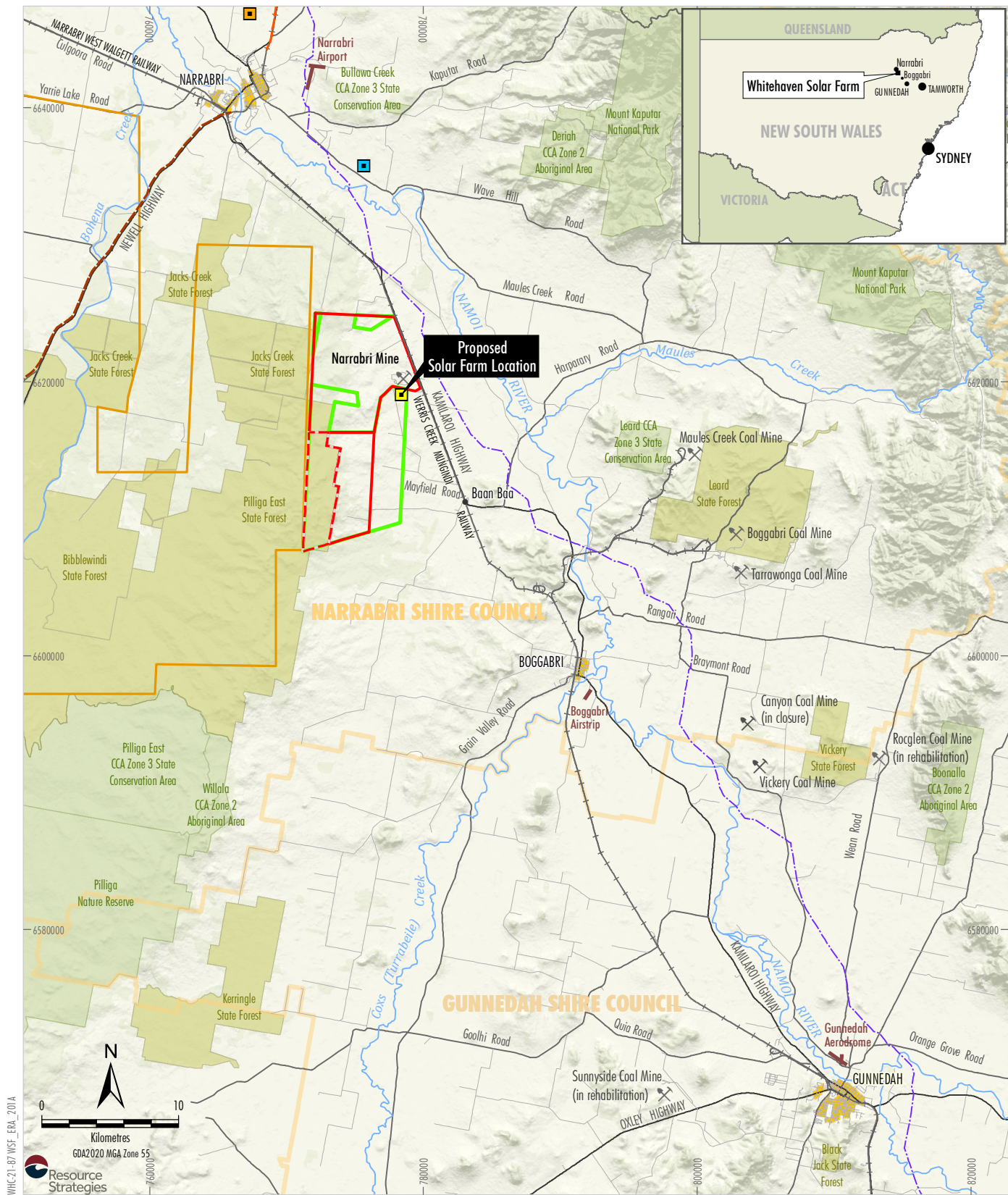
a risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment.

The risk assessment included the following tasks:

- establishing the context for the risk assessment, including conducting a review of supporting information and objectives;
- identifying any key issues to be assessed by an Environmental Impact Statement (EIS);
- analysing identified risks and nominating key environmental issues; and
- identifying potential controls and considering whether these controls would be adequate to mitigate identified risks.

1.2 METHODOLOGY

The methodology used for this ERA was to conduct a risk assessment generally consistent with the guidance provided in Australian Standard/New Zealand Standard (AS/NZS) International Organisation for Standardisation (ISO) 31000:2018 *Risk Management – Guidelines* (AS/NZS ISO 31000:2018) (Standards Australia Limited, 2018).



LEGEND

- | | | | |
|--|---|--|--|
| | Proposed Solar Farm Location | | Other Major Projects |
| | Mine Site | | Narrabri South Solar Farm |
| | Exploration Licence (EL 6243) | | Silverleaf Solar Farm |
| | Mining Lease (ML 1609, ML 1839) | | Narrabri Gas Project (Santos NSW [Eastem] Pty Ltd) |
| | Provisional Mining Lease Application Area | | Inland Rail (Narrabri to North Star - Phase 1) |
| | Local Government Boundary | | Proposed Inland Rail (Narramine to Narrabri) |
| | State Forest | | Proposed Queensland Hunter Gas Pipeline Alignment |
| | State Conservation Area, Aboriginal Area | | |



WHITEHAVEN SOLAR FARM
Regional Location

Figure 1

Whilst not wholly relevant to the Project, this ERA considers the findings of the *Narrabri Underground Mine Stage 3 Extension Project – Environmental Risk Assessment* (Operational Risk Mentoring, 2019), prepared for the Narrabri Underground Mine Stage 3 Extension Project.

Additionally, it is noted that this ERA has been prepared in accordance with the requirements of the SEARs issued for the Project, and the relevant requirements outlined in the *Large-Scale Solar Energy Guideline* (Department of Planning and Environment, 2022).

1.3 TEAM REVIEW

Consistent with AS/NZS ISO 31000:2018 (Standards Australia Limited, 2018), a team review of the ERA outcomes was undertaken. ERA content was developed by the Project team, which includes Whitehaven approvals personnel and project study team members.

2 CONTEXT

2.1 PROJECT CONTEXT

The Project would be located adjacent to the existing Narrabri Mine on Whitehaven Coal-managed land and would include approximately 26 MW DC or 20 MW AC of solar electricity generation and the construction of a 10 Megawatt Hour DC BESS. The Project would provide behind-the-meter electricity supply to the Narrabri Mine via the existing 66 kV ETL.

Whitehaven Energy, a wholly owned subsidiary of Whitehaven Coal, is the proponent of the Project and is seeking approval for the Project as a State Significant Development under section 4.36 of the NSW *Environmental Planning and Assessment Act 1979*.

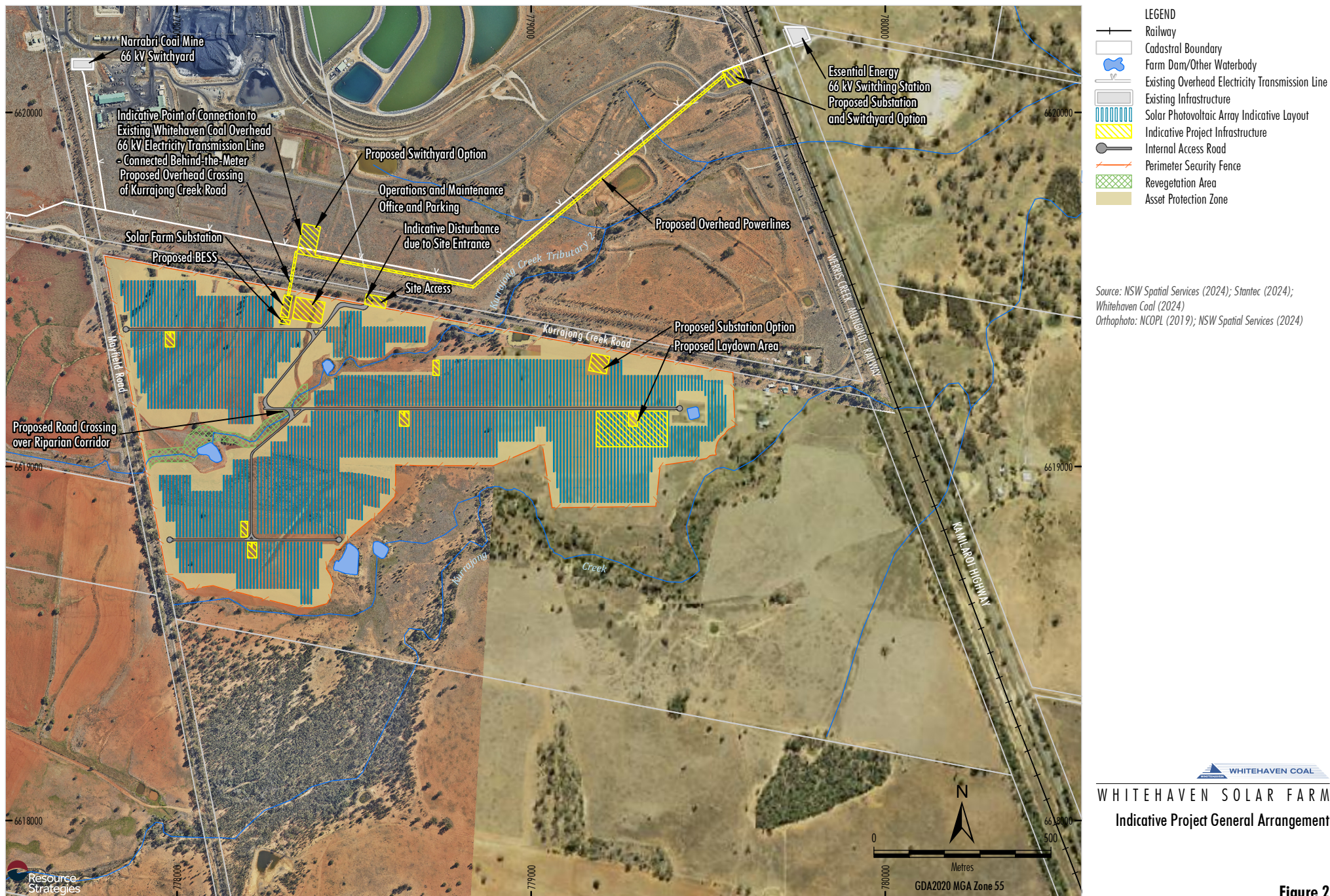
The Project would include the following primary components and activities (Figure 2):

- construction and operation of approximately 50,000 solar photovoltaic (PV) panels to provide electricity supply for the Narrabri Mine;
- construction of a substation that facilitates connection to the existing 66 kV overhead ETL;
- construction of an overhead ETL to connect the proposed substation to the existing 66 kV overhead ETL, north of Kurrajong Creek Rd;
- construction and operation of ancillary infrastructure including access roads, inverter stations, temporary staging areas, perimeter fencing and operations and maintenance buildings;
- construction and operation of a BESS;
- ongoing maintenance activities; and
- decommissioning and rehabilitation of the Project area.

Table 1 provides a summary of the key attributes of the Project.

Table 1
Summary of the Project

Project Component	Summary Description
Size and Purpose	26 MW DC, 20 MW AC for behind-the-meter electricity supply to the Narrabri Mine.
Project Area	Development site footprint of approximately 100 hectares.
Solar Configuration	■ Approximately 50,000 PV panels in a north to south alignment. ■ East to west tracking system (single axis).
Access Route	The proposed access route is via the Kamilaroi Highway and Kurrajong Creek Road.
Power Infrastructure	■ Substation and switchyard. ■ 66 kV connector to the existing 66 kV ETL.
BESS	■ 10 Megawatt Hour DC. ■ Centralised system. ■ Lithium battery.
Site Entry	Site entry would be via a constructed access point on Kurrajong Creek Road.
Construction	■ Construction period of approximately six to nine months. ■ Employment of approximately 30 personnel on average during its construction, with peak construction requiring approximately 65 personnel. ■ Construction undertaken during daylight hours.
Operational Life	The design operational life is approximately 50 years.
Decommissioning and Rehabilitation	Decommissioning at the end of the of Project life, involving the removal of all infrastructure with a proposed final land use to comprise a combination of native vegetation and agricultural land (pasture).
Capital Investment	Approximately \$55 million (M).
Hours of Operation	24 hours per day with scheduled maintenance activities generally undertaken during daytime hours.



WHITEHAVEN COAL
WHITEHAVEN SOLAR FARM
 Indicative Project General Arrangement

Figure 2

2.2 RISK MANAGEMENT CONTEXT

This ERA has been prepared in accordance with the SEARs issued for the Project (Section 1.1).

This ERA has been prepared to cover environmental issues only, and issues associated with safety, business or operation are not discussed further.

Additionally, this ERA has been prepared in consideration of the following documents:

- AS/NZS ISO 31000:2018 (Standards Australia Limited, 2018);
- HB 203:2012 *Managing environment-related risk* (HB 203:2012) (Standards Australia Limited, 2012); and
- MDG1010 *Minerals Industry Safety and Health Risk Management Guideline* (Department of Trade and Investment, 2011).

The key potential environmental issues identified in the *Whitehaven Solar Farm Project – Scoping Report* (Whitehaven Coal, 2023) have also been incorporated into this ERA.

2.3 RISK CRITERIA

The ‘tolerability’ of a risk refers to the willingness to live with a risk to secure benefits, on the understanding that it is being properly controlled (HB 203:2012 [Standards Australia Limited, 2012]). Legislation and general good practice measures are targeted to reduce risk levels to ‘As Low As Reasonably Possible’ (ALARP), or lower.

Consistent with the objectives of contemporary risk assessments, the criteria implemented in this ERA aims to treat risks to achieve an ALARP ranking, or lower. For the purposes of this ERA, an ALARP ranking was taken to be a moderate risk outcome.

3 RISK ASSESSMENT

3.1 RISK IDENTIFICATION

The process used for risk identification was to review the key Project components, stages and the environmental setting and identify key environmental risks. The identified risks were reviewed and confirmed by the team members (Section 1.3).

3.2 RISK ANALYSIS

Consistent with the objective of the ERA (i.e. *a risk assessment of the potential environmental impacts of the project, identifying the key issues*) (Section 1.1), a selection of the risks identified through the process described in Section 3.1 were identified by the team members to be the key issues for the Project ERA. Key issues were generally related to the following environmental aspects:

- Glint and Glare.
- Visual Amenity.
- Air Quality.
- Traffic.
- Water Resources.
- Noise.
- Aboriginal Cultural Heritage.
- Biodiversity.
- Agriculture.
- Land and Soils.
- Bushfire.
- Social/Economic.
- Electromagnetic fields (EMF).
- Greenhouse Gas.
- Waste.
- Decommissioning/Rehabilitation.

The key issues are presented in Table 2 below.

Table 2
Key ERA Issues

Ref	Issue	Aspect
1	Glare from solar panels could impact drivers on the Kamilaroi Highway. Glare from solar panels could impact on aviation and local residents.	Glint and Glare Assessment
2	Potential visibility of the Project PV panels and other infrastructure impacting private landholder visual amenity and/or views from nearby motorists.	Visual
3	Air quality issues during construction and decommissioning stages, impacting community health.	Air Quality
4	Traffic (including heavy vehicles and OSOM vehicles if required) generated by the Project may increase congestion on Kamilaroi Highway and impact on the Kamilaroi Highway/Kurrajong Creek Road intersection, with increased travel time for other road users due to increased demands and slower-moving heavy vehicles.	Traffic
5	Impacts on downstream water quality from increased sediment migration during construction and decommissioning activities.	Water Resources
6	Debris trapped against infrastructure associated with the Project (e.g. fencing) exacerbates the impacts of a flooding event at Kurrajong Creek, leading to off-site impacts.	Water Resources
7	Construction noise generated by the Project impacts nearby landholders.	Noise
8	Cumulative noise impacts from all sources of noise may have an adverse impact on community health.	Noise
9	Unacceptable impact/s to registered or unregistered but known Aboriginal or historic heritage sites.	Aboriginal Cultural Heritage
10	Clearing associated with the Project creates unacceptable ecological impacts.	Biodiversity
11	Loss of agricultural land and associated loss of agricultural productivity.	Agricultural
12	Construction of the Project results in a degradation of LSC Class resulting in an inadequate final landform.	Land and Soils
13	Equipment malfunction leads to fire onsite which spreads and eventuates in a bushfire with off-site impacts.	Bushfire
14	Cumulative incremental impacts with nearby mining operations (including the neighbouring Narrabri Mine) on community infrastructure (e.g. roads, accommodation, services).	Social/Economic
15	Working adjacent to BESS units, high voltage power lines, transformers, inverters and substation.	EMF
16	Project contributions to greenhouse gas emissions through the use of diesel during construction and decommissioning.	Greenhouse Gases
17	Generation of general waste associated with packing of PV equipment and decommissioning.	Waste
18	Rehabilitation criteria is not met following closure and decommissioning of the Project.	Decommissioning and Rehabilitation

Note: OSOM = over-size over-mass, LSC = Land and Soil Capability.

3.3 RISK EVALUATION

Risk ranking was undertaken by the team using qualitative measures of likelihood and consequence developed by Whitehaven Energy and provided in Tables 3 and 4, respectively. These were combined to form a quantitative measure of risk outlined in Table 5.

The risk evaluation was undertaken with consideration of the effective implementation of planned controls (Section 4).

Table 3
Qualitative Measures of Likelihood

Rank (L)	Likelihood	Description
5	Almost certain	The unwanted event has occurred frequently, occurs in order of one or more times per year and is likely to reoccur within one year.
4	Likely	The unwanted event has occurred infrequently, occurs in order of less than once per year and is likely to reoccur within five years.
3	Possible	The unwanted event has happened at some time; or could happen within 10 years.
2	Unlikely	The unwanted event has happened at some time; or could happen within 20 years.
1	Rare	The unwanted event has never been known to occur; or is highly unlikely to occur within 20 years.

Table 4
Qualitative Measures of Consequence

			Consequence Rating				
			1. Negligible	2. Minor	3. Medium	4. Major	5. Catastrophic
Consequence Categories	Health & Safety		First Aid from injury or occupational illness.	Medical Treatment from injury or occupational illness.	Lost time from disabling injury or occupational illness / multiple medical treatments / restricted work.	Fatality (≤ 5) / permanent incapacity due to injury or occupational illness.	Multiple fatalities (≥ 6), multiple cases of permanent incapacity due to injury or occupational illness.
	Environment		No lasting environmental impact (typically <24hr).	Short term environmental impact (typically <week), requires minor remediation.	Medium term environmental impact (typically <year), requires moderate remediation.	Long term environmental impact (2 to 10 years), requires significant remediation.	Unconfined and widespread environmental damage or effect (permanent; >10 years), requires major remediation.
	Legal & Compliance		Minor administrative breach of regulation without action.	Breach of law / regulation or non-compliance, minor legal issues, minor litigation possible.	Serious breach of law / regulation, regulatory investigation, enforcement action.	Major breach of law / regulation and prosecution at operational level, suspension of licence.	Major litigation / prosecution at business level, loss of licence.
	Reputation & Community		Negligible media interest. Public concern restricted to local complaints. Low level repairable impact to commonplace structures.	Local media coverage. Verified complaint received from an internal or external stakeholder. Impact to low significance cultural heritage.	Media coverage at regional level. Local Stakeholder action resulting in regional public concern. Permanent impact to items of cultural significance.	Media coverage at national level. Campaign from government and / or high-profile NGOs threatening continuity of operations. Significant impact to items of cultural significance.	Media coverage at international level. Sustained campaign from government and / or high-profile NGOs threatening business continuity. Major irreparable impact to highly valuable items of cultural significance.
	Projects (Schedule, Project CAPEX)		Minimal delay to one or more of the project's critical path activities and/or impact project CAPEX.	Minor delay to one or more of the project's critical path activities and/or impact project CAPEX.	Delay to one or more of the project's critical path activities and/or impact project CAPEX.	Significant delay to one or more of the project's critical path activities and/or impact project CAPEX.	Extreme delay to one or more of the project's critical path activities and/or impact project CAPEX.
	Business Interruption & Equipment Damage		No measurable operational impact to the business.	Minor damage, capital impact, business disruption, and/ or degradation of production.	Moderate damage, capital impact, business disruption and/ or degradation of production.	Major damage, capital impact, business interruption and/ or degradation of production.	Extensive damage, capital impact and/ or business interruption, serious threat to long term viability of the business.
	Financial	Revenue	<\$5m	\$5m - \$15m	\$15m - \$75m	\$75M - \$400m	>\$400m
		EBITDA	<\$1m	\$1m - \$15m	\$15m - \$30m	\$30M - \$200m	\$>200m
		NPV	<\$5m	\$5m - \$25m	\$25m - \$150m	\$150M - \$1b	>\$1b

Source: Whitehaven Group (2023).

Notes: CAPEX = Capital expenditure, EBITDA = Earnings before interest, taxes, depreciation and amortization, NPV = Net present Value.

Table 5
Risk Matrix

		Consequence Rating				
		1. Negligible	2. Minor	3. Medium	4. Major	5. Catastrophic
Likelihood	5. Almost certain	M5	H10	H15	C20	C25
	4. Likely	L4	M8	H12	H16	C20
	3. Possible	L3	M6	M9	H12	H15
	2. Unlikely	L2	L4	M6	M8	H10
	1. Rare	L1	L2	L3	L4	M5

Source: Whitehaven Group (2023).

Notes:

L = Low; M = Moderate; H = High; C = Critical.

Risk Numbering:

1 = lowest risk; 25 = highest risk.

Legend:

	Low
	Moderate
	High
	Critical

4 RISK TREATMENT

The Risk Treatment Plan was developed by the team members. Table 6 displays the Risk Treatment Plan and is ordered by aspect type and priority.

Table 6
Risk Treatment Plan

Ref	Aspect	Issue	Planned Controls	L	C	R
1	Glint and Glare	Glare from solar panels could impact drivers on the Kamilaroi Highway. Glare from solar panels could impact on aviation and local residents.	Use low glare panels. Distance to Narrabri Airport (25 km) mitigates aviation impacts.	2	1	L2
2	Visual	Potential visibility of the Project PV panels and other infrastructure impacting private landholder visual amenity and/or views from nearby motorists.	Location of infrastructure away from Kamilaroi Highway. Retention of vegetation where possible to reduce visibility.	1	1	L1
3	Air Quality	Air quality issues during construction and decommissioning stages, impacting community health.	Controls during construction (e.g., use of water carts, minimisation of disturbed areas, restricting vehicle speeds, modifying activities during adverse weather conditions).	2	1	L2
4	Traffic	Traffic (including heavy vehicles and OSOM vehicles if required) generated by the Project may increase congestion on Kamilaroi Highway and impacts on the Kamilaroi Highway/Kurrajong Creek Road intersection, with increased travel time for other road users due to increased demands and slower-moving heavy vehicles.	Buses to be used to transport construction personnel to site. OSOM traffic to be scheduled to avoid peak shift changes at nearby Narrabri Mine. Preparation of a Construction Environment Management Plan.	2	1	L2
5	Water Resources	Potential impact on downstream water quality due to increased sediment migration to local creeks during construction and decommissioning activities.	Incorporation of construction drainage management as part of detailed design (e.g., erosion and sediment control plan).	3	1	L3

Table 6 (Continued)
Risk Treatment Plan

Ref	Aspect	Issue	Planned Controls	L	C	R
6	Water Resources	A flooding event at Kurrajong Creek or minor tributaries impacts the site and infrastructure and/or exacerbates flooding downstream.	Project design to avoid placement of PV arrays in drainage lines. Project is located a significant distance from the Namoi River Floodplain. No observed history of floods on the site. Flood modelling for the Project indicates that the Project area is of low flood risk (WRM, 2024). Installation of appropriate fencing such that the flow of flood waters is not inhibited by blockages caused by build-up of material at fence boundaries. Regular inspections of fencing for structural integrity and effectiveness, and repair as required to maintain function. Development of Construction and Operational Environmental Management Plan incorporating Water Management controls.	2	2	L4
7	Noise	Noise from construction of the Project impacts nearby landholders.	Construction to occur during standard construction hours only. Preparation of a Construction Environment Management Plan.	2	1	L2
8	Noise	Cumulative noise impacts from all sources of noise may have an adverse impact on community health.	Assessment of predicted noise impacts to identify performance against relevant noise criteria (RWDI Australia Pty Ltd, 2024). Preparation of a Construction Environment Management Plan.	1	2	L2
9	Aboriginal Cultural Heritage	Impact/s to known Aboriginal heritage sites.	Site survey and Aboriginal Cultural Heritage Assessment. Avoidance of impacts to some sites by the Project design. Pre-clearance Aboriginal heritage surveys.	2	2	L4
10	Biodiversity	Clearing associated with the Project creates unacceptable ecological impacts.	Site survey and Biodiversity Development Assessment Report. Avoidance of impacts by relocating infrastructure where possible. Biodiversity offsets.	2	2	L4

Table 6 (Continued)
Risk Treatment Plan

Ref	Aspect	Issue	Planned Controls	L	C	R
11	Agricultural	Loss of agricultural land and associated loss of agricultural productivity.	Minimisation of impacts via Project design. Incorporation of elements into the Project design to ensure agricultural land uses can occur concurrently with the Project (i.e. agrisolar).	1	3	L3
12	Land and Soils	Construction of the Project results in a degradation of LSC Class resulting in an inadequate final landform.	Preparation of a Construction Environment Management Plan. Implementation of appropriate erosion and sediment control measures in the Project's design.	1	3	L3
13	Bushfire	Equipment malfunction leads to fire onsite which spreads and eventuates in a bushfire with off-site impacts.	Establishment and maintenance of Asset Protection Zones. Liaison with the Rural Fire Service to facilitate rapid response. Vegetation management within electrical transmission easements. Regular inspections and maintenance of firefighting equipment. Availability of water supply and other firefighting equipment from the Narrabri Mine. Project is not sited on bushfire prone land. Operational procedures and operator training. Preparation of a Bushfire Emergency Management & Operations Plan.	1	3	L3
14	Social/Economic	Cumulative incremental impacts with nearby mining operations (including the neighbouring Narrabri Mine) and other renewable energy developments on community infrastructure (e.g. roads, accommodation, services).	Manage construction workforce accommodation. Utilisation of existing workforce accommodation facilities. Development of a Construction Environmental Management Plan, which would include a traffic management sub-plan.	2	1	L2

Table 6 (Continued)
Risk Treatment Plan

Ref	Aspect	Issue	Planned Controls	L	C	R
15	EMF	EMF emissions from BESS units, high voltage power lines, transformers, inverters and substation.	Design and selection of onsite substation is undertaken in consideration of the EMF exposure levels described by International Commission on Non-ionising Radiation Protection. Detailed design of the proposed site layout would result in EMF exposure at the substation boundary being generally similar to background levels. Monitoring of EMF levels during the commissioning of substation to confirm exposure levels. Restricted access to unauthorised persons. Installation of fences to prevent unauthorised personnel from trespassing and livestock meandering.	1	1	L1
16	Greenhouse Gases	Project contributions to greenhouse gas emissions through the use of diesel during construction and decommissioning.	Preparation of Construction Environment Management Plan, which would include greenhouse gas mitigation and abatement measures. The Project is designed to supply electricity to the Narrabri Mine, thereby reducing the amount of electricity imported from the grid.	1	1	L1
17	Waste	Generation of general waste associated with packaging of PV equipment and decommissioning.	Waste management measures to be included in procurement for solar construction. Consultation with Narrabri Shire Council.	1	2	L2
18	Decommissioning and Rehabilitation	Rehabilitation criteria is not met following closure and decommissioning of the Project.	The area associated with the Project would be rehabilitated and restored to pre-existing uses, including the pre-existing LSC Class. All infrastructure would be removed unless there is significant justification for retaining it.	1	2	L2

5 MONITORING AND REVIEW

5.1 NOMINATED COORDINATOR

The nominated coordinator is the Project Manager.

5.2 IMPLEMENTATION REVIEW PLAN

It is important to confirm the controls and actions identified are appropriately managed. The expectation of the team was that the Project Manager would coordinate and monitor all controls identified within the ERA.

5.3 COMMUNICATION AND CONSULTATION

Communication and consultation form an integral part of the risk management process. It is the Project Manager's responsibility to confirm that this report is shared with all relevant personnel and other stakeholders as appropriate.

5.4 CONCLUSIONS

A review team identified the key environmental issues associated with the Project. These issues will be covered in detail in the specialist assessment reports to be appended to the Project EIS, including:

- Appendix A Biodiversity Development Assessment Report.
- Appendix B Aboriginal Cultural Heritage Assessment.
- Appendix C Agricultural Impact Assessment.
- Appendix D Landscape and Visual Assessment.
- Appendix E Road Transport Assessment.
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The review team risk ranked the identified key environmental issues and concluded that risks are ALARP or lower.

6 REFERENCES

Department of Planning and Environment (2022) *Large-Scale Solar Energy Guideline*.

Department of Trade and Investment (2011) *MDG1010 Minerals Industry Safety and Health Risk Management Guideline*.

Operational Risk Mentoring (2019) *Narrabri Underground Mine Stage 3 Extension Project – Environmental Risk Assessment*.

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